

MISSISSIPPI POWER & LIGHT COMPANY

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JAMES P McGAUGHY JR. ASSISTANT VICE PRESIDENT

November 17, 1980

Office of Inspection & Enforcement U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, N.W. Suite 3100 Atlanta, Georgia 30303

Attention: Mr. J. P. O'Reilly, Director

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station

Units 1 and 2

Docket Nos. 50-416/417 File 0260/13525/15526

PRD-80/30, Status Report #2, Procedural Violation in

Cutting Rebar AECM-80/286

On June 2, 1980, Mississippi Power & Light Company notified Mr. M. Hunt of your office of a Potentially Reportable Deficiency (PRD) at the Grand Gulf Nuclear Station (GGNS) construction site. The deficiency concerns the cutting of rebar in violation of procedures. This deficiency was noted during Mr. Hunt's site inspection 416-80/12 of May 27-30, 1980.

Our progress in the investigation into the extent and scope of the deficiency is provided in the attached status report.

We expect to submit a determination of reportability and final report on this deficiency by August 1, 1981.

For J. P. McGaughy, Jr.

EWC:mt Attachment

cc: Mr. N. L. Stampley

Mr. R. B. McGehee

Mr. T. B. Conner

Mr. Victor Stello, Director Division of Inspection & Enforcement U. S. Nuclear Regulatory Commission Washington, D.C. 20555

STATUS REPORT #2 FOR PRD-80/30

I. Description of the Deficiency

During an NRC inspection visit to the site on May 27-30, 1980, it was found that rebar was cut in the Diesel Generator Building without being documented in accordance with work plan/procedure WP/P-C-24. The rebar had been cut during the installation of concrete expansion anchors for support of electrical equipment. A Notice of Violation was issued to MP&L as a result. Potential Reportable Deficiency (PRD) 80/30 was issued as a tracking mechanism for this nonconformity.

II. Resolution of Deficiency

As an immediate action in response to the deficiency, our Constructor issued a Stop Work. At that time, the procedures were judged adequate, and it appeared that the retraining of the crafts, supervision, and field engineers along with the establishment of a log in the electrical sector were sufficient actions to assure program compliance. The training was performed, and the Stop Work was lifted. Later, in addition to the training, the wording of the procedures was clarified to more precisely define the approval authorities required for rebar cutting. Sequential numbers on approval forms and a standarized form were other improvements added.

A detailed investigation compiled from the various disciplines (civil, electrical, instrumentation, and subcontractors) provided a record of the cut rebar logs in existence. However, in the case identified in the notice of violation, no record was being maintained and the cut rebar was logged only after the initiation of the investigation. The Constructor's Field Engineering has concluded that the electrical, instrumentation, and subcontractor disciplines may not have reported all cases of cut rebar.

III. Status

The analysis regarding the effect on safety of the cited cut rebar is in progress, but has not yet been determined. The Constructor's Field Engineering is currently working with their Project Engineering to develop a method to evaluate the unlogged cut rebar that may exist.

IV. Reasons for Delaying Final Report

The Constructor's Project Engineering and Field Engineering organizations have not yet developed a method for evaluating the unreported cut rebar that may exist. The probable approach to this problem will be to compare the "as built" configuration of structural surfaces to the instances reported of cut rebar, to identify the differences between the two, and to analyze their impact on structural integrity on a worst case basis.

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V. Projected Final Report Submittal Date

Although our investigation of the extent of unreported cut rebar is not yet complete, full compliance for new work has been achieved. We expect to submit a determination on reportability and a final report on August 1, 1981.