

1 UNITED STATES OF AMERICA

2 NUCLEAR REGULATORY COMMISSION

3 - - -

4 DISCUSSION OF INVESTIGATIONS AND
5 POSSIBLE ENFORCEMENT ACTIONS

6 - - -

7 CLOSED MEETING - EXEMPTIONS 5 & 7

8 - - -

9 Room 1130
10 1717 H Street, N.W.
11 Washington, D.C.

12 Thursday, July 26, 1984

13 The Commission met, pursuant to recess, at 1:37 p.m.

14 COMMISSIONERS PRESENT:

15 NUNZIO PALLADINO, Chairman of the Commission
16 THOMAS ROBERTS, Commissioner
17 JAMES ASSELSTINE, Commissioner
18 FREDERICK BERNTHAL, Commissioner

19 STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:

20 S. CHILK
21 R. BURCH
22 B. HAYES
23 W. DIRCKS
24 J. O'REILLY
25 D. DeYOUNG
R. LEVI
G. MESSENGER

AUDIENCE SPEAKERS:

E. CASE
H. THOMPSON
E. GOODWIN

8509060224 850820
PDR FOIA
BELL84-665 PDR

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CHAIRMAN PALLADINO: We will get OIA up here.

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I should note the staff has left, and we have George Messenger from OAI to talk about the inquiry conducted in connection with the 2.206 petition regarding Grand Gulf.

George, can you proceed?

MR. MESSENGER: First of all, what we are doing, we have before us -- and I am prepared for more detail if you so desire at this meeting.

CHAIRMAN PALLADINO: Can you highlight them?

MR. MESSENGER: Yes. A petition dated April 10, 1984, submitted pursuant to 10 CFR 2.206 by Jacksonians United for Livable Energy Policies -- acronym JULEP -- three matters of possible OIA interest were raised as follows:

a. "possible improprieties and illegal acts by NRC inspectors and investigators;"

b. "the handling by OIA of the improprieties which have been previously identified;" and

c. "the effectiveness of NRC Region II in fulfilling the mandated responsibility to enforce the regulations of the NRC which exist to ensure protection of public health and safety."

Thus far, interviews were conducted to determine whether JULEP had specific allegations of misconduct which would demonstrate the matters raised in their petition presented above.

Field work into the two allegations thus identified has been completed and a report on the results of that effort is in preparation.

Now I'm prepared, if you would like, at this

1 meeting to go into detail who we interviewed and the results
2 thss far.

3 CHAIRMAN PALLADINO: Well, I think we would be
4 interested in knowing your general finding on each of these
5 points, whether there were specific allegations that supported
6 them. If you found that these allegations were well
7 substantiated.

8 MR. MESSENGER: Okay.

9 CHAIRMAN PALLADINO: Whether anybody in your
10 opinion did something wrong.

11 MR. MESSENGER: Okay. Ken Lawrence, a JULEP
12 member, was interviewed and he alleged that he and another
13 JULEP member were barred from a meeting at the plant site
14 because the NRC was discussing a draft inspection report
15 with the licensee.

16 Cynthia Stuart, author of the JULEP petition,
17 alleged that NRC staff had improperly handled the issue
18 of technical specifications for Grand Gulf containment.
19 They had approved specifications for a MARK-II containment
20 which Grand Gulf does not have.

21 Stuart had no other allegations to demonstrate
22 the broad negative comments about NRC presented in her
23 2.206 petition and specifically agreed she was probably in
24 error in her reference to OIA.

25 OIA has not investigated anything at Grand Gulf

1 prior to this petition.

2 The results that we found:

3 It was found that the licensee draft inspection
4 reports were under discussion and that Lawrence was barred
5 on the basis of protecting licensee proprietary information.

6 CHAIRMAN PALLADINO: Was it an NRC inspection
7 report or licensee?

8 MR. MESSENGER: Licensee.

9 CHAIRMAN PALLADINO: Licensee inspection report
10 that would have been discussed.

11 MR. MESSENGER: Because no draft inspection report
12 was being discussed, this allegation was unfounded.

13 The staff has already responded to the Commission
14 on the MARK-II containment issue in March of this year. More
15 recently, an enforcement action for submission of material
16 false statement in connection with this issue has been
17 suggested, and we note from our references, it was the
18 Eisenhut memo of July 17, 1984.

19 CHAIRMAN PALLADINO: Is there an investigation
20 going on on that?

21 COMMISSIONER ASSELSTINE: I think just what was
22 described to us.

23 MR. MESSENGER: Yes, I think that was --

24 MR. GOODWIN: They are determining whether they
25 are going to find it's a material false statement. The

1 Eisenhut memo was a suggestion that they make that
2 determination.

3 COMMISSIONER ASSELSTINE: Yes. That's what Dick
4 DeYoung is going to report to us on on Tuesday, yes.

5 CHAIRMAN PALLADINO: Yes.

6 MR. MESSENGER: What we have found there, that this
7 issue has been adequately aired by the staff and consequently
8 there appears to be no remaining issue requiring further
9 investigative activity by OIA into this matter.

10 We were presented with the interviews that we
11 conducted, the paperwork on this. And it looks like it's
12 pretty well aired before the -- in the agency and before
13 the Commission.

14 CHAIRMAN PALLADINO: Okay, any questions or
15 comments?

16 Let me ask OGC, how do we respond to a 2.206
17 petition of this nature when OIA is involved, rather than
18 the staff? Does OGC respond, or --

19 MR. LEVI: I think the easiest way to do it would
20 be just to have OIA respond and to tell them that raises
21 matters more proper for investigation by OIA, and they have
22 looked at them, and accordingly it has not been treated as
23 a formal 2.206 petition.

24 Because it is labeled a 2.206 petition does not
25 necessarily make it a 2.206 petition.

1 CHAIRMAN PALLADINO: All right. So, a direct
2 response from OIA is the appropriate vehicle?

3 MR. LEVI: I would think so, yes.

4 CHAIRMAN PALLADINO: You agree, as far as you know?

5 MR. MESSENGER: That's an "unknown" to me. What
6 I intend to do is provide the report to the Commission. So,
7 in effect what we would be talking about is the disposition
8 of that report.

