



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

P. O. BOX 1640, JACKSON, MISSISSIPPI 39215-1640

September 6, 1985

CORRECTED COPY to correct  
the old ID number AECM-85/  
0273 to new number AECM-85/  
0283.

NUCLEAR LICENSING & SAFETY DEPARTMENT

Dr. J. Nelson Grace, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N. W., Suite 2900  
Atlanta, Georgia 30323

Dear Dr. Grace:

SUBJECT: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
File: 15521/15524  
Report No. 50-416/85-22, dated  
August 9, 1985 (MAEC-85/0266)  
AECM-85/ 0283

Mississippi Power & Light Company hereby submits responses to violations  
50-416/85-22-01, -03, and -05.

Yours truly,

L. F. Dale  
Director

RLS/SHH:vog  
Attachment

cc: Mr. J. B. Richard (w/a)  
Mr. O. D. Kingsley, Jr. (w/a)  
Mr. R. B. McGehee (w/a)  
Mr. N. S. Reynolds (w/a)  
Mr. H. L. Thomas (w/o)  
Mr. R. C. Butcher (w/a)

Mr. James M. Taylor, Director (w/a)  
Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

8509260120 850906  
PDR ADOCK 05000416  
G PDR

bcc: Mr. William Cavanaugh (w/a)  
Mr. L. E. Ruhland (w/a)  
Mr. J. E. Cross (w/a)  
Mr. T. H. Cloninger (w/a)  
Mr. F. W. Titus (w/a)  
Mr. T. E. Reaves (w/a)  
Mr. S. M. Feith (w/a)  
Mr. C. L. Tyrone (w/a)  
Mr. L. L. Kintner (w/a)  
Mr. L. F. Daughtery (w/a)  
Mr. C. W. Angle (w/a)  
SRC Secretary (w/a)  
MSS Nuclear Activities (w/a)  
~~File (LCTS) (w/2)~~  
File (Central) (w/a) [ 11 ]

NRC VIOLATION 50-416/85-22-01

Notice of Violation

Technical Specification (TS) 3.6.6.1, action statement a, states that in operational condition 1, 2 or 3, restore secondary containment integrity within 4 hours or be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours. Operations Section Procedure 02-S-01-17, Control of Limiting Conditions for Operations, Paragraph 6.1. requires the shift supervisor fill out a Limiting Condition for Operation (LCO) report anytime the plant enters the action statement of a TS.

Contrary to the above, on June 17, 1985, when secondary containment door 1A318 was blocked in the open position, therefore entering action statement a to TS 3.6.6.1, the shift supervisor did not fill out an LCO report.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. The violation did not affect the health and safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

Secondary containment door 1A318 inside opening mechanism was failing, which resulted in the door being difficult to open. Instead of plant personnel notifying the shift superintendent of this condition, the door was blocked in the open position. This was contrary to the posting on the door which required that the shift superintendent be notified prior to the door being blocked open. Since the shift superintendent was not notified, TS 3.6.6.1, action statement a, was not entered.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Maintenance Work Order (MWO) E53832 was issued to replace some damaged latch bolt retaining screws.

A memorandum from the Grand Gulf General Manager was issued to plant superintendents. In this memorandum, it was stated that any door found not properly operating or blocked open, should be reported to the control room. The importance of ensuring that both contract and utility personnel understand the seriousness of this matter was also stressed.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

MP&L considers the actions discussed in III above sufficient to prevent further violations.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

NRC VIOLATION 50-416/85-22-03

Notice of Violation

10 CFR 50, Appendix B, Criterion XVI, implemented by the licensee's NRC approved Operational Quality Assurance Program as described in their Operational Quality Assurance Manual (OQAM), requires that measures shall be established to provide for the correction of conditions adverse to quality or safety of the Grand Gulf Nuclear Station. Paragraph 16.5.3 of the OQAM states that the procedures shall require that action be promptly initiated and adequately documented by the responsible organization to correct the condition and to determine if action is necessary to preclude its recurrence.

