



Entergy Operations, Inc.
P. O. Box 756
Port Gibson, MS 39150

Eric A. Larson
Site Vice President
Grand Gulf Nuclear Station
Tel. (601) 437-7500

10CFR50.73

GNRO-2018/00015

April 10, 2018

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

SUBJECT: Licensee Event Report 2017-008-00, Failure to Perform/Document Diesel
Generator Common Mode Failure Evaluations
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

Dear Sir or Madam:

Attached is Licensee Event Report 2017-008-00, Failure to Perform/Document Diesel Generator Common Mode Failure Evaluations. This report is being submitted in accordance with 10CFR50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Eric A. Larson".

Eric A. Larson
Site Vice President
Grand Gulf Nuclear Station
EAL/jw

Attachment: Licensee Event Report 2017-008-00

cc: see next page

U.S. Nuclear Regulatory Commission
ATTN: Mr. Siva Lingam
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: Mr. Kriss Kennedy
Region Administrator, Region IV
Mail Stop OWFN 8 B1
Washington, DC 20555-0001

GNRO-2018/00015

Attachment

Licensee Event Report 2017-008-00



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by 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 05000416	3. Page 1 OF 3
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4. Title
Inadequate Diesel Generator Common Mode Failure Evaluations Result in Condition Prohibited by Technical Specifications

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
03	06	2017	2017	- 008	- 00	4	10	2018		05000
									Facility Name	Docket Number
										05000

9. Operating 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)(ii)(A)			<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.2201(d)			<input type="checkbox"/> 20.2203(a)(3)(ii)			<input type="checkbox"/> 50.73(a)(2)(ii)(B)			<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
	<input type="checkbox"/> 20.2203(a)(1)			<input type="checkbox"/> 20.2203(a)(4)			<input type="checkbox"/> 50.73(a)(2)(iii)			<input type="checkbox"/> 50.73(a)(2)(ix)(A)		
10. Power Level 76%	<input type="checkbox"/> 20.2203(a)(2)(i)			<input type="checkbox"/> 50.36(c)(1)(i)(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)(ii)			<input type="checkbox"/> 50.36(c)(1)(ii)(A)			<input type="checkbox"/> 50.73(a)(2)(v)(A)			<input type="checkbox"/> 73.71(a)(4)		
	<input type="checkbox"/> 20.2203(a)(2)(iii)			<input type="checkbox"/> 50.36(c)(2)			<input type="checkbox"/> 50.73(a)(2)(v)(B)			<input type="checkbox"/> 73.71(a)(5)		
	<input type="checkbox"/> 20.2203(a)(2)(iv)			<input type="checkbox"/> 50.46(a)(3)(ii)			<input type="checkbox"/> 50.73(a)(2)(v)(C)			<input type="checkbox"/> 73.77(a)(1)		
	<input type="checkbox"/> 20.2203(a)(2)(v)			<input type="checkbox"/> 50.73(a)(2)(i)(A)			<input type="checkbox"/> 50.73(a)(2)(v)(D)			<input type="checkbox"/> 73.77(a)(2)(ii)		
	<input type="checkbox"/> 20.2203(a)(2)(vi)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)			<input type="checkbox"/> 50.73(a)(2)(vii)			<input type="checkbox"/> 73.77(a)(2)(iii)		
			<input type="checkbox"/> 50.73(a)(2)(i)(C)			<input type="checkbox"/> Other (Specify in Abstract below or in NRC Form 366A)						

12. Licensee Contact for this LER

Licensee Contact Douglas Neve/Manager, Regulator 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	Manufacturer	Reportable To ICES	Cause	System	Component	Manufacturer	Reportable To ICES
A	EK	DG	Delaval	N					

14. Supplemental Report Expected <input type="checkbox"/> Yes (If yes, complete 15. Expected Submission Date) <input checked="" type="checkbox"/> No	15. Expected Submission Date Month: _____ Day: _____ Year: _____
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Abstract (Limit to 1400 spaces, i.e., approximately 14 single-spaced typewritten lines)

On March 6, 2017 at 1216 hours CST, the Diesel Generator (DG) Jacket Water Cooler Shell-Side Vent Valve was found with a broken stem, and could not be operated. The Condition Report (CR) screened the Division II DG as Inoperable. However, Grand Gulf Nuclear Station (GGNS) personnel failed to add the CR to the Limited Condition of Operation (LCO) tracker and no extent of condition for common cause failure for the other DGs is evident. Since the common cause evaluation was not adequately completed and Surveillance 3.8.1.2 was not performed within 24 hours, the unit should have been placed in Mode 3 within 12 hours, as required by Technical Specification 3.8.1. Therefore, Grand Gulf Nuclear Station was in a condition prohibited by Technical Specifications. No other component or system failures contributed to the event.

