



**Entergy
Operations**

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September 26, 1996

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
Reply To A Notice Of Violation
Failure to Follow Procedure for Performance of a Local Leak Rate Test on
Containment Penetration Number 65

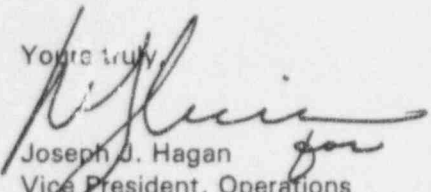
Reference: NRC Inspection Report No. 50-416/96-13 (Item M1.3), dated August 28, 1996

GNRO-96/00110

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/96-13-01.

Yours truly,


Joseph J. Hagan
Vice President, Operations
Grand Gulf Nuclear Station
JJH/CEB

attachment

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Notice of Violation 96-13-01

During an NRC inspection conducted from July 7 through August 17, 1996 at the Grand Gulf Nuclear Station, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" NUREG-1600, the violation is listed below:

Technical Specification 5.4.1.a states, in part, that written procedures shall be implemented covering the applicable activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

Paragraph 8 of Appendix A to Regulatory Guide 1.33 recommends procedures for penetration leak rate tests.

Procedure 06-ME-1M61-V-0001, "Local Leak Rate Test," Revision 103 states that Valve TV-14 be opened and later checked open to pressurize the penetration being tested. This step is to be accomplished before obtaining test data.

Contrary to the above:

1. On July 24, 1996, procedure 06-ME-1M61-V-0001 was not properly implemented during a test of containment penetration Number 65, in that personnel did not open Valve TV-14 prior to obtaining test data. Failure to properly implement the procedure resulted in improper performance of the local leak rate test (LLRT) for the penetration being tested.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

1. The root cause of the failure to properly implement Procedure 06-ME-1M61-V-0001, which manifested itself in the improper performance of the LLRT on Containment Penetration Number 65, was determined to be an inadequate procedure. The specific inadequate elements of the procedure and their adverse impact during performance of the LLRT on Containment Penetration Number 65 were determined by the root cause analysis to be; 1) multiple actions per procedural step, and 2) excessive details within the procedure that are not applicable to the performance of the test being performed.

A contributing cause of this event was less than adequate communication by the maintenance technicians. Interviews with the maintenance technicians performing the test indicate that three way communication was not utilized at all times during the performance of the test evolution. However, the expectations of three way communications with one individual reading the procedure and another individual executing the procedure steps were not clearly understood by the personnel performing the test.

Additional contributing causes of this incident were the absence of a place keeping mechanism within the procedure to verify completion of each step when performed and lack of concise labeling of the test panel valves to be manipulated. The work package utilized by maintenance technicians only contain the applicable data collection sheets. The standard practice is to obtain a controlled copy of the required procedure instructions from records storage. Upon completion of the respective task, the controlled copy of the procedure is returned to records storage. Since any field notes or markings made on the procedure during performance of the task would degrade the procedure's usefulness, no place keeping methodology was utilized. Additionally, lack of procedure place keeping was further exasperated by inadequate valve labeling which required the maintenance technicians to flip back and forth between the procedure's instructions and a reference drawing within the procedure to facilitate identification of valves to be manipulated.

GGNS agrees with the findings of the inspection report, in that Procedure 06-ME-1M61-V-0001 was improperly implemented during performance of the LLRT on Containment Penetration Number 65. However, the inspection report also notes that the inspector believed that the test would not have been successfully completed without the inspector's prompting. We disagree with this conclusion. As noted in the inspection report, the test was in progress when the inspector pointed out to test personnel that the test valve was closed. We believe that test personnel, as part of the test restoration process, would have identified that the test valve was closed and re-performed the test.

III. Corrective Steps Which Have Been Taken and Results Achieved

1. Immediate corrective actions were:

- The mechanical maintenance technicians received a written reprimand for failure to observe established practices for self verification of work activities.
- The LLRT test rig was upgraded by installation of proper permanent labeling.
- QDR 96-0183 was generated to document the event and to initiate corrective actions, and
- Mechanical Maintenance Procedure 06-ME-1M61-V-0001 was revised to clarify the specific steps that were improperly implemented.

2. Interim corrective actions planned are:

- Provide QDR 96-0183 to mechanical maintenance personnel via the Required Reading Program to heighten awareness to this event.
- Provide contracted mechanical maintenance personnel which will be performing LLRTs with training to ensure their competency and proficiency in performing LLRTs in accordance with the GGNS maintenance program requirements.
- Review all additional LLRT test panels to identify and install appropriate labeling to ensure valves are clearly identified.

IV. Corrective Steps to be Taken to Preclude Further Violations**1. Long term corrective actions are:**

- The surveillance test procedure, 06-ME-1M61-V-0001 "Local Leak Rate Test", will be further enhanced to separate multiple actions within a single step to facilitate human factors.
- A method and expectation for procedure place keeping will be developed and communicated to mechanical maintenance personnel.
- Expectations for the use of three way communication will be developed and re-enforced to all mechanical maintenance personnel.
- Review all additional LLRT test panels to identify and install appropriate labeling to ensure valves are clearly identified.

V. Date When Full Compliance Will be Achieved

As outlined above, the corrective actions to rectify the findings of this inspection report are being implemented through a phased-in approach, thus allowing sufficient time for a comprehensive response to the root causes of this event. The immediate corrective actions are complete. The above interim corrective actions will be completed by October 18, 1996, prior to commencement of the 8th refueling outage. All of the above corrective actions, including the long-term corrective actions, shall be completed by June 30, 1997.