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May 28, 2002

U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attention: Document Control Desk

Subject: Voluntary LER –2002-001-00 [Follow-up to the NOED Granted to Extend the LCO for Div 2 DG]

Grand Gulf Nuclear Station Docket No. 50-416 License No. NPF-29

GNRO-2002/00046

Ladies & Gentlemen:

Attached is Licensee Event Report (LER) 2002-001-00 which is a voluntary report. This letter does not contain any commitments.

Yours truly,

William A Satu

WAE/RRJ/rrj attachments: 1. LICENSEE-IDENTIFIED COMMITMENTS

2. LER 2002-001-00

cc: (See Next Page)

GNRO-2002/00046

CC:

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

Mr. E. W. Merschoff (w/2)	ALL LETTERS
Regional Administrator	
U.S. Nuclear Regulatory Commission	
Region IV	
611 Ryan Plaza Drive,	
Suite 400 Arlington, TX 76011	
U.S. Nuclear Regulatory Commission	ALL LETTERS – U.S. POSTAL
ATTN: Mr. S. P. Sekerak, NRR/DLPM (w/2)	SERVICE MAIL DELIVERY
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Washington, D.C. 20555-0001	

ATTACHMENT 1 TO GNRO-2002/00046 LICENSEE-IDENTIFIED COMMITMENTS

Letter #:	GNRO-2002/00046			
			TYPE	SCHEDULED
		(Che	ck only one type)	
		ONE-	CONTINUING	COMPLETION
	COMMITMENT	TIME	COMPLIANCE	DATE
		ACTION		(If Required)
	NONE			

NRC FORM 366 U.S. NUCLEAR REGULATORY								APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004						
(See reverse for required number of digits/characters for each block)						Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bis1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.								
1. FACILITY N	IAME						2. DO	CKET NUM	MBER		3. P	AGE		
Grand	Gulf Nu	clear S	tation,	Unit 1				050	000 416				1 OF	4
4. TITLE												*******		
Follow-u	ip to I	Divisi	on 2	DG Notic	e of	Enf	orcen	nent Di	scretion					
5. EVE	ENT DATE	_	6.	LER NUMBER	ર	7.	REPORT	T DATE	8,	OTHER P	ACIL	ITIES	INVOLVE	ED
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9. OPERA	TING	4	11.	THIS REPOR	et js s	UBMI	TTED PL	IRSUANT	TO THE REQUIR	REMENTS		IO CEF	₹§: (Chec'	k all that apply)
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			20.2	(203(a)(2)(1))		50.73	(a)(2)(i)(i)	A) D)	50.73(a)(2)(V)(D)				
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16. ABSTRACT	(Limit to 1	400 space	s, i.e., ap	proximately 15 s	inale-s	paced ty	pewritten	lines)						
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This is a vo	luntarv	LER to	o provia	de a follow	v-up	to the	e Notic	ce of Fr	nforcement [Discretio	on (l	NOF	D) rece	aived by
Grand Gulf	Nuclea	r Statio	on on M	March 29	2002	7 Th	e NOI	ED exte	nded the lin	nitina co	ondi	tion f	for one	ration
(1 CO) time	by 72 h	ours to	allow	for repair	and	testi	ng of t	he dies	el generator			ae a	result (of the
iacket wate	r temne	rature	switch	failures	Cho I		ng or i Dwae	invoko	d at 0402 on	March	ng att	i to a	void o	
a Technical	Snacifi	cation	(TS) n	auired ch	utdo		Althou	invoked		usod to	20	10 a		
	Specin mont of	anlan	t shute	town the	Divid	vvn. vion 2		ugn the	NOED was	useu it	avo	Jiu u Lin ti	ne motor	orooludo o
commencer		a pian	t Shutt	iown, the	DIVIS		DG w	vas rest	ored to oper	able st	atus	, in u	me to p	preciude a
reportable of	conditio	n.												
I ne Divisioi	n 2 DG	was de	eclared	i inoperab	le or	n Mar	ch 26,	, 2002 a	at 0402 for p	lanned	mai	inten	ance.	During the
planned ma	untenar	ice, va	rious p	problems c	occui	rred s	such a	s infant	mortality fai	lure of	som	ie of	the pro	ocess
sensors that	t cause	d the [DG to I	remain ino	pera	ble.	Along	with th	e infant mor	tality sv	vitch	ı failı	ure, the	3
equipment	tagging	and re	e-taggi	ng issues	and	the li	mited	conting	ency plannir	ng resu	lted	in a	planne	ed outage
time of 46 h	nours e>	ctendin	g into	excess of	the	72-ho	our allo	owed L	CO.					

A root cause determination was performed with the resultant root cause identified as job performance standards not adequately defined. Condition Report, CR-GGN-2002-00555 was written to address exceeding the 72-hour LCO and will address the corrective actions to prevent recurrence of this type event.

U.S. NUCLEAR REGULATORY U.S. NUCLEAR REGULATORY (1-2001)										
FACILITY NAME (1)	FACILITY NAME (1) DOCKET (2) LER NUMBER (6)									
Grand Culf Nuclear Station	05000	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	0					
	05000	2002	001	00	2	OF	4			
NARRATIVE (If more space is required, use addit	ional copies of NRC Form 366A)	(17)								

A. REPORTABLE OCCURRENCE

None. This LER is voluntary to provide the NRC follow-up information to the NOED granted to extend the LCO time for the Division 2 Diesel Generator (DG) [EK].

