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William A. Eaton
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Grand Gulf Nuclear Station

February 4, 2000

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29
Response to Apparent Violations
In Inspection Report No. 50-416/99-19
Dated January 7, 2000 (GNRI-2000/00001)

GNRO-2000/00002

Gentlemen:

Entergy Operations, Inc. hereby submits responses to the apparent violations described in NRC Special Inspection Report 50-416/99-19 as requested in the NRC's letter dated January 7, 2000. The inspection report requested that Grand Gulf Nuclear Station respond in writing under oath or affirmation to the apparent violations within 30 days from the date of the letter. Based on an understanding of previous discussions with the staff concerning these violations, our corrective actions are adequate and only require docketing. The enclosed responses present:

- (1) the reason for the apparent violation,
- (2) the corrective steps that have been taken and the results achieved,
- (3) the corrective steps that will be taken to avoid further violations and
- (4) the date when full compliance will be achieved for each of the apparent violations.

In keeping with a policy of open communications, Grand Gulf Nuclear Station is taking this opportunity to discuss a comment made in the special inspection report by the NRC. Specifically, we were concerned with your characterization of the Significant Event Response Team (SERT) Root Cause report as failing to be "self-critical or thorough". We understand that the inspector had two areas that were not specifically addressed by the SERT team as failed barriers. We believe it was recognized that these two barriers were not related to the root and contributing causes, and that their exclusion from the SERT report is a matter of differing opinions. The SERT team, as noted in the NRC inspection report, had issued a corrective action to address one of these issues. The SERT team did not believe the problem with the information tag was a barrier to this event. The disagreement over the method used to document the issue does not appear to us to be a failure to be self-critical or thorough.

IEO

The second issue, failure to document the change in the work package impact statement, was discussed by the SERT although not documented in the report. We agree that we failed to document this issue until questioned by the inspector. We do not agree that it represented a failed barrier. We understand the inspector's view that every chance we have to question a decision may be an opportunity to prevent a failure. However, the extensive investigation performed by the SERT identified no basis to conclude that failure to document the change to the impact statement would have prevented this event.

Based on the review of the SERT work by a Corrective Action Review Board, we believe we were self-critical and thorough.

As requested, the Affirmation is included as Attachment V.

Yours truly,



WEA/war/cdh

attachments:

- I) Response to Apparent Violation 50-416/9919-01
- II) Response to Apparent Violation 50-416/9919-02
- III) Response to Apparent Violation 50-416/9919-03
- IV) Response to Apparent Violation 50-416/9919-04
- V) Affirmation

cc: Ms. J. L. Dixon-Herrity, GGNS Senior Resident (w/a)
Mr. D. E. Levanway (Wise Carter) (w/o)
Mr. L. J. Smith (Wise Carter) (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)

Mr. E. W. Merschoff (w/a)
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Response to Apparent Violation 50-416/99-19-01

The failure to maintain the Division III Diesel Generator operable consistent with Technical Specification requirements from July 9 to September 21, 1999, is an apparent violation of Technical Specification 3.8.1.b.

Reason for the apparent violation:

We concur with the following root causes already noted in the inspection report:

1. the failure of the system engineer to document questions about the appropriate oil levels and concerns about foaming/aeration in the corrective action program and
2. the system engineer not considering a change in oil level as a configuration change.

Corrective steps that have been taken and the results achieved:

1. The proper oil level has been identified for the Division III Diesel Generator.
2. The quantities referenced on the nameplate have been stamped out to remove oil volume information from the nameplate of the installed Division III Diesel Generator.
3. Condition Report CR-GGN-1999-1083 was initiated to address the generic issue of configuration control practices. A configuration control evaluation has been performed. The results of the evaluation is part of the root cause analysis for this CR.
4. The configuration control team composed of both onsite and offsite personnel performed an assessment of our configuration control practices. As a result of the assessment, several less-than-adequate practices were identified and each was documented with separate condition reports.
5. All hands meetings with the engineering department personnel were held to discuss the lessons learned from the Division III Diesel Generator bearing failure and to discuss the expectations for any future situations. An Engineering Administrative Directive was developed and issued to all engineering personnel that outlines expectations for proceeding with work in face of uncertainty.

Corrective steps that will be taken to avoid further violations:

1. Programmatic controls over oil levels and volumes will be established.
2. The information on these controls will be provided to the appropriate Training Review Groups for consideration for incorporation into training.

Date when full compliance will be achieved:

Implementation of corrective steps will be controlled through the corrective action program. Completion dates for corrective actions associated with Condition Report CR-GGN-1999-1083 will be established after Corrective Action Review Board review and approval. Other corrective actions are scheduled for completion by August 31, 2000.

Response to Apparent Violation 50-416/99-19-02

The failure to address the bearing temperatures as a potential cause for the alarm (Generator RTD Temp HI) is an example of an inadequate procedure to address alarm conditions and is an apparent violation of Technical Specification 5.4.1

Reason for the apparent violation:

We concur with the following root cause already noted in the inspection report:

1. The Significant Event Response Team (SERT) identified that the alarm response instruction did not provide guidance to the operators for increased temperature in the generator bearings.

Corrective steps that have been taken and the results achieved:

1. The alarm response instruction has been revised to add the bearing temperature and an action to trip the diesel if the alarm comes in due to high bearing temperature.

