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

JAMES P. McGAUGHY, JR.
ASSISTANT VICE PRESIDENT

February 19, 1982

Office of Inspection & 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
Units 1 and 2
Docket Nos. 50-416/417
File 0260/15525/15526
Unresolved Item 81-60-01 &
Final Report, Rebar deficiency,
PRD 77/08
AECM-82/68

References: Inspection Report No. 50-416/81-60
Inspection Report No. 50-416/81-25
PRD-77/08
PRD-81/36

A routine inspection of our facility was conducted by Mr. T. D. Gibbons, of your office, December 15-18, 1981. As a result of this inspection Unresolved Item 81-60-01 was issued concerning the promptness of the reporting of Potentially Reportable Deficiency (PRD) No. 81/36.

In subsequent discussions with Mr. T. D. Gibbons and Mr. T. E. Conlon, of your office, we agreed to forward the chronology of events for review. Attachment "A" to this letter is the chronology relating to this item.

The correspondence referenced in Attachment "A" also references a second item which was evaluated for reportability during this same time frame. MP&L Engineering reevaluated this item when it came to our attention August 21, 1981, and concluded it did not meet the requirements for reporting. However, in our preparation and review of this chronological summary we have concluded that it would be prudent to provide a report for PRD 77/08 at this time. Our Final Report for this rebar deficiency is contained as Attachment "C" to this letter.

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The circumstances surrounding this issue are highly unusual and are not likely to re-occur. We would like to emphasize that the events had no adverse affects on quality. In each case all the requirements for Corrective Action as described in 10CFR50, Appendix B, Criteria XVI were accomplished.

MP&L has completed a review of Bechtel's MCAR 77 which provided a review of Bechtel MCARs issued prior to April 30, 1981, for improper rationale. Only the two items reported under our PRDs 77/08 and 81/36 were considered to have improper initial evaluation.

Yours truly,

For J. P. McGaughy, Jr.

TER:dr

ATTACHMENTS: A Chronological Summary
B Original PRD Form for 77/08
C Final Report for PRD 77/08

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

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

Mr. G. B. Taylor
South Miss. Electric Power Association
P. O. Box 1589
Hattiesburg, MS 39401

Background

The following is a chronology of events describing the evaluation and reporting of PRD-81/36 and PRD-77/08.

Date	Activity
July 25, 1977	MP&L was notified by Bechtel that 40 number 11 rebars were ommitted from the North and South walls of the main steam tunnel in the containment of Unit No. 1. Bechtel initiated Management Corrective Action Report (MCAR) No. 30; MP&L initiated Potentially Reportable Deficiency (PRD) No. 77/08.
July 26, 1977	T. E. Reaves of MP&L notified Mr. Bob McFarland, NRC Region II, of evaluation and non-reportability of PRD-77/08. Deficiency was not considered reportable under 10 CFR 50.55(e) in that repair of deficiency was not extensive. Cumulative cost to install rebar dowels for repair was aproximately $2,000.00. Reference Attachment "B" to this letter for documentation. It should be noted that while PRD-77/08 was not considered reportable under 10 CFR 50.55(e), all actions required by 10 CFR 50, Appendix B, (XVI), for significant conditions adverse to quality were accomplished and documented in Bechtel's MCAR 30.
November 30, 1977	Bechtel initiated MCAR 35, due to the ordering of incorrect supplemental steel sizes, W 8 x 17, instead of W 8 x 24, as required by drawing C-1415 A, from the Bechtel Fabrication Shop. The deficiency was evaluated by Bechtel as not reportable under 10 CFR 50.55(e) and, therefore, MP&L was not notified at this time. All actions required by 10 CFR 50, Appendix B, (XVI), significant conditions adverse to quality were accomplished and documented in Bechtel's MCAR 35.

Date	Activity
March 4-7, 1980	Mr. M. J. Gouge of Region II, NRC, conducted Inspection No. 80-02 at the Grand Gulf Job Site to evaluate 10 CFR 50.55(e) reporting procedures.
April 18, 1980	MP&L received letter AECM-80/80 which documented the results of Inspection 80-02.
April 30, 1980	Bechtel issued MCAR 77 to require re-evaluation of previous MCARs for improper rationale.
May 2, 1980	MP&L met in Region II NRC offices in Atlanta to discuss response to Inspection Report No. 80-02.
May 6, 1980	MP&L responded to Inspection report by letter AECM-80/93. Commitment was made to re-evaluate Bechtel's MCARs for improper rationale.
June 9, 1980	Bechtel issued letter MQBC-80/114, subject, "Final response to NRC Site Inspection Report No. 80/02." The Bechtel response was filed without proper review in that it was believed it contained only the information previously verbally received to support the NRC meeting and subsequent letter AECM-80/93. Even though the letter subject indicated only response to the NRC Inspection Report, the body contained a statement that MCARs 30 and 35 had been re-evaluated and were considered reportable.
August, 1981	MP&L was completing a review of our Potentially Reportability Deficiency Files to ensure that all items had been properly handled and that 10 CFR 21 had been considered where necessary. During this review, it was discovered that the information concerning MCARs 30 and 35 had not been properly considered. In that both items were 1977 occurrences and all actions were complete with the exception of reportability, they were considered as new information received by MP&L QA upon discovery. Our new methods of evaluating were utilized and MP&L Engineering was requested to evaluate the deficiencies.