B. INITIAL CONDITIONS

At the time of the event, the reactor was in OPERATIONAL CONDITION 1 with reactor power at approximately 100 percent. Reactor temperature, reactor pressure vessel (RPV) pressure and RPV water level were at approximately 540 degrees F, 1012 PSIG and 36 inches, respectively. Planned maintenance was being performed on the Division 2 DG.

C. DESCRIPTION OF OCCURRENCE

The Division 2 DG was declared inoperable on March 26, 2002 at 0402 for planned maintenance. During the planned maintenance, various problems occurred such as infant mortality failures of some process sensors that caused the DG to remain inoperable. The total sum of the infant mortality switch failure, equipment tagging and re-tagging issues, and limited contingency planning resulted in a planned outage time of 46 hours extending into excess of the 72 hour allowed outage limiting condition for operation (LCO).

Several conversations took place between the licensee and the NRC on March 28th and preparations were made for Grand Gulf to request a Notice of Enforcement Discretion (NOED) to extend the LCO time by 72 hours to allow for repair and testing of the diesel generator as a result of the jacket water temperature switch failures. The NOED was granted by the NRC at 0030 on March 29th and was invoked at 0402 on March 29th. The NOED was utilized to prevent commencement of a TS-required shutdown. The Division 2 DG was declared operable at 1336 on March 29th.

While this event is not reportable, a voluntary LER is being written to provide the NRC additional followup information. According to NRC Regulatory Issue Summary 2001-20, even if a NOED is issued to a licensee, if an LER is required by 10CFR50.73 as a result of a non-conformance, then the LER must be submitted. In GGNS' situation, the NOED was granted, but the DIV 2 DG was restored to operable status in time to prevent a reportable condition under 10CFR50.73.

According to 10CFR50.73(a)(2)(i)(A), "The completion of any nuclear plant shutdown required by the plant's Technical Specifications;" requires an LER if the shutdown is completed. While the NOED granted a 72-hour extension to the LCO, we considered reportability under 10CFR50.73(a)(2)(i)(A) as if we had not received the NOED. NUREG 1022 states, "For 50.73 reporting purposes, the phrase 'completion of any nuclear plant shutdown' is defined as the point in time during a TS required shutdown when the plant enters the first shutdown condition required by an LCO. An LER is not required if a failure was or could have been corrected before a plant has completed shutdown and no other criteria in 50.73 apply."

NRC FORM 366A (1-2001)	U.S. NUCLEAR REGULATORY COMMISSION										
FACILITY NAME (1)	DOCKET (2)		LER NUMBER (6)			PAGE (3)				
Grand Culf Nuclear Station	05000	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	0	05	A				
	05000	2002	001	00	3	UF	4				
NARRATIVE (If more space is required, use add	itional copies of NRC Form 366A)	(17)									

In this situation the DIV 2 DG was functional at 0700 hours and was declared operable at 1336 (about 2 1/2 hours before having to reach plant shutdown). Therefore, we believe the plant, even without the NOED, would not have been required to complete shutdown before the problem was corrected and the DG returned to operable status.

D. APPARENT CAUSE

A Root Cause Determination was performed to determine the contributing factors for exceeding the 72-hour TS Limit. The root cause was determined to be inadequately defined job performance standards. Some examples of this were:

- No guidelines exist to define the content and major points to be considered during pre-system outage meetings. Limited contingency planning was involved in the pre-outage meetings for the DG outage. Guidelines would ensure key areas were addressed instead of relying on 'Tribal Knowledge'.
- Tagging and re-tagging of equipment consumed hours that were critical to meeting the 72-hour LCO time limit. The emergent tagging activities were performed in conjunction with on-going daily plant activities. (No one was dedicated to the diesel tagging activities.)
- The information concerning the reliability issue with the pneumatic temperature switch was known to a few key individuals, but not known by other key personnel involved in the outage. This affected the degree of contingency planning that was done.

E. CORRECTIVE ACTIONS

Immediate Action: The Division 2 Diesel Generator was repaired and returned to operable status.

Long Term Actions: A Condition Report, CR-GGN-2002-00555, was written to address exceeding the 72 hour TS Limit. A root cause determination was performed as one of the corrective actions of the CR. This root cause identified additional corrective actions that will address the enhancement of planning and scheduling of system outages.

NRC FORM 366A (1-2001)				U.S. NU	CLEAR REG	ULATO	RY COM	MISSION			
	LICENSEE EVENT RI	EPORT (L	.ER)								
FACILITY NAME (1) DOCKET (2) LER NUMBER (6)								PAGE (3)			
Grand Gulf Nuclear Station	05000	YEAR	SI	Equential Number	REVISION NUMBER	4	05	4			
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NARRATIVE (If more space is required, use addition	onal copies of NRC Form 366A)	(17)			•						

F. SAFETY ASSESSMENT

This is a voluntary LER to provide follow-up information related to the NOED granted to Grand Gulf on March 29, 2002. The DG inoperable status did not exist for longer than allowed by TS (72-hour LCO allowed outage time and the shutdown action statement of 12 hours); therefore, there was no safety significance to this event. In fact the granting of the NOED by the NRC avoided any additional risk associated with the forced reactor power reduction and power ascension that would have been required without the NOED.

G. ADDITIONAL INFORMATION

None