



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

January 5, 1983

JAMES P. MCGAUGHY, JR.
ASSISTANT VICE PRESIDENT

Office of Inspection and 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
Unit 1
License No. NPF-13
Docket No. 50-416
File 0260/15525/15526
I. E. Report No. 82-69,
dated November 26, 1982
AECM-83/007

Reference: AECM-82/269, 11/26/82

This letter provides our response to NRC Violations 416/82-69-01 and 416/82-69-02, transmitted by your letter dated November 26, 1982.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATIONS

Mississippi Power & Light Company admits to the violations as stated.

II. THE REASONS FOR THE VIOLATIONS IF ADMITTED

A. Violation 82-69-01

1. An LCO was entered on July 30, 1982 because required fire protection insulation had not yet been installed on some safety-related cable and cable trays, and an hourly fire watch was established. By way of letter AECM-82/453 dated August 5, 1982 MP&L had requested relief from full compliance with Regulatory Guide 1.75 until 1% power. MP&L believed that this letter constituted the required Special Report, therefore an incident report was not generated and an additional Special Report was not prepared and submitted. Additionally, MP&L had been verbally informed by NRR that a license amendment would not be necessary on this case so long as MP&L complied with Technical Specifications regarding posting of required fire watches.

DE01

2. A designated fire watch was not assigned at the location of the removed hatch cover because the involved personnel failed to notify the Shift Superintendent of the open hatch.
3. A designated fire watch was not assigned at the locations of the blocked open fire doors in fire rated assemblies because the involved personnel failed to notify the Shift Superintendent of the open doors.

B. Violation 82-69-02

1. Until this item was identified via Inspection Report 82-56 MP&L had not considered these lighting systems as part of the fire protection program. Work was begun at that time to identify all of the individual units (of which there are approximately 400-500) and to develop the appropriate procedures. This work was incomplete at the time of this inspection.
2. Fire detector zones 2-15 and 2-18 were overlooked during development of Surveillance Procedure 06-IC-SP65-1001.
3. During the construction phase, fire protection barriers were not considered as safety-related and the architect-engineer drawings reflect this. Upon assuming design control responsibility for the unit it was necessary for MP&L to identify the barriers needing to be placed under the Operational Quality Assurance Program. This effort is not complete.

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

A. Violation 82-69-01

1. Incident Report 82-11-7 was written to document the incomplete fire protection provisions and Incident Report 82-11-2 was written to document failure to submit the required Special Report. An interim report was submitted to NRC on November 17, 1982 via letter AECM-82/555.
2. An LCO was entered due to removal of the fire rated hatch cover. The hatch cover was installed and sealed on November 29, 1982 and the LCO was removed.
3. The fire doors found open were immediately restored to their closed position.

Concerning items 2. and 3. above, appropriate Plant Staff personnel have been made aware of the requirement to notify the Shift Superintendent and to establish a fire watch when fire rated assemblies and sealing devices are open.

B. Violation 82-69-02

1. General Maintenance Instruction 07-S-12-108 has been issued establishing the activities which will control inspection and testing of emergency lighting systems. MP&L is presently inspecting the necessary lighting systems per this Instruction.
2. Fire detector zones 2-15 and 2-18 have been satisfactorily inspected per Surveillance Procedure 06-IC-SP65-1001.
3. The Nuclear Plant Engineering staff is revising the applicable penetration schedules to reflect the safety-related status of fire barriers.

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

A. Violation 82-69-01

1. No further action is planned except for submittal of a final report.
2. No further action is planned.
3. Signs are being manufactured for placement on fire doors which will denote that the Shift Superintendent's permission is required if the doors are to be blocked open.

B. Violation 82-69-02

1. No further action is planned.
2. Fire detector zones 2-15 and 2-18 will be included within the scope of Surveillance Procedure 06-IC-SP65-1001.
3. The revision of the penetration schedules and placement of appropriate barriers under the QA program will be completed.

V. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

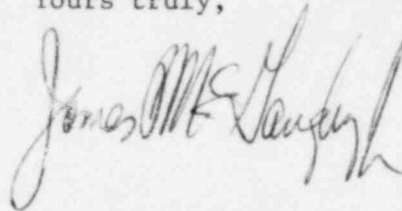
A. Violation 82-69-01

1. Full compliance has been achieved.

2. Full compliance has been achieved.
 3. Full compliance has been achieved. The door signs will be in place by March 15, 1983.
- B. Violation 82-69-02
1. Inspections are expected to be complete and full compliance achieved by March 1, 1983.
 2. The surveillance procedure is expected to be revised and full compliance achieved by March 1, 1983.
 3. All planned actions are expected to be complete and full compliance achieved by March 1, 1983.

This response was originally due on December 23, 1982 but in a conversation between Mr. D. M. Verelli of your office and Mr. L. F. Dale of our office an extension was granted until January 5, 1983.

Yours truly,



LFD:jh

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

Mr. Richard C. DeYoung, Director
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