

MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi
P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

April 2, 1982

NUCLEAR PRODUCTION DEPARTMENT

Mr. Al Schwencer, Chief Licensing Branch No. 2 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Schwencer:

SUBJECT: Grand Gulf Nuclear Statlot

Units 1 and 2

Docket Nos. 50-416 and 50-417

File: 0277/0755/L-860.0

TMI Action Item I.G.1, "Training During

Low Power Testing"

Ref: 1) AECM-81/84, April 7, 1981 2) AECM-81/281, August 18, 1981 3) AECM-81/471, December 4, 1981

AECM-82/107

In response to your letter dated February 19, 1982, Mississippi Power & Light Co. (MP&L) provides the following additional information with regard to RCIC testing. Reference 1) proposed that, in lieu of the proposed loss of AC power test required for NUREG-0737 item I.G.1 requirements, three expanded RCIC tests and two additional tests be performed. In reference 2) MP&L committed to performing the loss of station AC power test.

Reference 3) then clarified that, since the loss of station AC power test was being performed, the proposed expanded scope of RCIC testing would not be performed. However, this was not to be construed as a deletion of RCIC testing as required by Regulatory Guide 1.68; but only a deletion of the expanded testing over and above required RCIC preoperational testing. In addition, with regard to the two additional tests, the integrated reactor pressure vessel level functional test will be performed, but the integrated drywell and containment pressure instrumentation test will not be performed.

Regulatory Guide 1.68, Rev. 2, Appendix A.1.C, requires demonstration of electrical independence for residual or decay heat removal systems. Additionally, Regulatory Guide 1.41, "Preoperational Testing of Redundant On-Site Electric Power Systems to Verify Proper Load Group Assignments", is referenced for guidance on this testing.

Regulatory Guide 1.41 requirements have been, and are being, met by testing that is a part of the standard testing performed during BWR startups. At Grand Gulf, Preoperational Test 1E71-PT01 verifies required equipment performance during a LOCA with Loss of Offsite Power (LOP) and a LOCA with each of the three ECCS Divisions de-energized (both AC and DC) individually. During the LOP and divisional separation LOCA tests, the RCIC initiation status, Gland Seal Compressors, and the three DC valves that must operate during a normal automatic start sequence are monitored for proper response.

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In summary, the above described testing adequately performs the electrical independence testing applicable to RCIC that is required by Regulatory Guides 1.68, Rev. 2 and 1.41 (3/16/73). Only the expanded RCIC testing or additional testing which was proposed in lieu of a loss of station AC test will be deleted.

If you have any questions, please advise.

Yours truly,

L. F. Dale

Manager of Nuclear Services

WWK/SHH/JDR:rg

cc: Mr. N. L. Stampley

Mr. R. B. McGehee

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