



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-4511

March 20, 2013

Kevin Mulligan
Vice President Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

SUBJECT: ERRATA FOR GRAND GULF NUCLEAR STATION - NRC INTEGRATED
INSPECTION REPORT NUMBER 05000416/2012005

Dear Mr. Mulligan:

Please insert the enclosure to this letter as a replacement for pages 5, 16 and 17 of NRC Inspection Report 05000416/2012005. Additional information was provided to the inspectors that changed the facts associated with noncited violation 05000416/2012005-02 following issuance of the inspection report. This errata reflects that additional information. These additional facts resulted in no cross-cutting aspect being assigned for this finding.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Document Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

David Proulx, Acting Branch Chief
Project Branch C
Division of Reactor Projects

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

Enclosure: Errata for Inspection Report 05000416/2012005

cc w/ encl: Electronic Distribution for Grand Gulf Nuclear Station

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the design negative pressure of ¼ inch water column within 120 seconds. Using Inspection Manual Chapter 0609, Attachment 4, "Initial Characterization of Findings," the inspectors determined that the finding affected the Barrier Integrity Cornerstone. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at Power," the inspectors determined that the finding had very low safety significance (Green) because the finding only represents a degradation of the radiological barrier function provided for the auxiliary building and standby gas treatment system. The inspectors determined that the apparent cause of this finding was that the licensee had failed to classify the degraded water intrusion barrier as a condition adverse to quality that warranted correction in a timely manner. Therefore, the finding has a cross-cutting aspect in the problem identification and resolution area, corrective action program component because the licensee failed to properly classify conditions adverse to quality [P.1(c)](Section 1R12).

- Green. The inspectors identified a non-cited violation of 10 CFR 50.65(a)(2), for the failure to evaluate the condition of the auxiliary building water intrusion barrier. The licensee entered this issue into their corrective action program as Condition Report CR-GGN-2012-11740. Corrective actions included initiating Condition Report CR-GGN-2012-12286, in which the licensee concluded the degraded water intrusion barrier had experienced a Maintenance Rule Functional Failure and required further evaluation to determine if the barrier should be classified in 10 CFR 50.65 (a)(1).

The finding is more than minor because if left uncorrected, the failure to adequately evaluate the condition of the auxiliary building water intrusion barrier in accordance with the maintenance rule program could lead to a more significant safety concern. Specifically, continued inadequate evaluation of the water intrusion barrier could compromise the integrity of the secondary containment function of the auxiliary building. Using Inspection Manual Chapter 0609, Attachment 4, "Initial Characterization of Findings," the inspectors determined that the finding affected the Barrier Integrity Cornerstone. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at Power," the inspectors determined that the finding was of very low safety significance (Green) because the finding only represents a degradation of the radiological barrier function provided for the auxiliary building and standby gas treatment system. The inspectors determined that this finding is a latent issue; therefore no cross cutting aspect was assigned (Section 1R12).

with Section 2.3.2 of the Enforcement Policy because it was of very low safety significance (Green) and it was entered into the licensee's corrective action program as CR-GGN-2012-10314 to address recurrence: NCV 05000416/2012005-01, "Failure to Make Timely Corrective Actions to Repair the Degraded Auxiliary Building Water Intrusion Barrier."

(2) Failure to Adequately Monitor the Condition of the Auxiliary Building Water Intrusion Barrier

Introduction. The inspectors identified a Green non-cited violation of 10 CFR 50.65(a)(2), involving the failure to adequately evaluate the performance of the auxiliary building water intrusion barrier.

