



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

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July 16, 1985

NUCLEAR LICENSING & SAFETY DEPARTMENT

U. S. Nuclear Regulatory Commission
Office of the Executive Director For Operations
Washington, D. C. 20555

Attention: Mr. William J. Dircks, Executive Director

Dear Mr. Dircks:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
File: 0260/L-835.0
10CFR50.73 Exemption Request
For ESF Actuations Occurring
From Single Channel Trip
Signals
AECM-85/0180

The reporting requirements for Licensee Event Reports include 10CFR50.73(a)(2)(iv) which requires reporting of actuations of any Engineered Safety Feature (ESF). The Grand Gulf Nuclear Station (GGNS) design includes the Containment and Reactor Vessel Isolation Control System (CRVICS) as an ESF even though some of the isolations actuated by CRVICS involve systems which are not ESF systems and which are actuated by single channel trip signals. Mississippi Power and Light Company (MP&L) believes that inadvertent actuations of this type are not significant and should not be reported as a licensee event and is therefore requesting an exemption from the reporting requirements for actuations of certain isolation valves which do not compromise plant safety or power generation as allowed by 10CFR50.73.

The CRVICS includes the sensors, channels, transmitters, and remotely activated valve closing mechanisms associated with the valves which isolate the containment or reactor vessel. CRVICS includes all those systems that are required for reactor vessel and containment isolation during the various modes of operation. The purpose of CRVICS is to prevent the release of significant amounts of radioactive materials from the fuel and reactor coolant pressure boundary by automatically isolating the appropriate lines that penetrate the containment. The power generation objective is to avoid spurious closure of certain isolation valves as a result of a single failure. The logic design for several CRVICS instrumentation and control subsystems (e.g., reactor water cleanup system - high differential flow, reactor water cleanup system - high temperature and differential temperature, reactor core isolation cooling - steam line flow high) initiate a division logic trip and closure of either the inboard or outboard isolation valve (but not both with a single instrument channel). This provides no protection against inadvertent isolation due to

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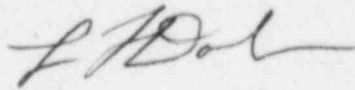
single instrument failure. A detailed description of CRVICS is provided in GGNS FSAR Section 7.3.1.1.2.

Inadvertent isolations of the Reactor Water Cleanup (RWCU) System due to high differential flow signals have been experienced at Grand Gulf Unit 1 during low power levels and during normal system manipulation where the system flow is operated near the differential flow setpoint. Isolations of this type have no effect on plant safety or power generation. Other examples of inadvertent isolations experienced at Grand Gulf Unit 1 which have no effect on power generation or plant safety are isolations of the RWCU system due to spurious high temperature signals. MP&L believes events of this type are insignificant.

MP&L believes that CRVICS actuations of non-ESF system isolations as described above are not significant and should not be reported as a licensee event. Granting of this exemption will not impact the health and safety of the public nor will it impact plant safety. The isolations initiated by CRVICS which are related to performing its containment isolation function to prevent the release of significant amounts of radioactive material are significant and will remain reportable. Isolations actuated for this purpose are significant and should remain reportable. This exemption will have no effect on that function or reporting of events involving that function.

If there are any questions, please advise.

Yours truly,



L. F. Dale
Director

EBS/SHH:dmm

cc: (See Next Page)

cc: Mr. J. B. Richard
Mr. O. D. Kingsley, Jr.
Mr. R. B. McGehee
Mr. N. S. Reynolds
Mr. G. B. Taylor
Mr. R. C. Butcher

Mr. James M. Taylor, Director
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