



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

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December 23, 1985

NUCLEAR LICENSING & SAFETY 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  
License No. NPF-29  
TDI Owners Group Design Review  
and Quality Reevaluation (DR/QR)  
AECM-85/0414

References: (1) MAEC-85/0216, dated July 5, 1985  
(2) AECM-85/0301, dated October 1, 1985  
(3) MAEC-85/0395, dated November 22, 1985

On May 31, 1985, Mississippi Power & Light Company (MP&L) met with members of your staff to discuss and review the status of Grand Gulf's (GGNS) implementation of recommendations from the TDI Owners Group Design Review and Quality Revalidation (DR/QR) report for GGNS. The results of that meeting were documented in a letter from you on July 5, 1985 (Reference 1).

GGNS Operating License (NPF-29) Condition 2.C.25(b) requires that MP&L submit its evaluation and actions on the DR/QR recommendations for NRC review and approval prior to restart from the first refueling outage (RF01). During the May 31, 1985, meeting MP&L reiterated its commitment (which had been previously discussed and agreed to with your staff by telephone) to submit this report by September 30, 1985. On October 1, 1985, MP&L submitted its response to the DR/QR which included a position on implementation of each recommendation and justification for exceptions taken (Reference 2). In addition this submittal provided information on other aspects of MP&L's TDI diesel generator maintenance, testing and surveillance program including training and trending of important parameters.

MP&L was expecting an NRC review and decision on its October 1, 1985, submittal in accordance with License Condition 2.C.25(b) on a schedule which would allow MP&L sufficient lead time to plan and schedule its RF01 diesel inspection and maintenance activities. However, on November 22, 1985, the NRC Staff wrote MP&L and stated it was discussing with the TDI Owners Group the means by which members of the group could modify recommendations in the plant specific DR/QR reports (Reference 3). Further, MP&L was advised that it must implement the GGNS DR/QR report without exception in the interim until this matter is resolved through the Owners Group.

ADD: BWR - L/BC's TECH SUPPORT

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MP&L has determined that some of the DR/QR report recommendations are unnecessary to assure reliability of the diesel generators and has appropriately taken and justified exceptions to them. MP&L believes that to fully implement the DR/QR recommendations prior to restart from RF01 would be overly conservative and would serve no useful purpose.

Implementation of the full DR/QR recommendations prior to restart from RF01 would place an undue burden on MP&L's RF01 complexity and duration. Alternatively, resolving DR/QR exceptions through the TDI Owners Group prior to NRC review may substantially extend the review process and seriously jeopardize MP&L's ability to adequately plan and schedule for RF01 diesel activities.

MP&L believes that License Condition 2.C.25(b) places an obligation upon both MP&L and the NRC to act in a timely manner to satisfy the license condition, while still ensuring that reasonable and prudent provisions are implemented to assure the reliability of the GGNS TDI diesel generators. MP&L fulfilled its portion of the license condition with the completion and submittal on October 1, 1985, of its response to the GGNS DR/QR recommendations. However, in an effort to resolve this matter MP&L will continue to work with the Owners Group to obtain an agreed upon list of acceptable exceptions for presentation to and review by the NRC in a timely manner. If it appears that this method of review will not be supportive of MP&L's schedule for RF01 planning, then MP&L will notify your office and request other means by which License Condition 2.C.25(b) can ultimately be fulfilled.

If you have any questions or comments, please call us.

Yours truly,



L. F. Dale  
Director

GCS/MLC/JGC:lm

cc: Mr. O. D. Kingsley, Jr.  
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