Description. On October 1, 2012, the inspectors reviewed Condition Report CR-GGN-2012-10323, which described water leaking into the auxiliary building following a heavy rain storm. During the review, the inspectors determined the auxiliary building roof system, which includes a water intrusion barrier, was scoped in the licensee's maintenance rule program with the monitoring goal of zero occurrences of water intrusion barrier degradation. The inspectors performed a detailed historical review of water intrusion into the auxiliary building and found 18 condition reports had been written between April 2004 and August 2012 identifying the occurrence of auxiliary building water intrusion barrier degradation as evidenced by water leaking into the auxiliary building. The inspectors reviewed previous work orders for structural and roof system inspections and determined the licensee was monitoring the water intrusion barrier as part of their structural inspection program and categorized the water intrusion barrier as "acceptable but degraded." Program plan GGNS-C-399.0, Rev. 9, states structures that are classified as "acceptable but degraded" will be reviewed to determine if the structure should be changed from category a(1) to category a(2). The inspectors determined that the water intrusion barrier had not been reviewed for determining whether it should be changed from category a(2) to category a(1).

When the inspectors brought their concern to the licensee's attention, they entered this issue in their corrective action program as Condition Report CR-GGN-2012-11740. Corrective actions included initiating Condition Report CR-GGN-2012-12286, in which the licensee concluded the degraded water intrusion barrier was a Maintenance Rule Functional Failure and required further evaluation to determine if the barrier should be classified a(1).

Analysis. The failure to review the condition of the auxiliary building water intrusion barrier to determine proper maintenance rule categorization is a performance deficiency. The inspectors used Inspection Manual Chapter 0612, Appendix B, to determine that the finding is more than minor because if left uncorrected, the failure to review the performance of the auxiliary building water intrusion barrier in accordance with the maintenance rule program could lead to a more significant safety concern. Specifically, continued inadequate evaluation of the degradation of the water intrusion barrier could compromise the integrity of the secondary containment function of the auxiliary building. Using Inspection Manual Chapter 0609, Attachment 4, "Initial Characterization of Findings," the inspectors determined that the finding affected the Barrier Integrity Cornerstone. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at Power," the inspectors

determined that the finding had a very low safety significance (Green) because the finding only represents a degradation of the radiological barrier function provided for the auxiliary building and standby gas treatment system. The inspectors determined that this finding is a latent issue; therefore no cross cutting aspect was assigned.

Enforcement. Title 10 CFR 50.65 (a)(1), requires, in part, that the holders of an operating license shall monitor the performance or condition of structures, systems, or components (SSCs) within the scope of the rule as defined by 10 CFR 50.65 (b), against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions.

Title 10 CFR 50.65 (a)(2) states, in part, that monitoring as specified in 10 CFR 50.65 (a)(1) is not required where it has been demonstrated that the performance or condition of an SSC is being effectively controlled through the performance of appropriate preventive maintenance, such that the SSC remains capable of performing its intended function.

Contrary to the above, before November 12, 2012, the licensee failed to demonstrate that the performance or condition of the auxiliary building water intrusion barrier had been effectively controlled through the performance of appropriate preventive maintenance and did not evaluate the barrier against licensee-established goals. Specifically, the licensee failed to consider placing the auxiliary building water intrusion barrier under 10CFR50.65(a)(1) for establishing goals and monitoring against the goals for each of the 18 occurrences of auxiliary building water intrusion barrier degradation that had been identified between April 2004 and August 2012. This violation is being treated as a non-cited violation (NCV), consistent with Section 2.3.2 of the Enforcement Policy because it was of very low safety significance (Green) and it was entered into the licensee's corrective action program as condition report CR-GGN-2012-11740 to address recurrence. (NCV 05000416/2012005-02, "Failure to Adequately Evaluate the Condition of the Auxiliary Building Water Intrusion Barrier")

1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13)

a. Inspection Scope

The inspectors reviewed licensee personnel's evaluation and management of plant risk for the maintenance and emergent work activities affecting risk-significant and safety-related equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- Week of October 28, 2012, during the division II allowed outage time, resulting in the site being in an increased yellow risk profile during the outage
- Week of November 19, 2012, during the unplanned down power to repair an oil leak on the B reactor feedwater pump, resulting in the site being in a increased risk profile