SYSTEM ENERGY RESOURCES, INC.
A Middle South Utilities Company

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Vice President
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October 12, 1989

U.S. Nuclear Regulatory Commission
Mail Station P1 137
Washington, D.C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Report No. 50-416/89-19
dated 9/12/89 (MAEC-89/0280)
AECM-89/0187

System Energy Resources, Inc. hereby submits response to violation 50-416/89-19-01.

Yours truly,

WTC:cg
Attachment

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Notice of Violation 89-19-01

Technical Specification 6.8.1.a requires that written procedures be established, implemented and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, recommends that procedures for activities such as record retention, sampling of gaseous effluent systems and instrument air systems and should be covered by written procedures.

A. Surveillance Procedure 06-CH-1D17-W-0017, Gaseous Release Points Iodines, Tritium and Particulates, Step 5.1, Preparation of Filter Holder requires installation of clean filters in the clean filter holders.

Contrary to the above, the filter used for determining the Technical Specification iodine activity for the fuel handling area vent was not installed during the period July 19 through July 26, 1989.

B. Chemistry Procedure 08-S-03-21, Sampling Instrument Air Supply to ADS, Step 6.7, requires that if sample results are above the listed specifications, a MNCR be initiated with a seven day review.

Chemistry Procedure 08-S-03-10, Chemistry Sampling Program, Appendix 5, Action 3, requires notification of Nuclear Plant Engineering of the results and specifies that an engineering evaluation should be performed within seven days if results do not meet design specifications.

Contrary to the above, from October 1986 to October 1989, seven instrument air samples were performed which did not meet the sample acceptance criteria but only three MNCR's were generated and these did not meet the seven day evaluation period.

C. Chemistry Procedure 08-S-03-10, Chemistry Sampling Program, Attachment I, Item 53, requires instrument air to be sampled on a semi-annual basis.

Contrary to the above, the required semi-annual instrument air sample for 1989 was not obtained and analyzed.

D. Administrative Procedure 01-S-05-1, Nuclear Records Procedure, Step 5.2.1, requires, Superintendents/Supervisors to deliver plant records to records management for entry into the records system and storage as soon as practical after completion, but no later than 80 days.

Contrary to the above, the Chemistry Department failed to deliver instrument air sample data to records management for the 1988 samples.

I. Admission Or Denial Of The Alleged Violation

System Energy Resources, Inc. (SERI) admits to the alleged violation. This violation had no effect on the health and safety of the public.

II. Reason For The Violation, If Admitted

A. Failure to Install Iodine Activity Filter

This incident occurred because the weekly surveillance procedure (06-CH-1D17-W-0017) did not provide for documentation of visual inspection or verification of iodine activity filter holders prior to installation in the sample panel.

Complete details of this incident are documented and reported in Licensee Event Report Number 89-011.

B. Failure to Initiate Material Nonconformance Reports and Perform Required Seven Day Engineering Evaluations for Failed Instrument Air samples

This violation occurred because of inadequate measures to ensure implementation of SERI's commitment to initiate an MNCR and perform required engineering evaluations for failed instrument air samples.

C. Failure to Perform Semi-Annual Instrument Air Samples

On August 14, 1989, it was determined that a task card had not been generated to facilitate semi-annually sampling of the Instrument Air System required by Chemistry Procedure 08-S-03-10.

A subsequent investigation revealed that the last Instrument Air sample was taken October 28, 1988; therefore, the next sample should have been scheduled for May 28, 1989 (6 months from completion date). The required sample was not performed as delineated by Procedure 08-S-03-10.

Plant Administrative Procedure 01-S-07-7, Planning and Scheduling Plant Maintenance Work defines responsibility and requirements for administration and use of the Maintenance Planning and Scheduling System (MPSS). This system (MPSS) provides the mechanism by which a specific activity, i.e., surveillance, required maintenance, preventive maintenance etc., is required to be accomplished on a repetitive basis. Upon completion of an activity, the task card must be returned to the Maintenance Planner or Engineer for rescheduling.

The Instrument Air System semi-annual sampling requirement was not performed because the previous task card performed October 28, 1988 was not submitted to Planning for rescheduling. This incident occurred due to inadequate training of responsible Chemistry personnel.

