



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

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

October 11, 1985

O. D. KINGSLEY, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
File: 0260/0840/L-860.0
Proposed Amendment to the Operating
License (PCOL-85/12)
AECM-85/0218

On July 29, 1985, a meeting was held between members of the NRC staff and Mississippi Power & Light (MP&L). One of the subjects of discussion was the deferral of selected items which are currently required for completion during the first refueling outage. One of these items is installation of Automatic Depressurization System (ADS) air receiver pressure indication in the control room as currently required by License Condition 2.C.(33.g). In accordance with the provisions of 10 CFR 50.59 and 10 CFR 50.90, MP&L requests an amendment to License NPF-29, for Grand Gulf Nuclear Station (GGNS) Unit 1 to defer the installation of ADS air receiver pressure indication in the control room from the first to the second refueling outage. Since the outage is scheduled to commence in late Spring of 1986, an NRC response is requested by February, 1986 to allow time for planning and scheduling work.

MP&L is aggressively pursuing the implementation of required first refueling outage items. A seven week outage is currently in progress during which forty-five design change packages are scheduled for implementation. Many items required to be implemented during the first refueling outage will be completed during this fall outage. Despite this effort, fifty-seven work items will remain for implementation during the first refueling outage. This remaining large scope of work has necessitated an assessment of candidates for deferral in order to prevent significantly extending the completion time for the outage. MP&L's justification for the ADS pressure indication deferral request is based on the increased complexity that this job will add to planning the outage and the affect of this work on other outage work.

The majority of work for installation of ADS air receiver pressure indication must be performed in the upper drywell. Since there is a significant amount of work already scheduled in the drywell area and access to this area

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Member Middle South Utilities System

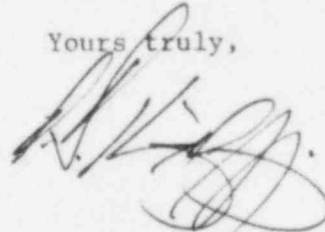
will be limited during the outage, MP&L believes it is prudent to limit the scope of work in the area. Also, this item is viewed as a system enhancement because of the adequacy of current administrative controls and testing performed on the system.

In accordance with the provisions of 10 CFR 50.30, three (3) signed originals and forty (40) copies of the requested amendment are enclosed. The attachment provides the complete technical justification and discussion to support the requested amendment. This amendment has been reviewed and accepted by the Plant Safety Review Committee (PSRC) and the Safety Review Committee (SRC).

Based on the guidelines presented in 10 CFR 50.92, it is the opinion of MP&L that this proposed amendment involves no significant hazards considerations.

Based on the guidance provided in 10 CFR 170.21, we have determined that the application fee is \$150. A remittance of \$150 is attached to this letter.

Yours truly,



ODK:rg

Attachments: GGNS PCOL-85/12

cc: Mr. J. B. Richard (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

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

Dr. Alton B. Cobb (w/a)
State Health Officer
State Board of Health
Box 1700
Jackson, Mississippi 39205

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

LICENSE NO. NPF-29

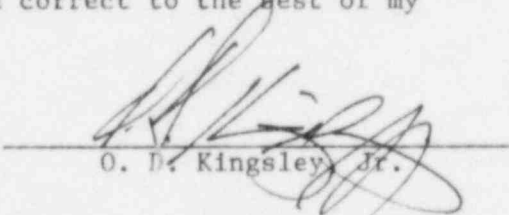
DOCKET NO. 50-416

IN THE MATTER OF
MISSISSIPPI POWER & LIGHT COMPANY
and
MIDDLE SOUTH ENERGY, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

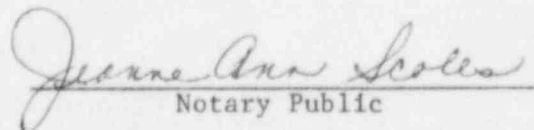
I, O. D. Kingsley, Jr., being duly sworn, stated that I am Vice President, Nuclear Operations of Mississippi Power & Light Company; that on behalf of Mississippi Power & Light Company, Middle South Energy, Inc., and South Mississippi Electric Power Association I am authorized by Mississippi Power & Light Company to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Vice President, Nuclear Operations of Mississippi Power & Light Company; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

STATE OF MISSISSIPPI
COUNTY OF HINDS


O. D. Kingsley, Jr.

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 17th day of October, 1985.