9 CHAIRMAN PALLADINO: It somehow intuitively feels
10 like an OGC action to me. The reason I bring it up is so
11 it doesn't fall in the cracks. Ordinarily, it would be a
12 Denton matter and he would pick it up and carry it forward.

13 This is a little more unusual, at least in my
14 experience.

15 MR. MESSENGER: Any of our reports, it always
16 comes up and the Commission gets a vote on releasability in
17 conjunction with OGC. And that is what apparently we are
18 talking about here.

19 COMMISSIONER ASSELSTINE: Yes.

20 George, when are you going to have the report done?

21 CHAIRMAN PALLADINO: What's that?

22 COMMISSIONER ASSELSTINE: I was wondering when
23 George was going to have the report done.

24 MR. MESSENGER: My target is the end of next
25 week, before I go on leave. I'll be going on a week's leave.

1 So, that's the target. They are writing it right now.

2 COMMISSIONER BERNTHAL: Well, let's see, I assume
3 that you are -- were you asking that to find out the
4 possible coincidence with the vote, or --

5 COMMISSIONER ASSELSTINE: Well, I was mostly
6 interested in when he was going to have the written report
7 done in terms of, yes, how much time would drag on beyond
8 the beginning of next week, yes.

9 COMMISSIONER BERNTHAL: I see.

10 MR. MESSENGER: The interviews are all written
11 right now.

12 COMMISSIONER ASSELSTINE: Yes, all the field work
13 is done.

14 MR. MESSENGER: Yes.

15 CHAIRMAN PALLADINO: But you raise the question,
16 should it be done before we take the vote? It would be
17 nice.

18 COMMISSIONER ASSELSTINE: It would be nice. But I
19 gather it's impossible.

20 MR. MESSENGER: Yes, I think that's -- with our
21 own internal process because once it is written, it gets an
22 AD review, it gets an accuracy check, and then it comes to me.

23 COMMISSIONER ASSELSTINE: Yes.

24 MR. MESSENGER: That in itself would -- it takes a
25 few days.

1 COMMISSIONER ASSELSTINE: You have talked to the
2 people that provided the 2.206 petition. Did they indicate
3 anybody else that they thought you ought to talk to in terms
4 of following up on it?

5 MR. MESSENGER: No, that was it. These two
6 people, that's what we've gotten.

7 COMMISSIONER ASSELSTINE: And you followed up on
8 the two items, specific information that they provided to
9 you. You have resolved them in the way that you have
10 described.

11 MR. MESSENGER: Yes.

12 CHAIRMAN PALLADINO: Can I come back to my
13 question. Is OGC going to follow through and make sure
14 this is responded to --

15 MR. LEVI: Certainly.

16 CHAIRMAN PALLADINO: -- appropriately. I'll leave
17 whatever "appropriate" --

18 MR. LEVI: When OIA submits the report, OGC will
19 see that it is taken care of.

20 CHAIRMAN PALLADINO: All right. Anything more that
21 we should discuss on this matter? Any more that we should
22 discuss on investigations and related topics, regarding
23 particularly Grand Gulf?

24 COMMISSIONER ASSELSTINE: No.

25 CHAIRMAN PALLADINO: Is it appropriate to adjourn

1 the meeting?

2 COMMISSIONER ASSELSTINE: Yes.

3 CHAIRMAN PALLADINO: Okay. Thank you. We'll
4 stand adjourned.

5 (Whereupon, at 2:45 p.m., the meeting of the
6 Commission was adjourned.)

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1 NUCLEAR REGULATORY COMMISSION

2 This is to certify that the attached proceedings
3 before the Nuclear Regulatory Commission in the matter of:

4 Discussion of Investigation and Possible
5 Enforcement Action

6 Date of Proceeding: July 26, 1984

7 Place of Proceeding: Washington, D.C.,

8 were held as herein appears and that this is the original
9 transcript thereof for the file of the Commission.

10 *M. E. Hansen*

11

Reporter. M.E. Hansen

July 17, 1984

DISTRIBUTION:

Docket No. 50-416
LB #4 r/f
EAdensam
MDuncan
DHouston
LKintner
DEisenhut/RPurple

MEMORANDUM FOR: Jane A. Axelrad, Director
Enforcement Staff
Office of Inspection & Enforcement

FROM: Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

SUBJECT: GRAND GULF - MATERIAL FALSE STATEMENT

On March 13, 1984, Representative E. Markey wrote to the Commission requesting responses to certain questions. One question (Enclosure 1) asked the Commission's view as to the errors in Grand Gulf TS and surveillance procedures constituting material false statements.

On December 15, 1980, the licensee submitted a markup of the Standard Technical Specifications for General Electric Boiling Water Reactors (NUREG-0123) which he stated reflected plant specific design factors. Additional submittals and changes were transmitted in letters dated June 26, and December 31, 1981, January 12, February 25, March 23, April 5, 6, 7 and 30, May 26, June 1, 9 (2 letters) and 10, 1982. Copies of the transmittal letters are included as Enclosure 2.

On June 16, 1982, NRC issued a low power (5%) license to MP&L for Grand Gulf Unit 1 with appended TS.

