

MISSISSIPPI POWER & LIGHT COMPANY Helping Build Mississippi P. O. BOX 1640, JACKSON, MISSISSIPPI 39205 November 9, 1982

## NUCLEAR PRODUCTION DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station Units 1 and 2 Docket Nos. 50-416 and 50-417 License No. NPF-13 File 0260/L-350 Safety-Related Display Instrumentation - SER Section 7.5 AECM-82/539

References:

- 1. AECM-82/78, April 1, 1982
- 2. AECM-82/317, July 15, 1982

During conversations on November 5th and 8th, 1982, the Instrumentation and Control Systems Branch (ICSB) requested confirmation that the safety classification and qualification of instrumentation in Table 7.5-1 of the Grand Gulf FSAR was consistent with the guidance in H. R. Denton's memorandum, <u>Standard Definitions For Commonly-Used Safety Classification Terms</u>, November 20, 1981. The Mississippi Power & Light Company (MP&L) response and related commitments are discussed below:

## 1. Classification and Qualification of Instrumentation

The term "Safety-Related Display Instrumentation" (SRDI) is derived from Regulatory Guide 1.70 and, as such, is not entirely consistent with the November 20, 1981, guidance. The term "Display Instrumentation Important to Safety" would be more appropriate for the listing in FSAR Table 7.5-1. The Table 7.5-1 instruments designated as "Post-Accident Tracking" are safety-related; their qualification is discussed in MP&L letter AECM-82/78, Reference 1 above.

2. Completeness of Instrumentation Classification

Based on the reviews conducted during the design evolution of Grand Gulf, it is MP&L's position that the instruments currently designated as post-accident tracking provide sufficient indications for the operator to take manual actions necessary to assure required safety functions and that no additional display instrumentation need

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be classified and qualified as safety-related. However, as part of the Regulatory Guide 1.97 (Rev. 2) program discussed in AECM-82/317 (Reference 2), MP&L will reevaluate its position on display instrumentation. The reevaluation will include a review of the plant emergency procedures utilizing the criteria in the November 20, 1981 Denton memorandum to determine if any display instrumentation should be upgraded to safety-related. The reevaluation will be completed prior to startup following the first refueling outage; any instrumentation changes resulting from the reevaluation will be reported in the appropriate section in FSAR Chapter 7.

## 3. SER Section 7.5.1 Modification

The second paragraph of Section 7.5.1 of the Grand Gulf Safety Evaluation Report (SER), states that the Grand Gulf SRDI is seismically qualified. In light of the discussion above, this SER section should be modified to state that post-accident tracking instrumentation is seismically qualified.

With the information and commitments provided in this letter, MP&L considers this issue resolved for full power licensing. If you have any further questions, please do not hesitate to contact us.

Very truly yours, helard\_

L. F. Dale Manager of Nuclear Services

MJD/SHH/JDR:sap

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

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