(SEAL)


Notary Public

My commission expires:

My Commission Expires Sep. 21, 1987

CHECK DATE 09/17/85 VENDOR US NUC REG COMM REMITTANCE ADVICE VENDOR NUMBER 929958 CHECK NO. 09-0051

INVOICE DATE	PURCHASE ORDER NO.	INVOICE NUMBER / DESCRIPTION	VOUCHER NUMBER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
091685		10CFR170 APPLICATION FEE AECM-85/0218	09-2153	15000		15000

DEPOSIT GUARANTY NATIONAL BANK
Jackson, Mississippi 39205

85-543
653



MIDDLE SOUTH ENERGY, INC.
P.O. BOX 1640 • JACKSON, MISSISSIPPI 39205
JOINT ACCOUNT

CHECK NO. 09-0051

CHECK DATE		
MO.	DA.	YR.
09	17	85

DOLLARS	CENTS
\$150	00

PAY
TO THE
ORDER OF

U.S. NUCLEAR REGULATORY
COMMISSION
WASHINGTON, DC 20555



SIGNED BY

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COUNTERSIGNED BY

SUBJECT: Facility Operating License No. NPF-29, page 13, License Condition 2.C.(33.g)

DISCUSSION: It is proposed that the subject license condition be amended to allow deferral of the installation of automatic depressurization system (ADS) air receiver pressure indication in the control room until the second refueling outage. An NRC response is requested by February, 1986 in order to allow time for planning and scheduling of work.

JUSTIFICATION: Current estimates of the scope of Grand Gulf's first refueling outage (57 work items) have necessitated an assessment of candidates for deferral. The subject license condition requires installation of instrumentation to measure ADS air system pressure for display in the control room prior to startup from the first refueling outage. MP&L's justification for deferral is based on the complexity of the job, the affects of the work on other outage work, the fact that it is a system enhancement, and the adequacy of current administrative controls and testing performed on the system.

Grand Gulf's first refueling outage is estimated to extend for approximately 13 weeks and will involve the implementation of several large, complex design changes. The critical path is controlled by design change implementation activities. The current schedule permits few delays without extending the completion time for the outage. The bulk of the physical work for installation of ADS pressure indication is to be performed in the upper drywell. Work in this area is difficult due to space limitations. This job will add increased complexity to the outage due to the significant amount of other work already scheduled in the drywell area including MSRV replacement, inspection of the ADS accumulator tanks, inspection and testing of snubbers, and inservice inspection work on the reactor pressure vessel. In addition, work in this area can only be performed for a limited time during the outage (an estimated 4 weeks of the currently scheduled 13 week outage) due to fuel movement and ADS testing activities. This makes it prudent that the scope of work be limited in this area in order to insure timely completion of scheduled activities without effecting the schedule.

MP&L has installed a mechanical pressure gauge on the discharge of the instrument air booster compressor to the ADS air receivers. This gauge is checked once every 24 hours in Operational Conditions 1, 2, and 3 with the reactor steam dome pressure greater than 135 psig. The pressure is recorded on the daily operating log per Grand Gulf procedure 06-OP-1000-D-0001. The acceptance criteria for this check requires Technical Specification Action Item 3.5.1.e.2 be entered when the pressure is less than or equal to 150 psig. Also, although there are currently no alarms associated with the ADS accumulator system, there is an alarm on the discharge of the instrument air booster compressor which will warn the control room operator of problems which could lead to a loss of pressure in the ADS accumulators.

The aforementioned pressure gauge is calibrated under the preventive maintenance program on a nominal eighteen month frequency to ensure its accuracy. In addition, an integrated leak test is performed on the ADS air system as described in MP&L letter dated October 24, 1983 (AECM-83/0672). Performance of this leak test verifies system integrity.

In conclusion, MP&L requests that the NRC approve this proposed operating license change. The current administrative controls and required testing for the system are adequate for detecting leakage. In addition, system components can be expected to be relatively leak free since this will only be the second cycle of operation.

MP&L plans to fulfill the other requirements of this license condition prior to startup from first refueling including performance of sampling to establish instrument air quality, and establishing surveillance procedures and Technical Specifications for the system. These actions will provide further assurance of the ADS air system integrity. The installation of pressure indication is a system enhancement and deferral will not degrade the current capabilities of the system.

SIGNIFICANT HAZARDS CONSIDERATION:

The proposed change to the operating license does not involve

- 1) a significant increase in the probability or consequences of a previously evaluated accident because the current administrative controls and testing for the system will be extended through a second cycle of operation, or
- 2) create the possibility of a new or different kind of accident from any previously evaluated accident because MP&L will continue to administratively control and test the system, nor
- 3) does it involve a significant reduction in a margin of safety because the current capabilities of the system will not be degraded.

Therefore, the proposed change does not involve a significant hazards consideration.