Contact:
L. Kintner, NRR
X27038

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CF

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Jane A. Axelrad

- 2 -

Original signed by
Darrell G. Eisenhower

Darrell G. Eisenhower, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Question 10(a)
2. Copies of transmittal letters

cc: J. Lieberman
T. Novak
H. Denton
F. Miraglia

MDH
DL:LB #4
DHouston/hmc
6/27/84

LK
DL:LB #1
LKintner
6/28/84

EA
DL:LB #4
EAconsam
6/28/84

with question
DL
AD:DL
TNovak
6/28/84

DD:DL
RPurple
6/ /84

DL
DL:DL
DEisenhut
6/12/84

QUESTION 10. (A) THE COMMISSION'S REGULATIONS AT 10 CFR 50.100 STATE THAT A LICENSE MAY BE REVOKED OR SUSPENDED "FOR ANY MATERIAL FALSE STATEMENT IN THE APPLICATION FOR A LICENSE OR IN THE SUPPLEMENTAL OR OTHER STATEMENT OF FACT REQUIRED OF THE APPLICANT", OR, BECAUSE OF "CONDITIONS REVEALED...THAT WOULD WARRANT THE COMMISSION TO REFUSE TO GRANT A LICENSE ON AN ORIGINAL APPLICATION..." DOES THE COMMISSION CONSIDER THAT THE ERRONEOUS TECHNICAL SPECIFICATIONS AND SURVEILLANCE PROCEDURES SUBMITTED BY MP&L FOR GRAND GULF CONSTITUTE EITHER A MATERIAL FALSE STATEMENT OR A FALSE STATEMENT OF FACT?

RESPONSE

A DETERMINATION HAS NOT BEEN MADE AS TO WHETHER OR NOT THE ERRONEOUS TS SUBMITTAL CONSTITUTES A MATERIAL FALSE STATEMENT. THIS MATTER IS UNDER CONSIDERATION.

ENCLOSURE 2

COPIES OF TRANSMITTAL LETTERS



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

December 15, 1980

NUCLEAR PRODUCTION DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director

Dear Sir:

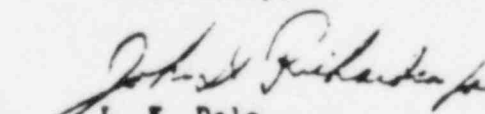
SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
File 0260/0277/15180
Submittal of Technical
Specifications
AECH-80/291

Enclosed is the initial submittal of the Technical Specifications for Unit 1 of the Grand Gulf Nuclear Station. This submittal consists of a markup of NUREG-0123, Standard Technical Specifications for General Electric Boiling Water Reactors, to reflect plant specific design factors.

In accordance with the discussion between our Mr. John D. Richardson and Mr. Bob Bottimore of the NRC on November 12, 1980, one copy of the Grand Gulf markup of NUREG-0123 is enclosed. Also, in accordance with the referenced November 12, 1980, conversation and other previous conversations with Mr. Bottimore, the Grand Gulf submittal has been developed on the basis of Revision 2 (August, 1979) of NUREG-0123.

We would request that we be advised as soon as possible of your schedule for review of this submittal. Please advise us of any additional clarification which may be required or of any followup meetings or discussions that you may determine to be appropriate.

Yours truly,


L. F. Dale
Nuclear Project Manager

CLT/JDR/LFD:lm
Enclosure

cc: (See Next Page)

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EXCL TO
TERA (REVIEW
TO FILES)

MISSISSIPPI POWER & LIGHT COMPANY

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation

AECH-80/291

Page 2

cc: Mr. N. L. Stampley (w/o)
Mr. G. B. Taylor (w/o)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)

Mr. Victor Stello, Jr., Director (w/o)
Division of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi
P. O. BOX 1840, JACKSON, MISSISSIPPI 39205

June 26, 1981

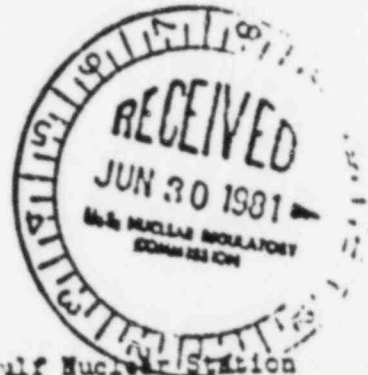
NUCLEAR PRODUCTION DEPARTMENT

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

ATTN: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
File 0260/0277/15180
Submittal of Technical
Specifications
AECM-81/213

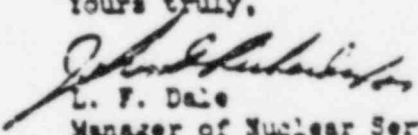


Enclosed is the second submittal of the Standard Technical Specifications for Unit 1 of the Grand Gulf Nuclear Station.

Grand Gulf Unit 1 Technical Specifications were originally submitted via AECM-80/291 (December 15, 1980) and subsequently revised by your Mr. Bottimore. This submittal is a markup copy of Mr. Bottimore's revision.

Changes have been indicated by margin bars, which will aid you in your review. If you identify subsequent changes, if any, in this manner, future reviews will be more expedient. We request that you advise us as soon as possible of your intended review schedule and your need for additional clarification.

Yours truly,


L. F. Dale
Manager of Nuclear Services

WJK/SHH/JCR:km

Attachment:

cc: Mr. W. L. Stapley
Mr. R. B. McGehee
Mr. T. B. Conner
Mr. G. B. Taylor

Mr. Victor Stello, Jr., Director
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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SEND Encl. to:
REC F.163

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MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

December 31, 1981

NUCLEAR PRODUCTION DEPARTMENT

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
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0260/0653/5011/15180
Proposed Technical Specification
for Containment Leakrate
AECM-81/510

Our letter to you, AECM-81/213, dated June 26, 1981, transmitted our proposed changes to the Grand Gulf Standard Technical Specifications (STS). In that transmittal (subsection 3.6.1.2), containment leakage was limited to 0.437% by weight of containment air for a 24 hour period at a test pressure of 11.5 psig.

The most recent "Proof and Review" version of this section (dated November 20, 1981), provided to MP&L for concurrence by R. Bottimore of your office, reduced this allowed leakage value. In subsequent telephone conversations held December 22 and 23, 1981, between J. Read of Accident Evaluation Branch and members of the staffs of MP&L and Bechtel Power, information was provided justifying the original value proposed in our letter of June 26, 1981, referenced above. A summary of the calculational basis for the 0.437% leakage criteria, as discussed with Mr. Read, is provided as Attachment 1 to this letter.

As detailed in Attachment 1, the MP&L proposed leakrate criteria includes the total leakage from the main steam isolation valves (MSIV). This is appropriate because the integrated leak rate test at Grand Gulf is conducted with the drywell and containment volumes communicating and with the reactor vessel vented to the drywell atmosphere. In this configuration test pressure will be applied to the MSIV's.

