

MISSISSIPPI POWER & LIGHT COMPANY Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

January 21, 1983

JAMES P. McGAUGHY, JR. AGSISTANT VICE PRESIDEN

> 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

Unit 1

License No. NPF-13 Docket No. 50-416 File 0260/15525/15526 I. E. Report No. 82/67, dated December 20, 1982

cus

•

AECM-83/436

Reference: MAEC-82/294, December 20, 1982

This letter provides our response to NRC Violations 416/82-67-01, 02, 03 and 05, transmitted by your letter dated December 20, 1982.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATIONS

Mississippi Power & Light Company admits to the violations as stated, with the exception of A.2 as noted below.

II. THE REASONS FOR THE VIOLATIONS IF ADMITTED

These violations resulted from inadequate programmatic controls of these activities which can be characterized as (1) inadequate technical review, (2) inadequate independent quality review, and/or (3) failure to review the final approved Technical Specifications against procedures which had been developed from earlier draft Tech Specs.

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

- Violation 416/82-67-01
 - Procedure 06-OP-1000-D-0001 will be revised to specify acceptance criteria.
 - This item does not constitute a violation due to the Tech Spec definition of "Channel Functional Test".

303010524 830216

A Channel Functional Test does not require verification of trip setpoint as does a Channel Calibration. Proper acceptance criteria (verification of trip function) was contained in the procedure. No action is planned on this item.

- 3. An FSAR change will be submitted to correct this discrepancy and a 10CFR50.59 review and/or evaluation will be performed on the design change.
- 4. An FSAR change will be submitted to correct this discrepancy and a 10CFR50.59 review and/or evaluation will be performed on the design change.
- 5. An FSAR change will be submitted to correct this discrepancy and a 10CFR50.59 review and/or evaluation will be performed on the design change.
- 6. Procedure 06-IC-1E61-M-1002 will be revised to incorporate the correct plant operational conditions.
- Procedure 06-OP-1000-D-0001 has been revised to correct this discrepancy.
- 8. Procedure 06-OP-1000-D-0001 has been revised to correct this discrepancy.
- Procedure 07-S-14-184 has been revised to correct this discrepancy.
- B. Violation 416/82-67-02

Procedure 06-0P-1000-D-0001 has been revised to correct these discrepancies.

C. Violation 410/82-67-03

MP&L will pursue with NRR a change to Technical Specifications to correct this discrepancy.

D. Violation 416/82-67-04

See AECM-83/435 dated January 21, 1983.

- E. Violation 416/82-67-05
 - Procedures will be developed to address the issue of verification of fuel pool cooling and cleanup system valve positions.
 - Procedure 06-OP-1000-D-0001 has been revised to require verification of valve positions.

 Procedure 06-OP-1E51-M-0001 will be revised to require verification of this valve's position.

IV. CORRECTIVE STEPS WHICH WILL TAKEN TO AVOID FURTHER VIOLATIONS

A Surveillance Review Program has been established to review and rewrite, if necessary, all surveillance procedures to ensure technical adequacy and compliance to Technical Specifications, the Final Safety Analysis Report, and applicable engineering design documentation. Surveillances found to have been inadequate due to inadequate procedures will be reperformed after procedure rewrite in order to establish Technical Specification operability requirements. MP&L will prepare and submit amendment requests to the NRC to correct any deficiencies found in Tech Specs as a result of this review.

Plant Administrative Procedure 01-S-06-12, "GGNS Surveillance Program", will be revised in order to establish a standard review criteria for surveillance procedures. Additionally, a program will be established to ensure that changes to the plant and licensing documentation are reviewed and incorporated into surveillance procedures in a timely manner.

V. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved prior to the next reactor criticality.

This response was due on January 19, 1983, but in a telephone conversation on January 18, 1983, Mr. D. M. Verelli of your office granted an extension until January 21, 1983.

Yours truly,

for J.P. Mc Garghy

LFD:jh

cc: Mr. N. L. Stampley

Mr. R. B. McGehee

Mr. T. B. Conner

Mr. G. B. Taylor

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