Contrary to the above, on April 9, 1984, Nuclear Plant Engineering was made aware of the potential for the scram discharge volume vent and drain valves to be made inoperable by the positioning of their manual handwheels in the full open position and failed to notify the plant until May 20, 1985.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. The violation did not affect the health and safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

The engineer assigned to investigate the document which resulted in discovery that the GGNS Scram Discharge Volume (SDV) vent and drain valves had handwheels which could render them inoperable if manually mispositioned (INPO Significant Event Report 4-84) was not cognizant of the potential impact on plant Technical Specifications and SDV operability. Therefore the condition was not brought to the attention of NPE management and Plant Staff was not notified immediately.

A priority system was in effect, but Significant Event Report (SER) 4-84 had been initially assigned a routine priority since its applicability to GGNS was not readily apparent.

Nuclear Plant Engineering Administrative Procedure 01-701, "Onsite and Offsite Document Evaluations," did not provide engineers evaluating industry documents adequate detailed guidance regarding the reassignment of priorities during the evaluation process and notification of Plant Staff if a concern was discovered which affected the plant Technical Specifications or nuclear safety.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Investigative actions were performed to determine the extent of similar conditions. Open industry and NRC documents currently under evaluation by the Operational Analysis Section of Nuclear Plant Engineering were reviewed to determine if additional safety significant issues existed and Plant Staff had not been notified. Based on this review, additional documents were not identified.

Operational Analysis Section personnel performing document evaluations were reinstructed to promptly notify supervision when a problem affecting plant Technical Specifications or nuclear safety is identified.

Nuclear Plant Engineering Administrative Procedure 01-701, "Onsite and Offsite Document Review," has been revised. The revised procedure provides, to Operational Analysis Section personnel that evaluate the documents, additional directions regarding priority and notifications required when a problem is identified that affects plant Technical Specifications or nuclear safety.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

MP&L considers the actions discussed in III above sufficient to prevent further violations.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

NRC VIOLATION 50-416/85-22-05

Notice of Violation

Technical Specification (TS) 6.8.1 requires written procedures be established, implemented, and maintained. Maintenance Procedure 01-S-07-02 requires retest instructions be provided on a retest control form attached to a maintenance work order.

Contrary to the above, Maintenance Procedure 01-S-07-02 requirements for specifying retest instructions were not followed in that retest instructions were not provided to the technicians on the retest control form. This resulted in inadequate retest instructions causing a reactor scram.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. The violation did not affect the health and safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

Maintenance Electricians were performing an inspection and test on breaker 252-1201 to determine if a suspected nonconformance condition actually existed. While testing the breaker, both of the bus breakers tripped open de-energizing the bus.

The loss of power caused a trip of reactor recirculation pump B, circulating water pump B, and the B lube water pump for the circulating water pumps. Circulating water pump A subsequently tripped due to low lube water flow. As a result, reactor power decreased and condenser vacuum began to drop. The turbine then tripped due to low condenser vacuum. The reactor scrammed and reactor recirculation pump A transferred to slow speed in response to the turbine control valve fast closure signal.

Due to the inadequate retest instruction, the electricians were unaware that even with the breaker racked to the test position, operation of a single component could result in opening both supply breakers. Another test switch in the circuit should have been placed in the test position to prevent opening the in-service breaker. This information was not provided with the work instructions by either the maintenance planner or engineer.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A memorandum from the Electrical Maintenance Superintendent was issued to the Electrical Engineers, Planners, and Supervisor. These individuals were informed that the following guidelines would be adhered to:

- ° Maintenance Work Orders will not be issued without detailed retest instructions.
- ° When a relay is included in a retest, each contact and its effect on plant equipment will be verified.
- ° Supervisors will review retest instructions to assure adequate and accurate guidance is provided.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

MP&L considers the actions discussed in III above sufficient to prevent further violations.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.



CONCURRENCE REVIEW FORM

SECTION I

AECM- 85/0283 Rev. 0

RESPONSE DUE:

Target 9/15/85  
9/8/85

SUBJECT: Response to Violations 85-22-01, -03, -05.