The proposed leakrate limit of 0.437% was used in the analysis of offsite and control room personnel radiation exposure. As stated in FSAR subsection 15.6.5, the analysis results indicated that calculated doses are within the guidelines of 10 CFR 100 and General Design Criteria 19, and Appendix A to 10 CFR 50.

On the basis of the referenced conversations, it is our understanding that Accident Evaluation Branch will recommend a technical specification change based on the following MP&L commitments. We assume this will result in a revised "Proof and Review" version of STS subsection 3.6.1.2.

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MISSISSIPPI POWER & LIGHT COMPANY

AECM-81/510
Page 2

1. Containment leakage rate shall be limited to an overall integrated leakage rate of less than or equal to 0.437% by weight of the combined containment and drywell air per 24 hours at the prescribed test pressure.
2. With regard to leakage past the main steam isolation valves, the combined leakage from all main steam lines (four) shall not exceed 100 SCF per hour.
3. Appropriate surveillance testing of each main steam isolation valve will be conducted at intervals no greater than 18 months.

If additional information or clarification is required, please advise this office.

Yours truly,



L. F. Dale
Manager of Nuclear Services

JGC/JDR:ph

Attachment 1: Containment Leakrate Criteria

cc: Mr. N. L. Stampley (w/o)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)
Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/o)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Containment Leakrate Criteria

Presented below is a summary of the method used to calculate an allowed leakage criteria for the containment's overall integrated leak rate test.

Information used in calculations: (See FSAR Table 6.2-1)

Net free volumes, cu.ft.,	Drywell	270,128
	Containment	1,400,236
	Total	1,670,364

Design containment leakage	.35% (See Note 1)
(volume percent, containment only)	
MSIV leakage criteria, SCF per hour	100
(total allowed for four main steam lines)	

1. Leakage in SCFH associated with containment design value (.35 volume %).

$$\frac{.35 \times 10^{-2} \times 1.400232 \times 10^6}{24} = 204.20 \text{ SCFH}$$

2. Total containment leakage allowed including main steam lines.

$$100 + 204.20 = 304.20 \text{ SCFH}$$

3. Overall leakage criteria, based on total volume of containment and drywell.

$$\frac{304.20 \times 24 \times 100}{1.670364 \times 10^6} = 0.437\%$$

(In this calculation weight and volume percentages are equivalent.)

Note 1: As discussed with J. Read of Accident Evaluation Branch in a telephone conversation held December 23, 1981, with G. Cesare of Mississippi Power & Light, an error was noted in FSAR Table 6.2-1. This table incorrectly states that the design leakage of .35% is based on the combined volume of the drywell and containment. This value is based on the containment volume only. FSAR Table 6.2-1 will be revised in the next available amendment to correct this error.



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1840, JACKSON, MISSISSIPPI 39205

January 12, 1982

NUCLEAR PRODUCTION DEPARTMENT

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
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0260/15180
Revisions to GCNS Draft Radiological
Effluent Technical Specifications
AECM-82/19

Recent conversations between representatives of Mississippi Power & Light Company and the Nuclear Regulatory Commission have revealed the need for revising selected pages in the Grand Gulf Nuclear Station Radiological Effluent Technical Specifications (RETS) and the Offsite Dose Calculation Manual (ODCM). Accordingly, the revised pages are enclosed for your review and insertion.

Please contact us if you have any questions.

Yours truly,

L. F. Dale
Manager of Nuclear Services

LRM/IDR:rg

cc: Mr. N. L. Stamper (w/o)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)
Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/o)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/o)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

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MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1840, JACKSON, MISSISSIPPI 39205

March 23, 1982

NUCLEAR PRODUCTION DEPARTMENT

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
Units 1 and 2
Docket Nos. 50-416 and 50-417
File No. 0260/L-334.0/L-350.0
Additional Response to Concerns
of Licensee Qualification
Branch
AECM-82/49



In this letter Mississippi Power & Light Co. (MP&L) operator of Grand Gulf Nuclear Station on behalf of Middle South Energy, Inc. and South Mississippi Electric Power Association, is submitting responses to specific concerns expressed by the Licensee Qualifications Branch as well as changes made in the FSAR necessitated by recent organizational changes at MP&L.

As Grand Gulf Nuclear Station (GCNS) Unit No. 1 approaches the operational phase, Mississippi Power & Light Company (MP&L), operator of GCNS on behalf of Middle South Energy, Inc. and South Mississippi Electric Power Association, has made certain organizational changes to insure a smooth transition for operation of Unit 1, resumption of construction of Unit 2 and the most expeditious use of the Grand Gulf staff.

Attachment A to this letter presents a brief description of the details to be found in Attachments 1 through 13.

Should you have any questions, please advise.

Yours truly,

L. F. Dale
Manager of Nuclear Services

PJR/JDR:ph
Attachments

cc: See next page

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MISSISSIPPI POWER & LIGHT COMPANY

cc: Mr. N. L. Stampley (w/a)
Mr. R. B. McGehee (w/a)
Mr. T. B. Conner (w/a)
Mr. G. B. Taylor (w/a)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

April 5, 1982

NUCLEAR PRODUCTION DEPARTMENT

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
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0260/15180/L-860.0
Technical Specifications
AECM-82/115

The purpose of this letter is to formally transmit Mississippi Power & Light Company's position on proposed changes to the Standard Technical Specifications that have previously been discussed informally with the Licensing Guidance Branch. Additional proposed changes to the Standard Technical Specifications regarding the Corporate Safety Review Committee (Technical Specification 6.5.2) were provided in AECM-82/49, dated March 23, 1982.

These proposed changes are included as an attachment to this letter and include the current "Proof and Review" page with proposed changes identified; and, additional justification if required.

Please advise if additional information is required.