Date	Activity
August 21, 1981	Issued PMI-81/2145 requesting the evaluation of MCARs 30 and 35 by MP&L Engineering. A time limit of fourteen (14) days was initiated for the evaluation, in that these items had not previously received an MP&L review.
September 3, 1981	MP&L Project Engineering issued PMI-81/2164 which evaluated MCAR No. 35 as being reportable and MCAR No. 30 as not reportable. QA issued PRD-81/36 and notified Mr. Hugh Dance of NRC at Region II, of the deficiency.
October 1, 1981	Letter AECM-81/376 was issued transmitting the final report for deficiency PRD-81/36.
February 18, 1982	In preparation and review of this chronological summary, MP&L determined that it would be prudent to provide a report for PRD-77/08 at this time. Our final report for this rebar deficiency is contained as Attachment "C" to this letter.

The circumstances surrounding this issue are highly unusual and are not likely to re-occur. The events have no adverse effects quality in that the hardware deficiencies were promptly identified and corrected.

MISSISSIPPI POWER & LIGHT COMPANY

NOTIFICATION OF POTENTIALLY REPORTABLE DEFICIENCY Report No. 77/08

I. Description of Deficiency

Detailed Description (Use attachments as required):

Forty (40) #11 rebar wall dowels were left out of wall pours on the outside walls of the steam tunnel between the drywell wall and the containment wall. A total of twenty (20) of these dowels should have been located on the north side of the north steam tunnel wall and twenty (20) on the south side of the south steam tunnel wall.
Reference Bechtel NCR No. 1941, Dwgs No. C-1044B Rev 7 and C-1049 Rev 7, and WP&IR No. Q1M22-W11166 W1B Rev. 1
MP&L notified by Bechtel of deficiency on July 25, 1977.

Reported By:	Organization:	Date:
T. E. Reaves, Jr. TER 7/26/77	MP&L QA	7/26/77

II. Evaluation of Reportability

	Reportable	Initial	Date
Manager of Quality Assurance	☐ Yes ☒ No	TER	7/26/77
Project Manager	☐ Yes ☒ No	JPM	7/27/77

Rationale for Decision:

Deficiency fails to meet the requirements of reporting under 50.55(e)(1)(iii) in that extensive evaluation, redesign and repair as defined by MP&L QAP 16.20 Rev. 0, Section IV, Item C requires the accumulative total of these items to be $50,000 or more. Bechtel has confirmed to J. P. McGaughy, Project Manager that accumulative total cost will approximate $2,000 dollars.

Reviewed by Vice-President of Production: TER 7/27/77
Initial Date

III. Notification of NRC by Telephone, Telegraph, etc.

Person Notified: Notified by Telephone, Telegraph, etc. Date:
Bob McFarland, NRC Region II, notified of evaluation and nonreportability of this deficiency July 26, 1977. TER 7/26/77

IV. Report to NRC

Report Due Date: Date Report Submitted: (Interim) (Final)
N/A

Cause of Deficiency:

Safety Implications:

Corrective Action Taken:

Note: Action to be tracked by Bechtel NCR#1941.

TER 7-26-77

Corrective Action Verified By: Date:

FINAL REPORT FOR PRD-77/08

I. Description of the Deficiency

Forty (40) #11 rebar wall dowels were left out of wall pours on the outside walls of the steam tunnel between the drywell wall and the containment wall. A total of twenty (20) of these dowels should have been located on the North Side of the North Steam Tunnel Wall and twenty (20) on the South Side of the South Steam Tunnel Wall in Containment Unit No. 1. These bars were to be the outside face vertical splice bars starting at elevation 163' 10".

II. Analysis of Safety Implications

The omission of the rebar dowels could possibly have had an adverse effect on safe operations of the plant had it gone uncorrected and, as such, could represent a significant deficiency in construction.

III. Corrective Actions Taken

A. A review of rebar installation was conducted. This resulted in the following:

1. The Quality Control Instruction pertaining to "Concrete Inspection Activities" was revised to include more detailed requirements and to provide for sign-off tracking of inspection activities.

2. A training session was given which covered unusual rebar details and associated problems. This session was presented to all Civil QC Engineers, Field Engineers, and Superintendents.

B. The specific deficiency was corrected by issuing revisions to the rebar installation detail drawing and by cadwelding # 11 hook dowels to the vertical # 11 wall bars from below.