NRC Form 366 (9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Grand Gulf Nuclear Station - Unit 1	0 5 0 0 0 4 1 6	1 OF 0 3

TITLE (4)

Liquid Effluent Flow Rate Estimate Exceeded LCO Time Limit

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
1 2	1 8	8 4	8 5	0 3 2	0 0	0 9	2 6	8 5	N/A	0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9): 4

POWER LEVEL (10): 0 1 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Ronald Byrd/Licensing Engineer	AREA CODE 6 0 1 4 3 7 - 2 1 4 9

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)

		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On August 29, 1985, following a Quality Assurance audit, Plant Staff determined that a reportable condition had occurred on December 1, 1984, and on December 4, 1984, when liquid effluent release flow rate estimates exceeded the 4 hour frequency of Technical Specification 3.3.7.11 Action 111 requirements.

From November 30, 1984 to December 6, 1984, the circulating water system, the normal dilution source for radwaste liquid effluent, was out of service. Whenever the circulating water blowdown or discharge canal monitors are out of service, dilution flow is obtained from sources without flow rate measuring devices. Technical Specification 3.3.7.11 requires the flow rate to be estimated at least once per 4 hours during actual release when the required flow rate monitors are not operable. During the releases on December 1 and December 4, 1984, flow rates were estimated approximately 30 minutes later than allowed.

Procedural controls at the time were inadequate to ensure compliance with the action statement. The Radioactive Discharge Controls procedure was revised to require that compliance with this action be documented on the Discharge Permit Form.

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NRC Form 366A (9-83)

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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APPROVED OMB NO. 3150-0104
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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Description of Reportable Occurrence

Action 111 of Technical Specification 3.3.7.11 allows radioactive effluent releases to continue for up to 30 days with flow rate measurement devices inoperable, provided the flow rate is estimated at least once per 4 hours during actual releases. On December 1, 1984 and December 4, 1984, the flow rate estimates exceeded the 4 hour time limit by approximately 30 minutes.

Initial Conditions

On December 1 and December 4, 1984, the plant was in Cold Shutdown.

Status of Redundant or Backup Systems

Not Applicable

Nature of Occurrence

A Quality Assurance audit performed in April, 1985, revealed a potential problem in the documentation of the estimated flow rates for a Limiting Condition for Operation (LCO) which was in effect from November 30, 1984 to December 6, 1984. An LCO was entered under Technical Specification 3.3.7.11 when the circulating water system was shutdown, requiring dilution flow for effluent releases to be obtained from sources that have no flow rate measuring devices. Action 111 of Technical Specification 3.3.7.11 requires the flow rate to be estimated at least once per 4 hours during actual releases if flow rate measurement devices are inoperable.

This condition was a result of inadequate controls for documenting the required estimates. This deficiency was identified by a Quality Assurance audit which resulted in extensive revisions to the Daily Operating Log. Resolution of this concern was completed in July, 1985. It was believed, at that time, that no Technical Specification actions had been violated. After further evaluation of the reportability of the findings, it was determined on August 29, 1985 that a reportable condition had existed. Estimates of dilution flow were made approximately 30 minutes later than the required 4 hour interval during releases on December 1 and December 4, 1984.

Immediate Corrective Actions Taken

Not Applicable

Apparent Cause

On both occasions, operators failed to estimate the flow rate within the 4 hour time limit. Procedural controls were inadequate to ensure compliance with the action statement.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Supplemental Corrective Actions

On June 13, 1985, the Radioactive Discharge Controls procedure, 01-S-08-11, was revised to require the estimated flow rates to be documented on the Liquid Radwaste Discharge Permit Form whenever the required flow rate monitors are inoperable. This also transferred the responsibility for making the estimates from Control Room operators to the Radwaste operators who are more directly involved with the discharge evolution.

Safety Assessment

There was no threat to plant or public safety during the releases. Dilution flow was adequate during each discharge and no environmental release limits were exceeded.

MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi
P. O. BOX 1640, JACKSON, MISSISSIPPI 39215-1640

September 26, 1985

NUCLEAR LICENSING & SAFETY DEPARTMENT

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
File: 0260/L-835.0
Liquid Effluent Flow Rate
Estimate Exceeded LCO Time Limit
LER 85-032-0
AECM-85/0308

Attached is Licensee Event Report (LER) 85-032-0 which is a final report.

Yours truly,

L. F. Dale
Director

JRM/EBS/SHH:bms
Attachment

cc: Mr. J. B. Richard (w/a)
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Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
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