

CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
GRAND GULF UNIT NO. 1

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ABSTRACT

This EG&G Idaho, Inc. report provides a review of the submittals for Grand Gulf Nuclear Station Unit No. 1 for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3.

FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions based on Generic Implications of Salem ATWS Events." This work is conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of System Integration by EG&G Idaho, Inc., NRC Licensing Support Section.

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CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
GRAND GULF NUCLEAR STATION UNIT NO.1

1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28¹ was issued by D. G. Eisenhut, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on generic implications of the Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".²

This report documents the EG&G Idaho, Inc. review of the submittals from Grand Gulf Nuclear Station Unit No. 1 for conformance to items 3.1.3 and 3.2.3 of Generic Letter 83-28. The submittals and other documents utilized in this evaluation are referenced in section 4 of this report.

2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements for the Reactor Trip System (RTS) in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

The relevant submittals from the Grand Gulf Unit No. 1 were reviewed to determine compliance with items 3.1.3 and 3.2.3 of the Generic Letter. First, the submittals from this plant were reviewed to determine that these two items were specifically addressed. Second, the submittals were checked to determine if there were any post-maintenance test items specified by the technical specifications that were suspected to degrade rather than enhance safety. Last, the submittals were reviewed for evidence of special conditions or other significant information relating to the two items of concern.

The BWR Owners Group is presently addressing Generic Letter 83-28 item 4.5.3³ which is expected to result in proposed changes to the technical specification requirements for surveillance testing frequency and out-of-service intervals for surveillance testing and post-maintenance testing. The primary concern of item 4.5.3 is the surveillance testing intervals. Items 3.1.3 and 3.2.3 are specifically directed at post-maintenance test requirements. These concerns are essentially independent. However, the evaluations of these concerns are coordinated so that any correlation between these concerns will be adequately considered. Since no specific proposal to change the technical specifications have been proposed, there is no identifiable need at this time for correlating the reviews of item 4.5.3 with this review.

3. REVIEW RESULTS FOR GRAND GULF NUCLEAR STATION UNIT NO. 1

3.1 Evaluation

Mississippi Power and Light Company (MP&L), the licensee for Grand Gulf Nuclear Station Unit No. 1, provided responses to items 3.1.3 and 3.2.3 of Generic Letter 83-28 on November 4, 1983.³ Within the responses the licensee stated that a review of all technical specifications will be conducted to address item 3.1.3 and a response to item 3.2.3 will be provided on September 27, 1985. On December 14, 1984,⁴ the licensee provided an additional response for item 3.1.3, stating that MP&L had recently completed a detailed comprehensive technical specification review program which identified inconsistencies in technical specifications and verified technical accuracy and completeness of the specifications. MP&L believes that this review program represented a comprehensive review of the Grand Gulf Nuclear Station Unit No. 1 technical specifications and provided assurance that Grand Gulf can be operated safely and in accordance with the operating license. MP&L is participating in the BWR Owners Group Technical Specification Improvement Committee and will provide a final response on the results of the committee's efforts in their final response to item 3.2 scheduled for September 27, 1985. MP&L believes that the procedures currently in place to control post-maintenance testing meet the intent of item 3.1 of the generic letter and therefore considers this response final for item 3.1.3. A supplementary response to item 3.1.3 was provided by the licensee on January 16, 1985.⁵ Within that response, the licensee's evaluation for item 3.1.3 is that, following a review of the technical specifications, no post-maintenance test requirements were identified for the reactor trip system components which tended to degrade rather than enhance plant safety. The MP&L schedule for submittal of a response to item 3.2.3 remains September 27, 1985.

3.2 Conclusion

Based on the licensee's statement that they have reviewed their technical specification requirements for the RTS to identify any post-maintenance testing which could be demonstrated to degrade rather

than enhance safety and found none that degraded safety, we find the licensees' response for item 3.1.3 acceptable. The licensee's commitment to continue the review of incoming vendor information and engineering recommendations for information that could identify instances of potential degradation of safety caused by post-maintenance testing requirements provides additional assurance that the technical specifications will continue to provide a basis for safe plant operation and is acceptable.

The licensee has committed to respond to the concerns of item 3.2.3 by September 27, 1985; therefore, the staff will hold item 3.2.3 open pending receipt and assessment of the licensee's response to that item.

4. REFERENCES

1. NRC Letter, D. G. Eisenhower to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. Mississippi Power & Light Company letter to NRC, J. P. McGaughy Jr. to D. G. Eisenhower, Director, Office of Nuclear Reactor Regulation, NRC, "Grand Gulf Nuclear Station Units 1 and 2, Docket Nos. 50-416 and 50-417, License No. NPF-13, file: 0025/0272/L-860.0, Response to Generic Letter 83-28, AECM-83/0723." November 4, 1983.
4. Mississippi Power & Light Company letter to NRC, L. F. Dale to H. R. Denton, Director, Office of Nuclear Reactor Regulation, NRC, "Grand Gulf Nuclear Station Units 1 and 2, Docket Nos. 50-416 and 50-417, License No. NPF-29, File: 0025/L-860.0, Response to Generic Letter 83-28, Item 3.1, AECM-84/0533." December 14, 1984.
5. Mississippi Power & Light Company letter to NRC, L. F. Dale to H. R. Denton, Director, Office of Nuclear Reactor Regulation, NRC, "Grand Gulf Nuclear Station Units 1 and 2, Docket Nos. 50-416 and 50-417, License No. NPF-29, File: 0025/L-860.0, Supplementary Response to Generic Letter 83-28, Item 3.1.3, AECM-85/0004," January 16, 1985.