



**System
Energy**

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May 18, 1990

William T. Cottle
Vice President
Nuclear Operations

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
Final Response to Generic Letter
89-04, Guidance on Developing
Acceptable Inservice Testing
Programs
AECM-90/0088

- Reference: 1) AECM-89/0182, dated October 3, 1989, Request for Extension for Generic Letter 89-04, Guidance on Developing Acceptable Inservice Testing Programs
- 2) NRC Letter dated November 21, 1989 (MAEC-89/0343), Response to Generic Letter 89-04

System Energy Resources, Inc. (SERI) via Reference 1 provided a status of the GGNS inservice testing (IST) program development and requested an extension until May 18, 1990 to the schedule requirements for response to Generic Letter 89-04. The request for extension was based on the level of effort required to complete a thorough evaluation of potential changes to the program, along with revising the GGNS IST program and the appropriate implementing procedures. The NRC approved this extension request as discussed in Reference 2.

SERI has completed the actions necessary to meet the positions in Generic Letter 89-04. Attachment 1 presents a listing and status of existing and new relief requests against the Grand Gulf Nuclear Station (GGNS) IST program and provides the means for approval of each relief request currently in the program. Attachment 2 provides a copy of the revised GGNS Pump and Valve Inservice Testing Program (Revision 4) including the specific relief requests discussed in Attachment 1. As a result of our evaluation conducted for Generic Letter 89-04, certain valves have been added to the GGNS IST program and are included in Revision 4 of the IST program.

Based on the evaluation performed and the changes implemented in the GGNS IST program, SERI concludes that the Grand Gulf Nuclear Station Unit 1 Pump and Valve Inservice Testing Program (Attachment 2) conforms to the NRC positions in the Generic Letter 89-04. No equipment modifications are required as a result of changes being made to the revised IST program.

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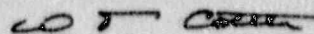
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IST program procedures have been written or revised as necessary to implement the revised GGNS IST program. Procedural actions modified or developed as a result of the revised IST program will become effective at the next scheduled component surveillance.

Please advise this office if you have any questions.

Yours truly,



WTC:tkm

Attachments: 1) IST Program Relief Request Status
2) GGNS IST Program (Revision 4)

Enclosure: Affirmation for Response to Generic Letter 89-04

cc: Mr. D. C. Hintz (w/a)
Mr. T. H. Cloninger (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)
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BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

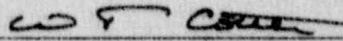
LICENSE NO. NPF-29

DOCKET NO. 50-416

IN THE MATTER OF
MISSISSIPPI POWER & LIGHT COMPANY
and
SYSTEM ENERGY RESOURCES, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

I, W. T. Cottle, being duly sworn, state that I am Vice President, Nuclear Operations of System Energy Resources, Inc.; that on behalf of System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by System Energy Resources, Inc. to sign and file with the Nuclear Regulatory Commission, this response to Generic Letter 89-04 for the Grand Gulf Nuclear Station; that I signed this response as Vice President, Nuclear Operations of System Energy Resources, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

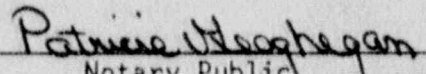


W. T. Cottle

STATE OF MISSISSIPPI
COUNTY OF CLAIBORNE

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 18 day of May, 1990.

(SEAL)



Notary Public

My commission expires:
~~My Commission Expires July 1, 1990~~

EVALUATION OF GRAND GULF UNIT 1 RELIEF REQUESTS
IN THE IST PROGRAM REVISION 4 USING
GENERIC LETTER 89-04 GUIDANCE

The GGNS IST Program Revision 4 contains 6 Generic Relief Requests and 8 system specific Relief Requests in the Valve Program, and the Pump Program contains 1 Generic Relief Request and 11 system specific Relief Requests. Each of these relief requests was reviewed against the NRC positions contained in the NRC Generic Letter No. 89-04. Based on this review each relief request was placed in one of two categories with respect to NRC approval. These categories are:

Category 1: Relief request is approved as a result of being on the docket prior to April 3, 1989, and relate to topics not discussed in Generic Letter 89-04 (per Question 73 of NRC letter of October 25, 1989, Minutes of Public Meetings on GL 89-04).

Category 2: Relief request is in conformance with Generic Letter 89-04 Attachment 1 positions.

The results of this review are listed in Table 1, Current IST Program Relief Requests. The specific GGNS relief requests are provided in the revised GGNS IST program (Attachment 2).

As a result of the IST program review against Generic Letter 89-04, a number of valve relief requests were found to no longer be necessary since they addressed components that are not ASME Code Class 1, 2 or 3, or the relief request concerned a subject specifically addressed and approved by the Generic Letter. These relief requests are listed in Table 2. To document the method of testing or the new valve relief requests being used, the withdrawn relief requests were converted to comments to the appropriate Valve Summary Listings as necessary.

Additionally, Relief Request E12-2 in Table 2 is withdrawn since the relief request concerned testing of RHR steam condensing mode valves that are restricted from being operated in the open direction in accordance with the resolution of Humphrey concerns for GGNS (NRC letter of March 23, 1987). The valves are tested closed in accordance with Code and Generic Letter requirements.

TABLE 1
 Current IST Program Relief Requests

<u>Type</u>	<u>Number</u>	<u>Category</u>	<u>Approval Status</u>
Valve Generic	1	1	Granted
	2	2	Granted
	3	1	Granted
	4	2	Granted
	5	1	Granted
	6	2	Granted
Valve	B21-1	1	Granted
	B21-2	1	Granted
	B21-3	1	Granted
	B21-4	2	Granted
	C11-1	2	Granted
	C41-1	1	Granted
	E51-2	1	Granted
	P41-1	1	Granted
Pump Generic	1	1	Granted
Pump	C41-1	1	Granted
	E12-1	1	Granted
	E12-2	1	Granted
	E21-1	1	Granted
	E21-2	1	Granted
	E22-1	1	Granted
	E22-2	1	Granted
	P75-1	1	Granted
	P75-2	1	Granted
	P81-1	1	Granted
P81-2	1	Granted	

TABLE 2

Deleted Valve Relief Requests

<u>Number</u>	<u>Valves</u>	<u>Reason For Deletion</u>
E12-1	F046A,B,C	Addressed by new Relief Request approved by GL 89-04
E12-2	F103A,B F104A,B	Relief Request not needed
E12-3	F273 F274 F278	Addressed by new Relief Request approved by GL 89-04
E51-1	F030	Addressed by new Relief Request approved by GL 89-04
E51-3	F021	Addressed by new Relief Request approved by GL 89-04
P75-1	F507A,B,C,D F508A,B,C,D	Non-ASME Class components - Relief Request not required
P75-2	F077A,B F078A,B	Non-ASME Class components - Relief Request not required
P75-3	F045A,B F050A,B F059A,B	Non-ASME Class components - Relief Request not required
P75-4	F080A,B F094A,B F095A,B F096A,B F097A,B	Non-ASME Class components - Relief Request not required
P75-5	F007A,B F034A,B F038A,B	Non-ASME Class components - Relief Request not required
P81-1	F503A,B F504A,B	Non-ASME Class components - Relief Request not required
P81-2	F059A,B F060A,B	Non-ASME Class components - Relief Request not required