Yours truly,


L. F. Dale

Manager of Nuclear Services

WWK/SHH/JDR:lm
Attachment

cc: Mr. N. L. Stampley (w/a)
Mr. R. B. McGehee (w/a)

Mr. G. B. Taylor (w/a)
Mr. T. B. Conner (w/a)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, GA 30303

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2pp. ber Middle South Utilities System

Attachment 1 to AECM-82/115

Grand Gulf Unit 1 Technical Specification Pages 3/4 1-3 & 1-4, dated December 18, 1981

- 1) Specification 3.1.3.1, Action a: As written, this does not allow credit for a fully inserted control rod.
- 2) Specification 3.1.3.1, Action b.1: As written, this does not allow credit for a fully inserted control rod nor is the option for restoring the inoperable control rod to operable allowed.
- 3) Specification 3.1.3.1, Action b.1.b): If a rod is able to be tripped (i.e., can be scramed), but not able to be moved, it is not practical to do this test. The footnote * would also be deleted.
- 4) Specification 3.1.3.1, Action b.1: This is redundant to 3.1.3.1.b.2. Add the words "within one hour" and delete 3.1.3.1.b.2 and Footnote **.
- 5) Specification 4.1.3.1.2.b: This is added to lend consistency with the above changes.



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

NUCLEAR PRODUCTION DEPARTMENT

February 25, 1982

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

Attention: Mr. Darrel G. Eisenhut, Director

Dear Mr. Eisenhut:



SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0260/16360
Control of Heavy Loads
AECM-82/17

This letter is being sent to you to supply certain corrections to the Heavy Load Report submitted to your office with AECM-81/427 dated November 23, 1981. In that report our plant specific definition of a heavy load was changed from 750 pounds to 1140 pounds or from the weight of a channeled fuel assembly to the weight of a channeled fuel assembly plus its associated handling tool as defined in NUREG-0612.

The change was made in Footnote 1 of Table 4 on page 18 and in the proposed Technical Specifications for the fuel storage fuel pools, 3/4.9.7, and Jib crane, 3/4.3.13. However 1140 pounds is greater than the rated capacity of the Jib crane, (1/2 ton), therefore since the limitation to 1140 pounds is meaningless, the latter technical specification is being deleted. Reference to the proposed Jib crane Technical Specification is also being deleted on page 10.

Two more references to the heavy load definition have been changed. On the attached replacement to page 12 the words "and its associated handling tool" are added to Footnote (1) and on the attached replacement to page 15 in the New Fuel Bridge Crane paragraph, 750 has been changed to 1140 in line six.

Attached are the required replacement pages. Instructions for revision of the Grand Gulf six months Heavy Loads report are as follows:

Remove

Page 10
Page 12
Page 15
Page 18
Technical Specifications
3/4.9.7
3/4.9.13 (2 pages)

Replace With

Page 10-Rev. 1
Page 12-Rev. 1
Page 15-Rev. 1
Page 18-Rev. 1
3.4.9.7 Rev. 1
delete

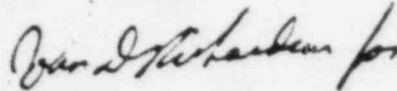
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MISSISSIPPI POWER & LIGHT COMPANY

AECH-82/17
Page 2

If you have any questions please advise.

Yours truly,



L. F. Dale
Manager of Nuclear Services

PJR/JDR:ph
Attachments

cc: Mr. N. L. Stampley
Mr. R. B. McGehee
Mr. T. B. Conner
Mr. G. B. Taylor

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

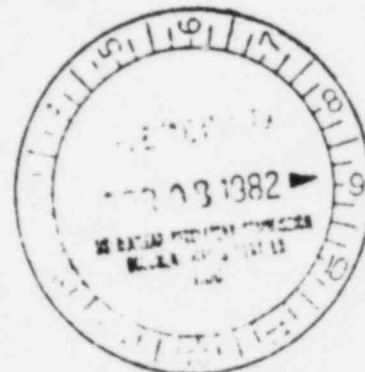
April 6, 1982

NUCLEAR PRODUCTION DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

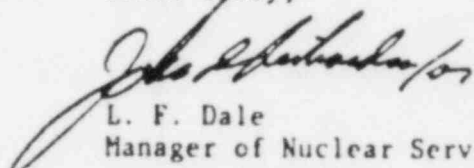


SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0260/15180/L-860.0
Technical Specifications
Reference: AECH-82/115, dated
April 5, 1982
AECH-82/136

The purpose of this letter is to transmit a corrigendum to the previously transmitted reference. This page is attached.

Please advise if additional information is required.

Yours truly,


L. F. Dale
Manager of Nuclear Services

WWK/SHH/JDR:lm
Attachment

cc: Mr. N. L. Stampley (w/a)
Mr. G. B. Taylor (w/a)
Mr. R. B. McGehee (w/a)
Mr. T. B. Conner (w/a)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

Boo!
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A PDR

Member Middle South Utilities System

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be *Review of* ~~reviewed~~ *The Responsibility of* by the PSRC and ~~approved by~~ the Plant Manager prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the PSRC and approved by the Plant Manager within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

- a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the:

1. RCIC system outside containment containing steam or water, except the drain line to the main condenser.
2. RHR system outside containment containing steam or water, except the line to the LRW system and headers that are isolated by manual valves.
3. HPCS system.
4. LPCS system.
5. Hydrogen analyzers of the combustible gas control system.



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

April 7, 1982

NUCLEAR PRODUCTION DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director

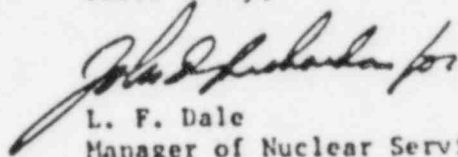
Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
File: 0260/15180
Plant Staff Working Hours
AECM-82/132



In regard to the "Publication of Policy Regarding Nuclear Power Plant Staff Working Hours" contained in Volume 47, Number 33 of the Federal Register dated February 18, 1982, page 7352, Mississippi Power & Light (MP&L) is changing its earlier commitment by incorporating the changes in the above publication into the Grand Gulf Technical Specifications (page 6-2 attached). These same changes are being incorporated into the appropriate operating procedures for Grand Gulf and will be submitted in a forthcoming FSAR amendment.

