MISSISSIPPI POWER & LIGHT COMPANY Helping Build Mississippi P. O. BOX 1640, JACKSON, MISSISSIPPI 39205 May 10, 1982

NUCLEAR PRODUCTION DEPARTMENT

U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Washington, D.C. 20555

Attention: Mr. Harold, R. Denton, Directo

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station Units 1 and 2 Docket Nos. 50-416 and 50-417 File: 0260/0756/L-800.0 Ref: AECM-82/193, dated April 30, 1982 Hydrogen Ignition System Emergency Procedures AECM-82/207

In the referenced letter, Mississippi Power & Light (MP&L) submitted a copy of the preliminary Revision 10 to emergency procedure 05-S-01-EP-7 "Core Cooling Without Level Restoration," the results of a review of emergency procedures with regard to hydrogen control provisions, and a copy of the relevant Technical Specification 3/4.6.7.2 "Containment and Drywell Hydrogen Ignition System."

Four revisions to 05-S-01-EP-7 were identified in the referenced letter, three of which involved manual initiation of containment spray based on wetwell temperature.

Concern for the suitability of wetwell temperature as a reliable indicator for when hydrogen burns first occur (indicating the need for containment spray) has been expressed in discussion with your staff.

In order to resolve this concern, the two revisions indicated below will be made rather than the four revisions identified in the referenced letter. The results of the review and the other material transmitted by that letter have not changed. The new revisions are:

- Step 3.6.2 will be revised to read "Start the Hydrogen Igniter System by energizing the system using hand switches 1E61-HS-M650 A&B."
- Add Step 3.6.3 "Initiate containment spray using procedure SOI (04-1-01-E12-1)."

It should be noted that this change will result in initiation of containment spray prior to any hydrogen burns occurring contrary to the assumption used in most of the containment response analyses submitted by MP&L that containment spray is actuated after the first hydrogen burn as modeled by the CLASIX-3 computer code. The result of this difference would be to further mitigate the consequences of hydrogen burns, particularly the temperatures during the first burn; however, MP&L does not plan, at this time, to submit additional containment response analyses to be consistent with this assumption.

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The original reason for basing the initiation of containment spray on wetwell temperature was to maximize operational flexibility in dealing with a situation which might result in a degraded core until containment spray was actually needed. MP&L still believes this is desirable, and if, based on further investigations, it is determined that there are reliable indications with adequate margin of when hydrogen burns first occur, MP&L reserves the right to submit these investigations and to further modify this emergency procedure.

Yours truly,

Hickarda for

L. F. Dale Manager of Nuclear Services

SHH/JDR:rg

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

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

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