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GNRO-2008/00073

November 13, 2008

U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

Attention:

Document Control Desk

Subject:

Reply to Notice of Violation EA-98-295

Grand Gulf Nuclear Station, Unit 1

Docket No. 50-416 License No. NPF-29

Reference:

GNRI-2008/00092, NRC Integrated Inspection Report Dated

10/17/08

Dear Sir or Madam:

Entergy Operations, Inc. (EOI) hereby submits the Reply to Notice of Violation EA-08-295 for Grand Gulf Nuclear Station. This Notice of Violation was issued in NRC Inspection Report 05000416/2008004. The inspection was conducted during the period of June 22 through September 20, 2008. EOI concurs that the overall findings of the inspection are valid in that the specific example identified is indicative of failure to follow established station procedures.

Should you have any questions or require clarification of our response, please contact this office at 601-437-6219.

Yours truly.

MAK/JEO:jeo

M. A KRupa

attachment: Response to Notice of Violation; EA-08-295

cc: NRC Senior Resident Inspector

Grand Gulf Nuclear Station Port Gibson, MS 39150

U. S. Nuclear Regulatory Commission ATTN: Mr. Elmo E. Collins, Jr. (w/2) Regional Administrator, Region IV 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-4005

U.S. Nuclear Regulatory Commission

ATTN: Mr. Carl F. Lyon, NRR/ADRO/DORL (w/2)

ATTN: ADDRESSEE ONLY

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ATTACHMENT 1 RESPONSE TO NOTICE OF VIOLATION EA-08-295

GNRO-2008/00073

RESPONSE TO NOTICE OF VIOLATION

I. Cited Violation

During an NRC inspection conducted on June 22 through September 20, 2008, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," states in part, that activities affecting quality shall be accomplished in accordance with prescribed procedures.

Contrary to this requirement, from March 16 through July 9, 2008, the licensee failed to accomplish an activity affecting quality in accordance with prescribed procedures. Specifically, the licensee failed to perform an adequate inspection of probable maximum precipitation door seals protecting safety-related equipment as prescribed in Procedure 07-S-14-310, "Inspection of Mechanical Seals on Doors," revision 5.

This violation is associated with a Green SDP finding.

II. The Reason for the Violation

Entergy admits to the violation as described in the inspection report. Specifically, "the licensee failed to accomplish an activity affecting quality in accordance with prescribed procedures." This violation was the result of personnel failure to follow plant procedure 07-S-14-310, "Inspection of Mechanical Seals on Doors".

III. Corrective Steps Which Have Been Taken and Results Achieved

Appropriate actions were taken to address the inadequate performance of the inspection for the individual involved. Additionally, during a shop brief, expectations for properly following procedures, with particular emphasis on inspection of PMP door seals, was covered with all personnel who may perform this work.

Compensatory measures for deficient PMP door seals specified in plant procedure 07-S-14-310, "Inspection of Mechanical Seals on Doors," were implemented. Implementation of the compensatory actions brought GGNS back into procedural compliance on July 09, 2008.

As a result of this violation seal inspection frequency was evaluated and determined to be a possible contributing factor. To address this possible contributing factor the inspection frequency was changed from yearly to quarterly. This change was recently implemented and therefore sufficient data is not yet available to validate the acceptability of this change.

IV. Corrective Steps to be Taken to Preclude Further Violations

As stated previously, the inspection frequency was changed therefore going forward PMP door seals will be inspected on a quarterly basis rather than yearly.

V. <u>Date When Full Compliance Will be Achieved</u>

Entergy returned to full compliance with the procedure by reestablishing the compensatory actions on July 9, 2008.