Yours truly,


L. F. Dale
Manager of Nuclear Services

RMS/SHH/JDR:rg

Attachment

cc: Mr. N. L. Stampley (w/n)
Mr. R. B. McGehee (w/a)
Mr. T. B. Conner (w/a)
Mr. G. B. Taylor (w/a)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. J. P. O'Kelly, Regional Administrator (w/a)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

Boo!
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A PDR

1 P. Member Middle South Utilities System

UNIT STAFF (Continued)

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions; e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period, all excluding shift turnover time.
3. A break of at least eight hours should be allowed between work periods, including shift turnover time.
4. The use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the ~~Plant Superintendent~~ or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the ~~Plant Superintendent~~ or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

UNIT STAFF (Continued)

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MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39206

April 30, 1982

NUCLEAR PRODUCTION DEPARTMENT

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
Units 1 and 2
Docket Nos. 50-416 and 50-417
File: 0272/M001.0
FSAR and Technical Specification Changes
Pertaining to RPS Circuit Response
Times
AECM-82/142



This transmittal is provided to inform the NRC of proposed changes to the GGNS FSAR and Technical Specifications as a result of actual delay response time measurements performed on the Turbine Stop and Control Valve Closure circuits and the RPV Water Level Transmitter circuits.

During response time testing several of the main turbine stop and control valves circuits failed to meet the 70 msec. total maximum response time specified in the GGNS Technical Specifications (Table 3.3.1-2). During similar testing, the RPV water level transmitters circuits failed to meet the Technical Specification total response times of 300 msec.

As a result of the higher measured total response times, the GGNS Technical Specification limits require revision in order that the limiting conditions for operation can be established for these circuits. The specification for total response time for the turbine stop and control valves (presently 60 and 70 msec., respectively) has been increased to 100 msec. for both circuits. The RPV water level transmitter total response time has been increased from 300 msec. to 1.05 seconds. These changes have been provided to Mr. Bottimore of the NRC and have been incorporated into the proof and review copy of the GGNS Technical Specifications. The revised proof and review copy of Table 3.3.1-2 is provided in Attachment 1.

The primary effect to be experienced from the longer response times will be on the transient analyses performed for Grand Gulf, due to the additional delay time prior to initiation of reactor scram.

The most limiting transient for Grand Gulf, which is the Loss of Feedwater Heating (Manual Flow Control), is controlled by the high flux initiated scram and is, therefore, unaffected by either response time change being proposed.

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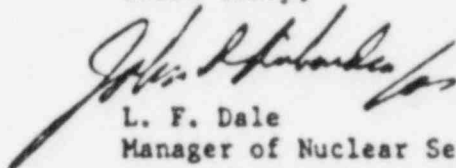
The limiting transients which are effected by a turbine control and stop valve scram trip signal are the Generator Load Rejection without Bypass, Generator Load Rejection with Bypass, and the Turbine Trip without Bypass. Each of these transients, which are pressurization transients, were reanalyzed using the ODYN Code to determine their effect on reduction in the minimum critical power ratios (MCPR). The Feedwater Controller Failure at Maximum Demand is the limiting transient effected by a longer RPV water level transmitter response time. Likewise, a reanalysis of this transient was performed with the longer total response time of 1.05 seconds. In each case, no significant change in CPR's was observed, and the MCPR's as reported in FSAR Table 15.0-1 (Amendment 55, April, 1982) are accurate.

Therefore, for the GCNS transient analyses, it has been determined that no effect on the ability to safely operate the plant will be experienced from a change in these response times.

In order to avoid potential misinterpretation between the FSAR and the Technical Specifications, FSAR Table 7.2-5 is being deleted as it presently exists and the total response times, used as transient analysis input parameters, will be included in the response to NRC Question 211.134. The proposed FSAR revisions are provided in Attachment 2. The incorporation of these proposed revisions into the FSAR will be made pending the receipt of further guidance from the NRC in regard to post-operating license FSAR amendments.

Please advise if any additional information is required.

Yours truly,



L. F. Dale
Manager of Nuclear Services

SAB/JGC/JDR:rg

Attachments

cc: Mr. N. L. Stampley (w/a)
Mr. R. B. McGehee (w/a)
Mr. T. B. Conner (w/a)
Mr. G. B. Taylor (w/a)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/a)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

504



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

May 26, 1982

NUCLEAR PRODUCTION DEPARTMENT

Mr. Walter P. Haass, Chief
Quality Assurance Branch
Division of Engineering
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Haass:

SUBJECT: Grand Gulf Nuclear Station
File 0272/0490/0491/15020
GGNS Tech Specs. 6.5.2.8
AECH-32/225

As a result of recent telephone discussion between your Mr. J. Gilray, Mr. Benedict of Licensee Qualification Branch and MP&L's Mr. W. Edge and I, MP&L is submitting the following interpretation of the Grand Gulf Technical Specification Section 6.5.2.8.

Technical Specification 6.5.2.8 begins: "Audits of unit activities shall be performed under the cognizance of the SRC. These audits shall encompass: ...". MP&L interprets these words as follows:

"The SRC shall review the results of audits (or summaries thereof) of nuclear activities conducted in accordance with the MP&L Operational Quality Assurance Manual. Audits shall be conducted and results (summaries) shall be reviewed in the areas of: ..."

It is MP&L's understanding that the NRC does not choose to allow MP&L or other licensees to modify the Standard Technical Specification wording in 6.5.2.8, but does allow for the above type of interpretation.

Unless notified to the contrary, MP&L intends to implement the stated interpretation (as we have stated) immediately. Further MP&L intends to submit a change in Revision 3 to the MP&L QA Topical Report (MPL-TOP-1A) to state this interpretation and seek "formal" NRC acceptance.

Boo!

