

November 1, 1985

Docket No: 50-416

Mr. Jackson B. Richard
Senior Vice President, Nuclear
Mississippi Power and Light Company
P.O. Box 23054
Jackson, Mississippi 39205

Dear Mr. Richard:

Subject: Grand Gulf Unit 1 - Request for License Amendment
to Defer Installation of ADS Air Receiver Pressure
Indication

DISTRIBUTION:

Docket No. 50-416

NRC PDR

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ACRS (16)

By letter dated October 11, 1985, Mississippi Power & Light Company (MP&L) requested an amendment to License Condition 2.C.(33)(g). The letter attached a brief discussion, justification, and significant hazards consideration. The proposed license amendment would extend the date for installation of pressure indication in the control room for the air receiver in the automatic depressurization system (ADS) from the first refueling to the second refueling. All other terms in License Condition 2.C.(33)(g) would be fulfilled.

The October 11, 1985, submittal is deficient in that it does not provide an analysis as required by 10 CFR 50.91(a)(1) using the three standards of 10 CFR 50.92. The no significant hazards consideration provided simply repeats the three standards and states, as a reason for these findings, that present administrative controls and testing for the ADS will be continued through the second fuel cycle. The justification refers to the increased complexity of the refueling outage work that would result from installing this instrument, the capability to continue the alternative measurements used during the first fuel cycle, and a statement of MP&L's opinion that the installation of the pressure indication is a system enhancement.

Provide an analysis to support a finding of no significant hazards consideration. The analysis should consider the fact that the requirement for installation of this pressure instrument at the first refueling outage is not solely a system enhancement. From a safety viewpoint the installation of this instrument is a requirement of the operating license and is part of the basis for the NRC staff's safety evaluation and finding that the plant can be operated without endangering the health and safety of the public. The analysis should consider the increased probability or consequences of accidents previously evaluated in the Final Safety Analysis Report and other submittals. For example, the ADS system is used in safety analyses for loss of coolant accidents and safe shutdown following a fire. Consider the effect of the reactor operator not having available the continuous indication of adequate air pressure in the air receivers to actuate the safety relief valves. Consider licensing event reports on Grand Gulf and other BWRs which describe system and human errors resulting in air receiver pressure less than the design basis presented in the FSAR. Consider

the increase in probability of an accident, without use of air receivers because of low pressure, caused by operation twice as long (two refueling cycles versus one fuel cycle). Similarly, the analysis should consider the effect on the other two standards of 10 CFR 50.92 of operating the second fuel cycle without the benefit of having ADS air receiver pressure indicated in the control room.

Provide also a description of the complexity of the work involved in installing this instrument in the first refueling cycle. For example, describe the work including the equipment (instrument, tubing, wiring) to be installed, the time to install and test, and the number of days the scheduled outage would need to be extended to complete the work.

In order to complete our review of this proposed license amendment by February 1986, as you requested, you are requested to provide this information by November 22, 1985. If you cannot meet this date please advise the NRC Project Manager for Grand Gulf Nuclear Station within 7 days of receipt of this letter.

Sincerely,

Original Signed by

Carl R. Stahle for

Elinor G. Adensam, Chief
Licensing Branch No. 4
Division of Licensing

cc: See next page

JMC
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10/1/85

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Mr. Jackson B. Richard
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Grand Gulf Nuclear Station

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