



## Mississippi State Department of Health

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Alton B. Cobb, M.D., M.P.H.  
State Health Officer

July 14, 1983

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station, Unit 1,  
Docket No. 50-416, License No. NPF-13,  
File 0260/L-860.0 - Comments on Changes  
to Grand Gulf Technical Specifications  
(NUREG 0926) Proposed by MP&L June 29, 1983

Based on our review of Grand Gulf Technical Specifications changes proposed by MP&L in their transmittal of June 29, 1983, we would like to submit the following comments for your consideration:

Item 6. (GGNS-697) change Number 2 of MP&L's referenced transmittal reads in part:

"The present requirement in Action Statement 71 on Table 3.3.7.1-1 to be in at least HOT SHUTDOWN within 12 hours with both of the required monitors inoperable was deleted because effluent monitoring is performed by Radwaste Ventilation monitoring system which is downstream of the Offgas system."

It is our understanding that gaseous effluent of the Offgas Treatment System is monitored at only two points prior to release to the atmosphere: (1) At the Offgas post-treatment monitoring point and (2) At the Radwaste Ventilation effluent monitoring point.

Review of NUREG 0926 shows present ACTION requirements on inoperability of the Noble Gas Activity Monitor of the Radwaste Ventilation monitoring system permit grab sampling at 8-hour intervals with analyses within 24 hours. This grab sampling may be used for a period of up to thirty (30) consecutive days. When this is considered, the resultant effect of the referenced change appears to allow several hours of release from the Offgas Treatment System to go unmonitored with respect to noble gas activity (if monitors at both points are inoperable).

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Mr. Harold R. Denton

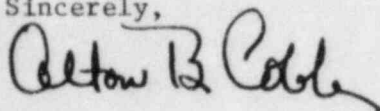
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We believe public health and safety margin considerations would be best served by requiring a noble gas activity monitor with alarm to be continuously operable at either the Offgas post-treatment or the Radwaste Ventilation point. We question whether the change is "purely administrative" and "does not involve any significant hazards considerations" as was stated by MP&L near the end of Item 6.

We have no other comments at this time.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alton B. Cobb". The signature is fluid and cursive, with the first name "Alton" being more prominent than the last name "Cobb".

Alton B. Cobb, M.D.

cc: Mr. Dean Houston (NRC)  
Mr. J. P. McGaughy (MP&L)