R L Scott 9/4/85

NRC Document Preparer/Date

S H Hobbs

9-4-85

Responsible Section Manager/Date

All Signatures Required

SECTION II

Concurrence  
Review Required

ROUTING  
ORDER\*

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Concur  
with  
Comments  
Comments

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SVP Nuclear/Date

☐ ☐

☒ ☐

ODR  
VP Nuclear  
Operations/Date

9/6/85

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J F Dool  
Director, Nuclear  
Licensing & Safety/Date

9/6/85

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GGNS General Manager/Date

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Facsimile Attached  
Director, Nuclear  
Engineering &  
Construction/Date

9/6/85

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\* Only provided for Routine Reviews

All Specified Signatures Required



NRC SUBMITTAL PREPARATION/REVIEW  
ATTACHMENT IV TO PROCEDURE 1.13

REV. 1

DATE  
APR 5 1985

PAGE 1 of 1



**SECTION I**

**CONCURRENCE REVIEW FORM**

*Target 9/5/85*

ARCH- 85/0203 Rev: 0

RESPONSE DUE: 9/8/85

SUBJECT: Response to Violations 85-22-01, -03, -05

R. L. Scott 9/4/85

WAC Document Preparer/Date

L.H. Hoff

9-4-85

Responsible Section Manager/Date

All Signatures Required

**SECTION II**

Concurrence  
Review Required

ROUTING ORDER*	I	II	Concur	Concur with Comments	Comments
	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					SVT Nuclear/Date
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					VP Nuclear Operations/Date
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					Director, Nuclear Licensing & Safety/Date
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					DCNS General Manager/Date
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>A, noted</i>
					Director, Nuclear Engineering & Construction/Date
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\* Only provided for Routine Reviews

All Specified Signatures Required



WAC SUBMITTAL PREPARATION/REVIEW  
ATTACHMENT 17 TO PROCEDURE 1.13

REV. 1

DATE

APR 2 1985

PAGE 1 of 1

COMMENTS — AECM-86/0273

1) Page 2 of 5 Section II 1<sup>st</sup> Paragraph

A) on 4<sup>th</sup> line change "AWARE" to "Cognizant"

B) on 7<sup>th</sup> line typo "handwheels"

C) on 9<sup>th</sup> line typo "immediately"

2) Page 3 of 5 section III 1<sup>st</sup> Paragraph

change to read as follows:

Investigative actions were performed to determine the extent of similar conditions. Open Industry and NRC documents currently under evaluation by the Operational Analysis Section of Nuclear Plant Engineering were reviewed to determine if additional safety significant issues existed and Plant Staff had not been notified. Based on this review, additional documents were not identified.

DOCUMENT REVIEW REQUEST FORM

PART I (NUCLEAR LICENSING AND SAFETY)

TO: QA

DATE: 9/4/85

Your review as indicated below of the following document is requested:

Document Title: AECH-85/0283

- ☒ Concurrence  
☐ Quality Requirement Review  
☐ Technical Content Review  
☐ Licensing Impact Review

Please complete PART II of this form and return as indicated below not later than 4 PM . 9/4/85

Please return this form to:

Director, Nuclear Licensing and Safety (ATTN: Manager of Ray Scott).

PART II (REVIEWING ORGANIZATION)

The document indicated above has been reviewed.

- ☐ No Comments  
☒ Comments Typos on letter and page 3 of  
attachment

Ray C. Shulda 9/4/85  
Reviewer's Signature/Date

KDS 9/4/85 Director  
W. E. Smith  
QA Date 9/5/85

PART III (NUCLEAR LICENSING AND SAFETY)

Comments indicated above have been incorporated or resolved as follows:

Corrected. KLS 9/5/85

Q. L. Hott 9/5/85  
Signature/Date



REVIEW OF DOCUMENTS

ATTACHMENT I to Procedure 1.11

REV. 0

DATE  
OCT 15 1984

PAGE 1 of 1