D. Failure To Transmit Air Samples To Records Management

This incident occurred due to inadequate training of applicable Chemistry personnel on the requirements of Plant Administrative Procedure 01-S-05-1 relative to retention of permanent plant documents.

III. The Corrective Steps Which Have Been Taken And The Results Achieved

A. The following actions have been taken as a result of the failure to install an Iodine Activity Filter:

1. Chemistry Procedure 06-CH-1D17-W-0017 was changed to require documentation for disassembly and inspection of filter holders to verify filter cartridge installation.

2. Effluent releases for iodine and particulate were estimated for the July 19 through 26, 1989 time period. Estimations revealed releases well below the Technical Specification limits.

In addition to the above actions, the following enhancements have been made:

- A color code system was developed and will be used in the future to differentiate between auxiliary (spare) filter holders and permanent filter holders.

- A fabricated holder assembly will be used in lieu of an empty filter holder to complete flow paths during other testing activities, i.e., pump testing, etc.

B. The following actions have been taken as a result of the failure to initiate Material Nonconformance Reports and perform required Engineering Evaluations for failed Instrument Air Samples:

1. Chemistry Procedure 08-S-03-21, Sample Instrument Air Supply to ADS has been changed to require a Material Nonconformance Report be written, indicating that an Engineering Evaluation must be performed within seven days of initiation if any instrument air parameter fails the sample acceptance criteria. Appropriate Chemistry personnel have been trained on this requirement.

2. Plant Administrative Procedure 01-S-03-3, Material Nonconformance Report will be changed to require an Engineering Evaluation to be performed within seven days for any instrument air sample that fails to meet design requirements.

SERI plans to reevaluate the sever day engineering evaluation commitment (Reference: AECM-86/0238, dated August 26, 1986) upon issuance of a new site specific Air Quality Standard (SERI MS-38). This standard will provide acceptance criteria based upon system design requirements.

C. The following actions have been taken as a result of the failure to perform semi-annual Instrument Air samples:

A Quality Deficiency Report (QDR #246-89) was written to document and resolve this incident. The following corrective actions associated with this QDR have been taken:

- An Instrument Air sample was obtained and analyzed by Chemistry personnel. Results indicated that three sampling parameters were out of specification. As a result, MNCR #0270-89 was initiated to document and resolve this incident. Corrective action completion dates will be based on evaluation of the data obtained in response to this MNCR.

- A review of current Chemistry task cards was performed to ensure sampling commitments were met. This review indicated that all required Chemistry tasks were accomplished as required.

- Appropriate Chemistry personnel have been retrained on Plant Administrative Procedure 01-S-07-7, Planning and Scheduling of Plant Maintenance Work. Applicable scheduling reports generated by this procedure will be reviewed on a routine basis by the Chemistry Superintendent.

D. The following actions have been taken as a result of the failure to transmit Instrument Air samples to Records Management.

A Quality Deficiency Report (QDR #246-89) was written to document and resolve this incident. The following corrective actions associated with this QDR have been taken:

- A review of outstanding Chemistry documents and documentation practices was performed. Documents which were required to be transmitted to Nuclear Records were subsequently transmitted in accordance with the requirements of 01-S-05-1.

- Appropriate Chemistry personnel have been trained on the requirements of PAP 01-S-05-1 via the Required Reading Program.

IV. The Corrective Steps Which Have Been Taken To Avoid Further Violation

In addition to the specific actions delineated in Section III above, the following supplementary actions were taken:

1. The GGNS General Manager issued a Bulletin to all plant personnel (including contractors) to emphasize the importance of personnel performance (i.e., procedural compliance, attention to details, etc.) at the Grand Gulf Nuclear Station.

2. Quality Programs personnel performed an extensive audit of the Chemistry Department to assess in general, areas of effectiveness, efficiency and compliance with procedures. Several areas which could benefit from improvement were appropriately documented and will be resolved.

Utilization of the Quality Programs organization has proven to be exceptional in examining and identifying areas throughout the facility which may require additional emphasis by plant management. SERI feels that this approach will help strengthen present programs and prevent any future occurrences.

V. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by November 14, 1989.