MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi
P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

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JAMES P. McGAUGHY, JR.
ASSISTANT VICE PRESIDENT

March 5, 1982

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, Regional Administrator

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416
File 0260/15525/15526
RII: AGW 50-416/81-56
IE Inspection Report 81-56 of
November 16-December 15, 1981
AECM-82/76

Reference: MAEC-82/016, 01/20/82

This letter provides our response to the two (2) NRC Violation Items as transmitted by your letter MAEC-82/016, dated January 20, 1982.

Our response is being submitted with three (3) Attachments. Attachment A is the response to 416/81-56-02, Attachment B is the response to 416/81-56-03, and Attachment C documents the actions taken or planned to improve the effectiveness of our program for assuring that systems will perform adequately in service.

We acknowledge and appreciate your cooperation in granting an extended period of time for making this response.

Yours truly,

JPM:dr
ATTACHMENT

8203250505 820317
PDR ADOCK 05000416
G PDR

cc: Mr. N. L. Stampley
Mr. R. B. McGehee
Mr. T. B. Conner

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. G. B. Taylor
South Miss. Electric Power Association
P. O. Box 1589
Hattiesburg, MS 39401

Director of Office of Inspection & Enforcement

STATE OF MISSISSIPPI
COUNTY OF HINDS

Personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, J. P. McGaughy, Jr., who being by me first duly sworn, stated on oath that he signed the above and foregoing on the date and year therein mentioned, and that the information contained therein is true and correct to the best of his knowledge and belief.

J. P. McGaughy, Jr.

SWORN TO AND SUBSCRIBED before me, this the 5th day of March 1982.

Notary Public

My Commission Expires:

My Commission Expires Feb. 13, 1985.

VIOLATION 416/81-56-02

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company acknowledges that this is a violation of NRC requirements.

II. REASON FOR THE VIOLATION

The Startup Test Supervisor directed the removal of a temperature switch from a channel not under test to be placed in a channel being actively tested. This was not in accordance with administrative procedures controlling Temporary Alterations.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The Startup Supervisor has conducted several four to five hour long training presentations which included the administrative controls controlling Temporary Alterations. As of December 4, 1981, approximately 95% of all Test Supervisors had been given this training.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A. The training conducted on the revised Startup Manual requirements should preclude recurrence of this item.

B. The remaining 5% of Test Supervisors that did not attend these sessions will be required to complete a documented review of Startup Manual requirements prior to performing testing.

C. Startup is performing a documented review and evaluation of all preoperational test procedures that were in progress at the time of the violation. This evaluation will determine the validity of testing conducted to date. Specific corrective actions will be taken for all problems identified on a case-by-case basis before a test procedure may be recommenced. The evaluation committee is composed of Senior Startup personnel and MP&L Plant Quality Representatives.

D. Additional corrective actions were imposed by MP&L Management as described in Attachment C to this document.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MP&L has completed all formal training sessions on the Startup Manual revisions. Additional personnel who did not attend will be required to review the Startup Manual as revised prior to performing any preoperational testing. MP&L is in full compliance with the restart program as outlined above.

VIOLATION 416/81-56-03

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company acknowledges that this a violation of NRC requirements.

II. REASON FOR THE VIOLATION

The Startup Test Supervisor during the performance of the preoperational test (1E51PT01, Reactor Core Isolation Cooling System preop test) directed the removal of a temperature switch from a channel not under test to be used in the channel being actively tested. He directed this activity under the authority of a "blanket" Maintenance Work Order which provided manpower support of system run-in activities but which did not specify retest requirements.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A. The MP&L Startup Manual has been revised, SUM 5000 Revision 6 and SUM 7000 Revision 6, to allow for an activity called TIPE (Test Interruption for Problem Evaluation). These activities are to be performed under an approved Maintenance Work Order which will specify retest requirements.

B. The Startup Supervisor conducted several four to five hour long training presentations covering the above, as well as other Startup Manual administrative testing requirements. As of December 4, 1981, approximately 95% of all Startup Test Supervisors had attended these training sessions.

