



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

September 29, 1982

NUCLEAR PRODUCTION DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-13  
File: 0292/5428  
References: AECM-81/25  
AECM-81/52  
Emergency Response Facility Schedule  
AECM-82/398

As discussed with your staff as early as October 30, 1980, Mississippi Power & Light Company (MP&L) has taken action to expeditiously implement the NRC requirements for Emergency Response Facilities. The Nuclear Regulatory Commission issued their Final Report on the Functional Criteria for Emergency Response Facilities (NUREG-0696) on February 18, 1981. On February 12 (AECM-81/52) and April 8, 1981, (AECM-81/25) MP&L submitted detailed design specifications and descriptions for the GGNS Emergency Response Facility Information System (ERFIS), Safety Parameter Display System (SPDS), Technical Support Center (TSC), Operational Support Center (OSC) and Emergency Operations Facility (EOF). Since these dates MP&L has moved expeditiously on the construction and installation of these facilities. However, because of the complex nature of NUREG-0696 requirements and the state of the art engineering required to meet them, we have encountered some delays in our original implementation schedules. While most of the facilities are operational, the EOF and the ERFIS (SPDS) will not be complete by our previous commitment of October 1, 1982.

As described in the referenced letters, the ERFIS will provide the data compilation, calculational and display capability for the SPDS and the Class A Dose Assessment model. The hardware and most of the software for this system have been designed, developed and installed. By delaying the operational date for ERFIS neither the safety nor the emergency response capability of GGNS will be degraded, since all SPDS and dose assessment parameters are monitored by the Balance of Plant computer and are displayed by Control Room instrumentation.

The GGNS EOF will provide an onsite location where MP&L can manage its resources in response to an emergency having actual or potential environmental consequences. The structural portion of the EOF will essentially be complete

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by October 1, 1982. However, certain essential systems cannot be installed by this date, thereby delaying the operational date of the EOF. These systems include the telephone system and the air conditioning/ventilation system. The emergency response capability of GGNS will not be affected by delaying the EOF, because the interim EOF will be available until the permanent EOF is operational.

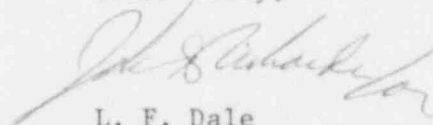
The previous approval of SECY-82-111, "Requirements for Emergency Response Capability" by the NRC Commissioners and the recent submittal of SECY-82-111B for final approval, indicates that all further consideration of individual aspects of emergency response should be integrated into a comprehensive review plan in which former schedules and guidance should be reconsidered on a plant specific basis. The NRC also states that the requirements and guidance contained in SECY-82-111B will supercede items I.C.1, I.D.1, I.D.2, and III.A.1.2 of NUREG-0737 and should be used by the licensee in meeting the goals of the revised action plan items.

The NRC's most recent policy indicates that a letter will be transmitted to all operating licensees and construction permit holders to provide a comprehensive schedule and plan for the phased implementation and integration of all emergency response activities. The NRC Project Manager and the licensee will then develop a mutually acceptable plan for final implementation. Based on this, MP&L believes that specific completion dates for the EOF and ERFIS (SPDS) systems should not be established at this time. Following receipt of said letter, an appropriate schedule for an integrated approach of the emergency response activities with a phased implementation will be provided.

In light of SECY-82-111, our previous intent and efforts to meet the NRC requirements and implementation schedule, and the delay of GGNS's full power license, we request that the final implementation of the Emergency Response Facility be delayed until further action can be considered.

Please contact this office for any additional information that you may require.

Yours truly,



L. F. Dale  
Manager of Nuclear Services

SAB/GOS/LRM/JDR:rg

cc: (See Next Page)

## MISSISSIPPI POWER &amp; LIGHT COMPANY

cc: Mr. N. L. Stampley (w/a)  
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