The cause of the failure to document the common cause evaluation resulted from a lack of reinforcement of documentation standards, and training will be performed to close this gap in Senior Reactor Operator formality.

The safety significance of this event is very low, since the condition did not represent an actual loss of function of either Division I or Division II emergency diesel generators for greater than its Technical Specifications completion time and the Division II diesel generator was successfully performed during its subsequent monthly surveillance run.



**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

(See NUREG-1022, R.3 for instruction and guidance for completing this form
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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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by 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 NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Grand Gulf Nuclear Station, Unit 1	05000-416	2017	- 008	- 00

NARRATIVE

A. PLANT CONDITIONS PRIOR TO THE EVENT

Grand Gulf Nuclear Station (GGNS) Unit 1 was operating at 76% power in Mode 1. There were no Structures, Systems, or Components that were inoperable that contributed to the event, except as described below.

B. DESCRIPTION

On March 6, 2017 at 1216 hours CST, the Diesel Generator [DG] Jacket Water Cooler Shell-Side Vent valve was found with a broken stem, and could not be operated. The Condition Report (CR) screened the Division II DG as Inoperable. However, Grand Gulf Nuclear Station (GGNS) personnel failed to add the CR to the Limited Condition of Operation (LCO) tracker and no extent of condition for common cause failure for the other DGs is evident. Since the common cause evaluation was not adequately completed and Surveillance 3.8.1.2 was not performed within 24 hours, the unit should have been placed in Mode 3 within 12 hours, as required by Technical Specification 3.8.1. Therefore, GGNS was in a condition prohibited by Technical Specifications.

This condition was identified in an NRC Problem, Identification, and Resolution Inspection (05000416/2017011) dated February 12, 2018. As a result of the Violation, an evaluation deemed this event reportable. An extent of condition for this event was completed, with four similar events identified, and summarized below:

On November 21, 2015, the Division 1 DG tripped on high vibrations during performance of its monthly run. The DG was screened as Inoperable, but LCO 3.8.1 Condition B.3.1 was not entered and no extent of condition for common cause failure for the other DGs is evident.

On October 24, 2015, a failed Shutdown Signal 3-Way Valve, part of the pneumatic control circuit for the Division 1 DG, prevented completion of the simulated run and the testing of the Division 1 DG, needed to return the DG to an operable condition. The CR was added to the LCO tracker; however, LCO 3.8.1 Condition B.3.1 was not entered, and no extent of condition for common cause failure for the other DGs is evident.

On October 22, 2015, a breaker providing power to the field flash did not pass overcurrent testing. The Division 1 DG was declared Inoperable for the failure of the field flash breaker. A CR corrective action was issued to perform an extent of condition. The CR had been added to the LCO tracker; however, LCO 3.8.1 Condition B.3.1 was not entered to track completion of the corrective action. There is a clear line of sight in the CR that Condition B.3.1 was satisfied late, and it was not documented in the LCO Tracking Module.

On October 22, 2015, during 1DG allowed outage time, a relay failed calibration. The CR screened the Division 1 DG as Inoperable, and a corrective action was issued to perform an extent of condition; however, LCO 3.8.1 Condition B.3.1 was not entered to track completion of the corrective action. There is documentation in the CR that Condition B.3.1 was satisfied, but the CR was not added to the LCO Tracking Module.

C. REPORTABILITY

This event is being reported under 10CFR50.73(a)(2)(i)(B), as a condition prohibited by Technical Specifications. Operators failed to satisfy Condition B.3.1, nor place the Unit in Mode 3 as required by Technical Specification 3.8.1.



**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

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Grand Gulf Nuclear Station, Unit 1	05000-416	2017	- 008	- 00

D. CAUSE

The gap in Senior Reactor Operator formality, specifically with regard to documentation of Action B.3.1 in TS 3.8.1, results from a lack of reinforcement of documentation standards.

E. CORRECTIVE ACTIONS

The following actions are completed or planned.

Completed:

- A Training Needs Analysis was performed to develop training to close the gap in Senior Reactor Operator Formality
- A Stand Down on Operability Documentation was performed with all of the operating crews

Planned actions included in the corrective action program which may be changed in accordance with the program:

- Training will be performed based on the Training Needs Analysis discussed above
- While training is being developed and delivered, Operations Management will review unplanned LCO entries to ensure they are properly documented in the LCO Tracking Module

F. SAFETY SIGNIFICANCE

The safety significance of this event is very low, since the condition did not represent an actual loss of function of either Division I or Division II emergency diesel generators for greater than its Technical Specifications completion time, and the Division II diesel generator successfully performed during its subsequent monthly surveillance run.

G. PREVIOUS SIMILAR OCCURRENCES

The four previous similar occurrences are described in the event description above.