

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

LICENSE NO. NPF-29

DOCKET NO. 50-416

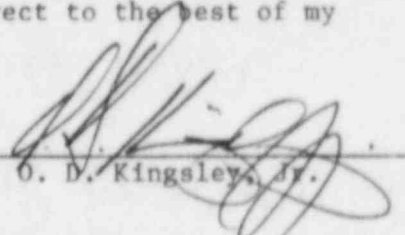
IN THE MATTER OF  
MISSISSIPPI POWER & LIGHT COMPANY  
and  
MIDDLE SOUTH ENERGY, INC.  
and  
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

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.

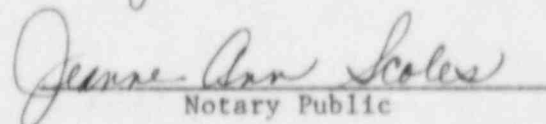
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STATE OF MISSISSIPPI  
COUNTY OF HINDS

  
O. D. Kingsley, Jr.

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 30th day of August, 1985.

(SEAL)

  
Notary Public

My commission expires:

SUBJECT: NLS-85/09  
Technical Specification 6.4.1, page 6-6

DISCUSSION: It is proposed to add a "#" footnote to the March 28, 1980 NRC letter reference in Technical Specification 6.4.1. This proposed "#" footnote will read as follows:

# Except that the experience and other training information provided in a letter to the NRC dated July 29, 1985 are acceptable for the individuals listed in that letter.

JUSTIFICATION: Present Technical Specification 6.4.1 endorses Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter concerning qualifications of reactor operators. Section A states that "Applicants for senior reactor operator license shall have 4 years of responsible power plant experience. Responsible power plant experience should be that obtained as a control room operator (fossil or nuclear)". For plants like Grand Gulf, these regulations do not adequately consider the situation where a plant has not held an operating license for 4 years so that operators can obtain this required experience. Grand Gulf Unit 1 was issued an operating license in June 1982 and a full power operating license in August 1984.

Section A of the March 28, 1980 NRC letter allows exceptions to experience requirements for precritical applicants to accommodate the fact that their facility has not yet been in operation. The proposed technical specification change is similar to this exception in that Grand Gulf has not been in operation long enough for its operators to obtain four years of control room experience.

MP&L is requesting this technical specification exception for two individuals whose experience and training is provided in a letter dated July 29, 1985 from Mr. L. F. Dale to Dr. J. Nelson Grace. These two candidates were selected as senior reactor operator candidates because of their proven performance working as licensed control room operators. They have demonstrated strong supervisory abilities as they have directed activities of non-licensed personnel. These two individuals have been determined to be qualified to fill a supervisory role in the Grand Gulf Operations Department and if licensed will be promoted to Shift Supervisors to allow staffing for a six shift rotation.

SIGNIFICANT HAZARDS CONSIDERATIONS:

There is a need at Grand Gulf to upgrade certain reactor operators to senior reactor operators in order to meet and maintain shift manning requirements, move into a six-shift rotation, and provide for attrition. Staffing projections and plans are predicated on the ability to upgrade reactor operators to senior reactor operators. The proposed exception for these two individuals is based on their licensed operator experience on Grand Gulf, their completion of an extensive training program, and their demonstrated supervisory skills.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the two individuals seeking the technical specification exception are highly trained on Grand Gulf and each has held a reactor operator license on Grand Gulf for more than two years.

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed exception will apply to individuals that are experienced licensed operators on Grand Gulf and who have demonstrated supervisory skills in directing the work of other operators.

The proposed change does not involve a significant reduction in a margin of safety because the two individuals involved have extensive experience on Grand Gulf as licensed and unlicensed operators.

Therefore, the proposed change involves no significant hazards considerations.