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Grand Gulf Nuclear Station
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GNRO-2016/00027

June 6, 2016

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Licensee Event Report LER 2016-003-00, Loss of Secondary Containment
Safety Function During Routine Roof Inspection
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

Dear Sir or Madam:

Attached is Licensee Event Report LER 2016-003-00, Loss of Secondary Containment Safety Function During Routine Roof Inspection. This report is being submitted in accordance with Title 10 Code of Federal Regulations 50.73(a)(2)(v)(C).

This letter contains no new commitments. If you have any questions or require additional information, please contact James Nadeau at 601-437-2103.

Sincerely,

A handwritten signature in black ink that reads "James Nadeau".

JJN/ram

Attachment: Licensee Event Report (LER) 2016-003-00

cc: see next page

U.S. Nuclear Regulatory Commission
ATTN: Mr. Jim Kim, NRR/DORL (w/2)
Mail Stop OWFN 8 B1
Rockville, MD 20852-2738

NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

U. S. Nuclear Regulatory Commission
ATTN: Marc L. Dapas (w/2)
Regional Administrator, Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Attachment To
GNRO-2016/00027
Licensee Event Report (LER) 2016-003-00



LICENSEE EVENT REPORT (LER)
(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@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 an 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 NAME Grand Gulf Nuclear Station, Unit 1	2. DOCKET NUMBER 05000 416	3. PAGE 1 OF 4
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4. TITLE
Loss of Secondary Containment Safety Function During Routine Roof Inspection

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	07	2016	2016 - 003 - 00			06	06	2016	N/A	05000 N/A
									N/A	05000 N/A

9. OPERATING MODE MODE 1	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)									
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)						
10. POWER LEVEL 100%	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)						
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)						
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)						
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)						
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)						
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)						
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER						
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A						

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME James Nadeau / Manager, Regulatory Assurance	TELEPHONE NUMBER (Include Area Code) (601) 437-2103
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
X	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A

14. SUPPLEMENTAL REPORT EXPECTED	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On April 7, 2016 the Grand Gulf Nuclear Station, while at 100 percent reactor thermal power, experienced a loss of Secondary Containment safety function during the performance of routine Secondary Containment building roof inspection. During the inspection activity the roof hatch, which allows access/egress to the roof, was left open for approximately 20 minutes. Based on a review of the work activity it is believed this error has occurred a minimum of 30 times in the past 5 years.

The direct cause of the event was the failure to close the hatch. The apparent cause of the event was the failure to establish adequate work instructions to maintain control of the hatch and to ensure Secondary Containment was maintained OPERABLE. Corrective actions include closure of the hatch and the establishment of the appropriate control over the hatch in the work instructions.

There were no actual nuclear safety consequences or radiological consequences during the event.

This condition is reportable in accordance with 10 CFR 50.73(a)(2)(v)(C). A 10CFR 50.72 notification was not performed because the event was not identified until after compliance was restored.



LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2018
Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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 an 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 NAME	2. DOCKET	3. LER NUMBER		
Grand Gulf Nuclear Station, Unit 1	05000 416	YEAR	SEQUENTIAL NUMBER	REV. NO.
		2016 - 003 - 00		

NARRATIVE

PLANT CONDITIONS PRIOR TO THE EVENT

100 percent reactor thermal power with no structures, components, or safety systems inoperable at the start of the event or contributing to the event.

DESCRIPTION

On April 7, 2016, while at 100 percent reactor thermal power, members of the Grand Gulf Nuclear Station (GGNS) staff were assigned to perform a routine inspection of the Secondary Containment [NG] roof surfaces and roof drain scuppers and screens. The purpose of this inspection was to verify the materials were in good working order and to identify any condition requiring maintenance/repair. The inspection is performed on a quarterly frequency and has been performed by the same lead individual for the past five years in the same manner. Therefore, it is estimated that the hatch has been inappropriately left open a minimum of 20 times in the past 5 years.

After obtaining permission to start work the personnel proceeded to the roof access hatch, [DR] proceeded through the hatch, and performed the required inspection activities. The inspection requires approximately 30 minutes to complete all of the required tasks.

Access to the roof is obtained via an access hatch that is normally closed and latched. The hatch can only be opened from inside the building. This required the personnel to leave the hatch open during the time period they were on the roof performing the inspection.

Leaving the hatch open for purposes other than immediate access or egress results in a breach of the Secondary Containment boundary and a loss of safety function for the Secondary Containment boundary. This event occurred on April 7, 2016. The Nuclear Regulatory Commission Senior Resident Inspector questioned the acceptability of leaving the hatch in the open position. Members of the GGNS staff, based on the challenges from the Senior Resident Inspector, evaluated the concern and it was determined this event was reportable as a loss of safety function.

REPORTABILITY

A Licensee Event Report is required pursuant to Title 10 Code of Federal Regulations (10 CFR) 50.73(a)(2)(v)(C) for an event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to: (C) control the release of radioactive material. Specifically, the hatch was left open.



LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET

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NARRATIVE

A 10CFR 50.72 notification was not performed because the event was not identified until after compliance was restored.

CAUSE

Direct Cause:

The failure to immediately close the hatch upon completion of egress from Secondary Containment Building.

Apparent Cause:

The failure to establish adequate work instructions to maintain control of the hatch and to ensure Secondary Containment was maintained OPERABLE.

CORRECTIVE ACTIONS

Immediate:

The hatch was closed and Secondary Containment integrity was restored.

Pending Action:

Work instructions for the work orders that require personnel to access/egress the Secondary Containment Roof Hatch will be revised to ensure the correct control of the hatch and maintenance of Secondary Containment OPERABILITY. The work instructions will be revised by June 30, 2016.

SAFETY SIGNIFICANCE

There were no actual nuclear safety consequences or radiological consequences during the event. The time period for which there could have been an unmonitored release during an event was approximately 20 minutes. However, no abnormal event or release occurred during the time of the event, therefore, no radiological consequence occurred.

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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 an 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.



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NARRATIVE

PREVIOUS SIMILAR EVENTS

LER 2015-002-00, Loss of Secondary Containment Differential Pressure during Drawdown Test

LER 2015-003-00, Technical Specification Surveillance on Primary Containment Isolation Valves

LER 2016-001-00, Engineered Safety Feature Actuation and Temporary Loss of Residual Heat Removal

Entergy has reviewed the above identified licensee event reports and has concluded that the causes and corrective actions associated with these licensee event reports could not have prevented the occurrence of the event documented in this licensee event report.