Corrective steps that will be taken to avoid further violations:

1. The licensee plans to conduct a 10 percent review of alarm response instructions that involve alarm panels supplied with plant equipment and correct the instructions as required. The licensee will increase the scope of the review as required.

Date when full compliance will be achieved:

Implementation of corrective steps will be controlled through the corrective action program. All corrective actions associated with this event are scheduled for completion by August 31, 2000.

Response to Apparent Violation 50-416/99-19-03

The maintenance planner failed to comply with Procedure 01-S-18-4, 'Planning Guideline'. The maintenance planner also failed to adequately question the work package revision. Additionally, the information tag hung on the Division III Diesel Generator was used inappropriately by the operators. These were apparent violations of Technical Specification 5.4.1.

Reason for the apparent violation:

The following causes were noted in the inspection report. Grand Gulf Nuclear Station has not completed the root cause determination for the planning issue. Any additional actions as a result of the Root Cause will be handled under the corrective action process.

1. The maintenance planner failed to adequately plan a work package to add the required amount of oil to the Division III Diesel Generator.
2. The maintenance planner failed to adequately question the work package revision.
3. Operators used the information tag hung on the Division III Diesel Generator inappropriately.

Corrective steps that have been taken and the results achieved:

1. Management initiated Condition Report CR-GGN-1999-1889 to address the issue of the problems with the impact statement.

Corrective steps that will be taken to avoid further violations:

1. Review the practice of allowing unrelated work on two different components on the same skid to be completed in the same work package, review industry practices in this area and revise the maintenance planning procedures if necessary.
2. Provide training to the planning staff addressing management expectations that changes to work packages be challenged.
3. Revise procedure 01-S-06-1, 'Protective Tagging System', to more clearly describe how information tags are to be used.
4. A 100 percent audit of information tags in the field will be conducted to detect and clear any information tags which give directions, conflict with procedures or conflict with operator rounds.

Date when full compliance will be achieved:

Implementation of corrective steps will be controlled through the corrective action program. Completion dates for corrective actions associated with CR-GGN-1999- 1103 will be established after Corrective Action Review Board review and approval. Other corrective actions will be completed by August 31, 2000

Response to Apparent Violation 50-416/99-19-04

The failure to document the differences between the controlled drawing and the nameplate is identified as an example of an apparent violation of 10 CFR Part 50, Appendix B, Criterion V.

Reason for the apparent violation:

We concur with the following root cause already noted in the inspection report:

1. The system engineer exhibited insufficient awareness of the impact of actions on safety or reliability in that a vendor drawing was used to place acceptable bands on the generator oil level sightglasses and later recognized that the nameplate oil amount conflicted with the oil level specifications on the vendor drawing.

Corrective steps that have been taken and the results achieved:

1. The failure to document the conflicting information deficiency in a condition report and the failure to address the foaming/aeration and potential for bearing damage in a condition report were identified as root causes in the SERT report.
2. Guidance to utilize collaboration with peers and supervisors to determine the conservative action when faced with competing alternatives, e.g. conflicting design input, has been developed and issued as a GGNS Engineering Administrative Directive.
3. All hands meetings with the engineering department were conducted to discuss the lessons learned from the Division III Diesel Generator bearing failure and to discuss expectations for any future situation.
4. The oil sampling task frequency for the Division III Diesel Generator has been evaluated.
5. Engineering has evaluated the oil foaming/aeration in the Division III generator bearing sight glasses.

Corrective steps that will be taken to avoid further violations:

1. The root cause report will be forwarded to the Training Review Group for additional training for engineering, operations, and maintenance personnel.
2. The lessons learned from the event are to be covered in a site all-hands meeting.
3. Establish engineering guidance for reporting and evaluating oil foaming/aeration in the oil analysis program, using oil analysis to predict bearing failures, and establishing how to document anomalies identified in the field.

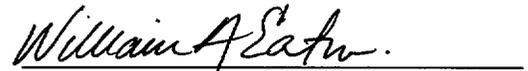
Date when full compliance will be achieved:

Implementation of corrective steps will be controlled through the corrective action program. All corrective actions associated with this event are scheduled for completion by August 31, 2000.

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION
LICENSE NO. NPF-29
DOCKET NO. 50-416
IN THE MATTER OF
ENERGY MISSISSIPPI, INC.
and
SYSTEM ENERGY RESOURCES, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION
and
ENERGY OPERATIONS, INC.

AFFIRMATION

I, W. A. Eaton, being duly sworn, state that I am Vice President, Operations GGNS of Entergy Operations, Inc.; that on behalf of Entergy Operations, Inc., System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by Entergy Operations, Inc. to sign and file with the Nuclear Regulatory Commission, this response to notice of violation; that I signed this response to notice of violation as Vice President, Operations GGNS of Entergy Operations, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.


W. A. Eaton

STATE OF MISSISSIPPI
COUNTY OF CLAIBORNE

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this
4th day of February 2000.


Notary Public



My commission expires:

NOTARY PUBLIC STATE OF MISSISSIPPI AT LARGE
MY COMMISSION EXPIRES: May 4, 2003
BONDED THRU NOTARY PUBLIC UNDERWRITERS