



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

MAY 17 1985

Mississippi Power and Light Company  
ATTN: Mr. J. B. Richard  
Senior Vice President, Nuclear  
P. O. Box 23054  
Jackson, MS 39205

Gentlemen:

SUBJECT: NOTICE OF VIOLATION: EA 85-20  
(NRC INSPECTION REPORT NO. 50-416/84-54)

On December 6 - 17, 1984, the Nuclear Regulatory Commission (NRC) staff conducted a special inspection of activities authorized by NRC Operating License No. NPF-29 for Grand Gulf Unit 1. This inspection specifically concerned the failure of Grand Gulf Unit 1 to meet the over-current protection requirements for circuits that penetrate containment after an earlier Mississippi Power and Light Company (MP&L) review had indicated that the requirements were satisfied. The NRC, in a meeting with MP&L on December 17, 1984, reviewed the circumstances surrounding the identified violation and MP&L's proposed corrective actions. The violation is described below and in the enclosed Notice of Violation.

MP&L discovered a problem in August 1984, regarding the adequacy of over-current protection of electrical circuits penetrating containment at Grand Gulf Unit 1. In a letter dated September 10, 1984, MP&L reported the corrective action taken and stated that no additional discrepancies were found after conducting a complete review of all circuits penetrating the primary containment. Subsequently, while conducting an engineering design review of Unit 2 in late November and early December 1984, MP&L identified additional discrepancies applicable to Unit 1. These additional discrepancies revealed a lack of compliance regarding redundant over-current protection of containment penetrations as specified in Regulatory Guide (RG) 1.63 and as described in the Grand Gulf Final Safety Analysis Report (FSAR). In addition, MP&L found that 52 low voltage control circuit breakers for which credit was taken for penetration protection were not in the plant Technical Specifications.

The apparent cause of the late discovery of these discrepancies was the reliance of MP&L upon an engineering review that was not thorough. The August 1984 review was not an in-depth review in that it did not look at Category 6 and 7 circuits (low voltage instrumentation circuits) since these categories were believed to be inherently self-limiting and of such low power as to be of no concern. However, a number of circuits placed in Categories 6 and 7 had a significant power requirement and should not have been placed in these lesser categories. Consequently, the August 1984 review did not identify certain circuits in these categories for which over-current protection was deficient.

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The safety significance of the discrepancies was low. The circuits found to be deficient were relatively small diameter conductors (maximum of No. 12 AWG wire) and carried currents of low energy levels. Therefore, the penetrations were unlikely to fail in a manner that would result in exceeding Technical Specification limits.

The violation described in the enclosed Notice has been categorized as a Severity Level III violation in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984). Although civil penalties are usually proposed for Severity Level III violations, we have not proposed a penalty in this instance since the NRC issued a Notice of Violation and Proposed Imposition of Civil Penalties in the amount of \$125,000 to MP&L on March 21, 1985, for violations involving material false statements regarding Technical Specifications (EA 84-75) which should ensure that you devote the necessary attention to correct the problem of incomplete and inaccurate submittals to the NRC. We will closely follow your corrective actions to ensure that information provided to the NRC is complete, thorough, and accurate. We emphasize that similar violations in the future may result in additional enforcement action.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to take to prevent recurrence. After reviewing your response to this Notice of Violation, including your proposed corrective actions, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in NRC's Public Document Room.

The responses directed by this letter and its enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,

  
J. Nelson Grace  
Regional Administrator

Enclosures:

1. Notice of Violation
2. Inspection Report No. 50-416/84-54

cc w/encls: (see page 3)

NOTICE OF VIOLATION

Mississippi Power and Light Company  
Grand Gulf Nuclear Station, Unit 1

Docket No. 50-416  
License No. NPF-29  
EA 85-20

As a result of review of the licensee's submittal dated September 10, 1984, a material false statement was identified. The apparent cause of this violation was reliance by Mississippi Power and Light Company (MP&L) upon a previous engineering review that was not thorough. The review did not uncover the miscategorization of certain low power control circuits and the inadequate sizing of certain circuit breakers. The miscategorization resulted in an erroneous assumption that certain low power circuits were inherently self-limiting and were of such low power that they did not require over-current analysis. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984), the following violation was identified:

In a letter dated September 10, 1984, the licensee reported that circuit over-current protection discrepancies found in August 1984, had been corrected and stated, "MP&L conducted a complete review of all circuits penetrating the primary containment to ensure compliance with RG [Regulatory Guide] 1.63 and the FSAR [Final Safety Analysis Report] description of penetration protection. No additional discrepancies were found."

Contrary to Section 186 of the Atomic Energy Act of 1954, as amended, this statement was a material false statement. The statement was false because a complete review of all circuits penetrating primary containment had not been conducted in that no review was made of circuits that the licensee had categorized as categories 6 and 7. The statement was material because the NRC staff relied upon it in determining the adequacy of containment integrity with respect to containment penetrations.

This is a Severity Level III violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, Mississippi Power and Light Company is hereby required to submit to the Director, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region II, 101 Marietta Street, N.W., Suite 2900, Atlanta, GA 30323, within 30 days of the date of this Notice a written statement or explanation including for the alleged violation: (1) admission or denial of the alleged violation, (2) the reasons for the violation if admitted, (3) the corrective steps that have been taken and the results achieved, (4) the corrective steps that will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Date: MAY 17 1985

UNITED STATES NUCLEAR REGULATORY COMMISSION

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