C. A documented review and evaluation of all preoperational test procedures that were in progress at the time of the violation is being conducted. The evaluation is to determine the validity of testing conducted to date. Specific corrective actions will be taken for all problems identified on a case-by-case basis before a test procedure may be recommenced. The evaluation committee is composed of Senior Startup personnel and MP&L Plant Quality Representatives.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A. The remaining 5% of Startup Test Supervisors who were unable to attend will be required to perform a documented review of the revised Startup Manual revisions prior to performing any further preoperational testing.

B. The review and evaluation process to evaluate validity of testing conducted to date on systems which have not been released will prevent future reoccurrences. Specific problems encountered will be corrected prior to recommencement of the respective test.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MP&L is in full compliance with the restart program as outlined above.

In your letter of January 20, 1982, which forwarded Report 50-416/81-56, you stated a concern with respect to the implementation of our quality assurance program that had permitted occurrence of the above stated violations. You requested a description of the actions taken or planned to improve the effectiveness of our quality assurance program with respect to these items. Following our review, we have taken the actions described below.

A. Plant Staff

Due to the decline in testing activities the existing Temporary Alterations Program will be replaced with an Operations Alterations Program on the following schedule:

(1) Administrative Procedure 01-S-06-3 will be revised by March 11, 1982, to provide for only one type of alteration. This will be an Operations Alteration.

(a) These alterations will consist of sequentially pre-numbered jumper wires and phelonic "chits" that are maintained and distributed by the Operations Shift Superintendent.

(2) Starting March 1, all temporary alterations on Green and White Systems will be converted to the Operations Alteration under the authority of a standing order.

(a) All Green and White Systems will be converted by March 7, 1982.

(b) All other systems will have their temporary alterations converted to Operations Alterations prior to turnover to Plant Staff (Green and White).

(3) On April 1, 1982, no new temporary alterations will be issued except Operations Alterations.

(4) Between April 1, 1982 and April 15, 1982, all non Green and White tagged systems will have all of their temporary alterations converted to Operations Alterations or deleted.

(5) By April 15, 1982, all temporary alterations in the GGNS Unit 1 will be Operations Alterations and will be controlled by the Operations Superintendent.

B. Quality Assurance

1. Quality Assurance escalated the inadequate corrective action on temporary alterations to the Senior Vice President - Nuclear as a result, a management meeting was held between the Senior Vice President - Nuclear, the Assistant Vice President - Nuclear Production, and the Manager of Quality Assurance.

2. As a result of the above meeting, the Assistant Vice President - Nuclear Production directed additional emphasis be placed on control of temporary alterations as detailed in Item C below.

3. Quality Assurance will implement the week of April 19, 1982 an audit program of at least one audit/monitoring audit per month of this area until all outstanding Corrective Action Request (CARs) have been closed and until two consective months elapse with no further nonconformances identified.

C. Assistant Vice President - Nuclear Production directed the following additional actions.

To enable independent accessment of the implementation of our Temporary Alteration program the following will be placed in effect through March 31, 1982.

1. A Bechtel engineer will be assigned to each shift for the sole purpose of reviewing temporary alterations which are not identified in an approved test procedure. This engineer will be assigned by March 5, 1982. Written directions will be provided to Shift Superintendents to assure that this individual s made aware of each new temporary alteration. The Bechtel engineer shall also review previously completed temporary alterations which may affect preop testing being conducted on his shift.

2. Any deficiencies identified during this review will be promptly identified and documented for further processing.

3. The Bechtel engineer will be required to keep a log of his actions. This log shall include all temporary alterations issued on each shift, identification of all tags issued, previously completed temporary alterations that were reviewed during each shift, and identification of deficiencies issued under Item 2.

We feel that the above actions will enhance the effectiveness of the implementation of our program for assuring that system will perform properly in service. We have also directed independent evaluations of these measures to assess their value. These assessments will be reviewed by senior MP&L management and appropriate established review committees and additional steps or modified practices will be instituted as necessary.