November 12, 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
Units 1 and 2
Docket Nos. 50-416 and 50-417
License No. NPF-13
File 0290/0272/0296/1090
Ref: AECM-82/104
AECM-82/299
AECM-82/508
GGNS Emergency Operating
Procedures; GGNS SER
22.2-I.C.7 and I.C.8
AECM-82/543

Please find attached a copy of Revision 12 to the GGNS Emergency Operating Procedures (EOP) as committed by our letter of November 3, 1982 (AECM-82/508). An advance copy of these procedures was informally transmitted to Mr. Jim Clifford (PTRB) on November 10, 1982 for his review. These procedures are based on our original EOP submittal of April 15, 1981 (AECM-81/140) and Revision 1B of the BWROG EPGs. Mississippi Power & Light Company (MP&L) has elected to incorporate only selected technical comments from the GE NSSS vendor review performed in accordance with item I.C.7 of NUREG-0737 as agreed upon with Mr. Clifford. We believe that this EOP revision will address the previously recognized NRC human factors concerns and at the same time resolve the NSSS vendor review comments. This submittal supercedes our previous submittal incorporating vendor review comments (AECM-82/299). Certain technical additions specific to GGNS have also been included.

It is MP&L's intent to pursue further upgrading of the GGNS EOPs in accordance with item I.C.8 on a schedule consistent with the upgrading of other emergency response capability aspects of SECY-82-111. This will include continued upgrading to Revision 2 of the BWROG EPGs, the INPO Writing Guidelines, and any future EOP guidance modifications. Our specific implementation schedule for future procedure preparation, development of a GGNS specific writers guide, procedure verification, and operator training will be established in our response to the expected NRC 50.54(f) letter as directed by SECY-82-111B.

MP&L believes this submittal, pending the NRC's review, meets the present requirements of NUREG-0737, items I.C.7 and I.C.8 for a full power operating license on GGNS. A meeting to resolve any significant NRC comments has been

MISSISSIPPI POWER & LIGHT COMPANY

rescheduled for November 17 and 18, 1982, if required. In order to maintain our present licensing schedule, we request your expeditious review to support this meeting or provide your approval.

Yours truly,

L. F. Dale

Manager of Nuclear Services

SAB/JGC/JDR:sap Attachment

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

Mr. R. B. McGehee (w/o)

Mr. T. B. Conner (w/o)

Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/a) Office of Inspection & Enforcement U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/a)
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