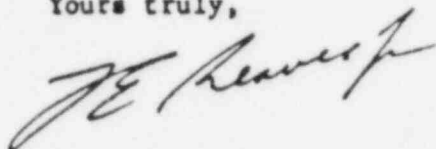
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Member Middle South Utilities System

Please note this letter in draft form was transmitted to your Messrs. Gilray and Benedict. They concurred with this wording prior to this formal submittal. We appreciate the cooperation and assistance provided by you and members of your staff in this matter.

Yours truly,



T. E. Reaves, Jr.
Manager of Quality Assurance

WEE:dl

cc: Mr. R. B. McGehee
Mr. T. B. Conner
Mr. N. L. Stampley
Mr. A. G. Wagner
Mr. J. Gilray
Mr. B. Benedict
OQAM Rev. 3 File
OQAM Holders
Manual File
File



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

June 1, 1982

NUCLEAR PRODUCTION DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

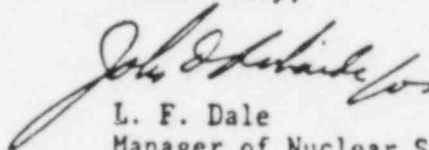
SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0260/15180/L-860.0
Technical Specifications
AECM-82/244

The purpose of this letter is to formally transmit proposed changes to Grand Gulf Nuclear Station Unit 1 Technical Specifications.

These proposed changes are included as an attachment to this letter in the form of current "Proof and Review" pages with the proposed changes identified.

Please advise if additional information is required.

Yours truly,



L. F. Dale
Manager of Nuclear Services

WWK/SHH/JDR:lm
Attachments

cc: Mr. N. L. Stampley (w/o)
Mr. G. B. Taylor (w/o)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

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Member Middle South Utilities System



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

June 9, 1982

NUCLEAR PRODUCTION DEPARTMENT

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
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0260/15180/L-860.0
Technical Specifications
AECM-82/255

The purpose of this letter is to formally transmit proposed changes to Grand Gulf Nuclear Station Unit 1 Technical Specifications.

These proposed changes are included as an attachment to this letter in the form of current "Proof and Review" pages with the proposed changes identified.

Please advise if additional information is required.

Yours truly,

L. F. Dale
Manager of Nuclear Services

WWK/SHH/JDR:lm
Attachments

cc: Mr. N. L. Stampley (w/o)
Mr. G. B. Taylor (w/o)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

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MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1840, JACKSON, MISSISSIPPI 39205

June 9, 1982

NUCLEAR PRODUCTION DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director,

Dear Mr. Denton:

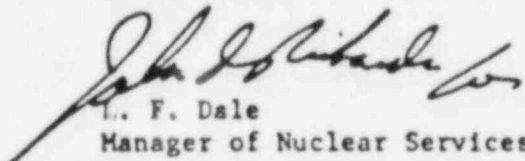
SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
File 0260/0651/15180/L-860.0
Phased Preoperational and Startup
Testing Plan
Reference: AECM-82/55
AECM-82/247

The referenced letter (attached) transmitted a description of Mississippi Power & Light Company's revised phased preoperational and startup testing program and the necessary Technical Specification waivers for Phase I operations which consist of low power testing and non-nuclear heatup.

The purpose of this letter is to transmit further Technical Specification waivers that are required for Phase I operations only. Due to the fact that there will be no significant decay heat or buildup of fission product inventory in the core during Phase I and that the reactor will be maintained subcritical with an adequate margin of negative reactivity during non-nuclear heatup, these waivers will create no hazard to the public health or safety.

Please advise if additional information is required.

Yours truly,


L. F. Dale
Manager of Nuclear Services

JPH:lg
Attachment

cc: (See Next Page)

Boo!

MISSISSIPPI POWER & LIGHT COMPANY

AECH-82/247
Page 2

cc: Mr. N. L. Stampley
Mr. R. B. McGehee
Mr. T. B. Conner
Mr. G. B. Taylor

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303

Attachment to AECM-82/247

Technical Specifications Waivers
Required for Phase I Operations

I. Testing/Plant Conditions during Phase I

- A. Fuel Loading
- B. Shutdown Margin Demonstrations
- C. Low Power Physics Testing
- D. Non-Nuclear Heatup

II. Technical Specification Exceptions/Clarifications

- A. For the non-nuclear heatup during Phase I testing, we request exemption from the Technical Specification requirements to have Primary Containment (Drywell & Containment) operable, and all associated Technical Specifications.
- B. Special test exception 3/4 10.3 - Shutdown Margin Demonstration.

We interpret this to allow shutdown margin demonstrations while applying Tech. Specs. required under Condition 5 (refueling). Thus we will perform shutdown margin checks under the restrictions imposed under Condition 5.

- C. It is our interpretation that testing requirements are also waived for any specifications for which an exception is taken.
- D. 3.11.3 Solid Radwaste System

The handling portion of solid radwaste shall be operable, however, a waiver is requested from the requirement to have the remainder of the solid radwaste system operable until Phase II.

- E. 3.11.1.3 Liquid Radwaste

A waiver is requested to this specification. Any radioactive waste which must be contained will be contained in suitable containers.

- F. Special test exception 3/4 10.1 - Lower Power Physics Testing

When operating under the provisions of this exception, we request that the requirements for Operational Condition 5 be applied for technical specifications compliance.

- G. Table 1.2, Operational Condition

During non-nuclear heatup only that footnote *** be waived to allow that the reactor mode switch may be placed in the Refuel position while performing single rod scram time and friction testing provided that the one-rod-out interlock is operable.

H. Additional waivers required while in Operational Condition 5

1. Table 3.3.2-1 - Primary Containment Isolation Part 1 of the table and associated spec require isolation instrumentation. A waiver is requested since that Primary Containment is not required, thus the instrumentation also should not be required.

2. 3.9.11.2
3.4.9.2 RHR Operability/Operating
3.9.11.1

A waiver is requested for these specifications since there is no decay heat which would require residual heat removal. The system will be operational, however, we do not necessarily wish to have the pumps operating.

3. 3.9.12 Horizontal Transfer Tube
A waiver is requested for this specification since no irradiated fuel will be handled and all fuel movement will be done under dry conditions.
4. 3.11.2.5 Normal Ventilation Exhaust Treatment
During Phase 1, with no fission product inventory, the projected cumulative dose should not exceed .3MR during any 31 day period, thus the normal ventilation exhaust treatment systems need not be operable.

5. 3.3.7.12 Gaseous Effluent Monitoring
A waiver is requested for part 4 of this specification since there will be no potential for radioactive gaseous effluents in the turbine building during Phase 1 testing.

- I. 3.5.2 ECCS -- Shutdown

A waiver is requested to the requirement for the required subsystem/systems listed in this specification to be operable. The fact that fuel in the core during Phase I is unirradiated means that the ECCS safety function is not needed to protect public health and safety.



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1840, JACKSON, MISSISSIPPI 39205

June 10, 1982

NUCLEAR PRODUCTION DEPARTMENT

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
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 0272/M-632.0/M-222.0
Transmittal of Proposed
Technical Specification Change,
Post-LOCA Vacuum Relief and
Drywell Purge
Vacuum Breaker Position
Indication
AECM-82/186

This letter transmits a proposed revision to the GGNS Technical Specifications pertaining to the drywell post-LOCA vacuum breakers and supporting justification. Associated with this issue are certain instrumentation changes for the check valves in the post-LOCA vacuum relief and drywell purge systems.

Both the post-LOCA vacuum relief and the drywell purge systems consist of a motor operated butterfly type isolation valve in series with the vacuum breaker check valve(s) which provides drywell vacuum relief. Both the vacuum breakers and isolation valves were provided with position indication. (See GGNS FSAR Figure 6.2-81).

During onsite testing of the vacuum breakers (check valves F001A,B, F002A,B, and F004A,B in FSAR Figure 6.2-81) to assure actuation on 1.0 psid pressure, several factors caused sufficient resistance to prevent the proper opening and closing of the valves. The valves were reworked and modified to operate within their design requirements, however, the lever arms when contacting the position switches did not allow the valves to fully close. Therefore, the position switches and lever arms were subsequently removed from the check valves.

The motor operated isolation valves which are in series with the check valves, operate by the same 1.0 psid pressure and are provided with position indication. Based on this, Mississippi Power & Light (MP&L) contends that position indication on the check valve vacuum breakers is not required.

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A proposed revision to Section 3/4.6.5, "Drywell Post-LOCA Vacuum Breakers," of the GGNS Technical Specifications is attached. The Limiting Condition for Operation and Surveillance Requirements are revised to indicate the use of position indication on the isolation valves instead of the vacuum breakers. The Technical Specifications on the Drywell Purge System are presently correct and no revision is required.

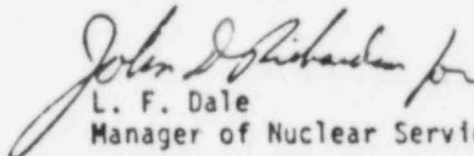
In addition, two other corrections are provided in Technical Specification Section 4.6.5, which indicate a revision to the surveillance requirements based on the GGNS post-LOCA vacuum breaker design.

Subsection 6.2.5.5 of the GGNS FSAR was revised in Amendment 55 to show position indication only on the isolation valves in the post-LOCA and drywell purge systems. FSAR Figure 6.2-81 will be revised in a future amendment to delete position indication on the check valves discussed above.

Notwithstanding the above, MP&L intends to provide position indication with qualified non-contact type switches on the vacuum breakers as an operator aid. Switches for this application, qualified to NUREG-0588, are currently not available but are expected to be provided during the first regularly scheduled refueling outage. This modification is being proposed as an operator convenience and is not considered a licensing requirement.

Please advise if any additional information is required.

Yours truly,


L. F. Dale
Manager of Nuclear Services

SAB/JGC/JDR:lm
Attachment

cc: Mr. N. L. Stampley (w/a)
Mr. G. B. Taylor (w/a)
Mr. R. B. McGehee (w/a)
Mr. T. B. Conner (w/a)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/a)
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 3100
Atlanta, Georgia 30303



Nuclear Information and Resource Service

1345 Connecticut Avenue NW, 4th Floor, Washington, D.C. 20036 (202) 296-7552

August 6, 1984

James M. Felton, Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-84-665

Rec'd 8-10-84

FREEDOM OF INFORMATION ACT REQUEST

Dear Mr. Felton:

Pursuant to the Freedom of Information Act, 5 U.S.C. 522, as amended, the Nuclear Information and Resource Service requests the following documents regarding the Grand Gulf nuclear plant. Please consider "documents" to include reports, studies, test results, correspondence, memoranda, meeting notes, meeting minutes, working papers, graphs, charts, diagrams, notes and summaries of conversations and interviews, computer records, and any other forms of written communication, including internal NRC Staff memoranda. The documents are specifically requested from, but not limited to, the Office of Inspection and Enforcement (I&E); Office of the Executive Legal Director (OELD); and Office of Nuclear Reactor Regulation (NRR).

Pursuant to this request, please provide all documents prepared or utilized by, in the possession of, or routed through the NRC related to:

1. The receipt, analysis (legal and technical) and denial of one or more "Show Cause" petitions filed by Cynthia Stewart on behalf of Jacksonians for Livable Energy Policies (JULEP) requesting action on the Grand Gulf plant.

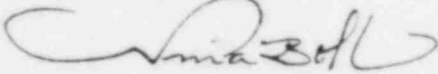
In our opinion, it is appropriate in this case for you to waive copying and search charges, pursuant to 5 U.S.C. 552(a)(4)(A) "because furnishing the information can be considered as primarily benefiting the general public." The Nuclear Information and Resource Service is a non-profit organization serving local organizations concerned about

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- 2 -

nuclear power and providing information to the general public. Information required by 10 CFR 9.14a was provided by letter dated August 3, 1984.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nina Bell".

Nina Bell
Assistant Director

cc: File



Nuclear Information and Resource Service

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- 2 -

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Nina Bell
Assistant Director

cc: File