

February 13, 1984

DOCKETED

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 FEB 14 P3:16

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
 )  
MISSISSIPPI POWER & LIGHT )  
COMPANY, et al. )  
 )  
(Grand Gulf Nuclear Station, )  
Units 1 and 2) )

Docket Nos. 50-416  
50-417

SUPPLEMENT TO  
JACKSONIANS UNITED FOR LIVABLE ENERGY POLICIES'  
REQUEST FOR HEARING AND PETITION FOR LEAVE TO INTERVENE

Pursuant to an Order dated January 11, 1984 of the Atomic Safety and Licensing Board in the above-captioned proceeding, Petitioner Jacksonians United for Livable Energy Policies hereby submits the Supplement to its Request for Hearing and Petition for Leave to Intervene filed November 17, 1983, amended December 11, 1983. The contentions which Jacksonians United for Livable Energy Policies seeks to have admitted in this proceeding, to be considered at first prehearing conference set for February 29, 1984, are as follows:

JULEP 1: Petitioner contends that the Safety Evaluation on Amendment 10 to NPF-13, Grand Gulf Nuclear Station, Unit 1, unrealistically assumes perfect fuel.

The operators who installed the fuel currently in place had no significant experience in running this type of plant. Not a single member of the plant operating staff has previously held a commercial operator's license. (See Attachment No. 1.) The NRC has expressed concern that these operators may have been improperly certified, a problem now under investigation. (See Attachment No. 1.) This lack of experience and possible lack of satisfactory training and qualification make it much more likely that the cladding may have been damaged enough to affect safety criteria during insertion.

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JULEP 2: The safety evaluation of the High Pressure Cooling System (HPCS), based on the questionable assumption of perfect fuel, leaves a problematic gap in safety performance.

The HPCS activates only at intermediate and high pressure. Imperfect fuel could result in fuel performance failure at a lesser pressure at which the HPCS would not activate. This problem is particularly pertinent during the lower pressure of start-up and testing conditions. Such a failure could cause fuel damage and lead to a release of radiation. This would adversely affect the health and safety of JULEP member Dale Wallace, as well as many others in the area surrounding Grand Gulf. This measurable gap in safety should be addressed immediately.

JULEP 3: The safety evaluation of Amendment 10 in its entirety is unrealistically based on single failure criteria. That is, unless one thing by itself poses a danger to the public, the risk is not considered significant enough to address. This constitutes a serious shortcoming of the evaluation and may well render it an ineffective attempt to accurately ascertain safety hazards.

Consider, however, just a few of the thousands of incidents that have occurred at nuclear power plants across the country:

— The 1979 disaster at Three Mile Island resulted in part from the failure of a valve to open, a leak in the steam generator, and a leak in the rods.

— In 1970 Commonwealth Edison's Dresden 11 nuclear power plant in Morris, Illinois, released radioactive iodine into the containment vessel at 100 times the allowable concentration. The accident resulted from a false meter signal, a stuck monitor, and emergency core cooling system problems.

— In 1982 the Robert E. Ginna nuclear power plant released radiation after a pipe in the steam generator broke and a safety valve in the generator opened when it should have remained shut. During the seventies this same plant shut down several times due to a broken turbine block and numerous pipe leaks.

— In 1980 the Crystal River nuclear plant of the Florida Power Corporation shut down because of a loose electrical wire and a false signal.

It is clear that multiple failures occur frequently. This, in fact, is the source of many of the problems occurring in the industry. To refuse to consider the possibility of more than a single failure is to ignore reality and serious potential safety hazards.



Cynthia Ann Stewart  
Chairperson, JULEP

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NUCLEAR REGULATORY COMMISSION

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OFFICE OF THE SECRETARY  
DOCKETING SECTION  
Docket Nos. 50-416  
BRANCH 50-417

CERTIFICATE OF SERVICE

I hereby certify that copies of "SUPPLEMENT TO JACKSONIANS UNITED FOR LIVABLE ENERGY POLICIES' REQUEST FOR HEARING AND PETITION FOR LEAVE TO INTERVENE" in the above-captioned proceeding have been served on the following as indicated:

BY INDIVIDUAL ENVELOPE WITHIN FEDERAL EXPRESS PACKAGE SENT TO THE NUCLEAR REGULATORY COMMISSION, 1717 H Street, N.W., Washington, DC 20555:

Herbert Grossman, Chairman  
Administrative Judge  
Atomic Safety & Licensing Board Panel

Dr. James H. Carpenter  
Administrative Judge  
Atomic Safety & Licensing Board Panel

Dr. Peter A. Morris  
Administrative Judge  
Atomic Safety & Licensing Board Panel

Docketing & Service Section  
Office of the Secretary

Atomic Safety & Licensing Appeal  
Board Panel

N.R.C. Staff  
Mary E. Wagner, Counsel

BY HAND DELIVERY TO THEIR OFFICES, AS NOTED:

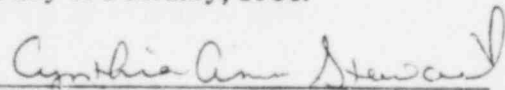
Mississippi Power & Light Company  
ATTN: J. P. McGaughy, Jr.  
Assistant Vice President, Nuclear Production  
Electric Building  
Jackson, Mississippi

Robert B. McGehee  
Wise, Carter, Child & Caraway  
925 Electric Building  
Jackson, Mississippi

BY FEDERAL EXPRESS PACKAGE SENT TO THEIR ADDRESS, AS NOTED:

Jessica H. Laverty  
Troy B. Conner, Jr.  
Robert M. Rader  
Conner and Wetterhahn, P.C.  
1747 Pennsylvania Avenue, N.W., Suite 1050  
Washington, DC 20555

The copies were all sent or delivered by me this 13th day of February, 1984.

  
Cynthia Ann Stewart  
Chairperson, JULEP



OFFICE OF THE  
COMMISSIONER

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

November 10, 1983

MEMORANDUM FOR THE COMMISSIONERS

SUBJECT: MISSISSIPPI POWER AND LIGHT'S  
GRAND GULF UNIT 1

On November 7, 1983, I visited Grand Gulf in the company of Jim O'Reilly and members of our staffs. The plant is the first BWR-6 with a Mark III containment in the United States.

I would like to share a number of observations with you:

1. The plant has been held down for the last year and a half by two basic problems. Design deficiencies in the drywell cooling system were identified during start-up testing. Extensive modifications were required and these took from October 1982 to June 1983. On October 20, 1982, Region II issued a Confirmation of Action letter (COA) that barred recriticality until serious deficiencies in the surveillance procedures and Technical Specifications were corrected. Licensee compliance with this COA was completed in September, 1983. The plant start-up program has been further delayed by a recent fire in a diesel generator room.

Not yet resolved are newly discovered problems with the documentation of operator training qualifications. It appears operators may have been improperly certified. Region II and OI are currently investigating. The licensee has committed to requalifying, if necessary, or recertifying the operators. MP&L estimates that the retraining will be completed and ready for Region II review approximately one month after the plant returns to cold shutdown. Jim O'Reilly estimated that the Region II review would take about a month, assuming things went well.

2. Grand Gulf has received two consecutive low SALP ratings in Plant Operations and Operational Preparation, and in Preoperational and Surveillance Testing. These are the most important areas. The next SALP, which was due to be started in August, has been postponed. I believe the Commission should have an update on these ratings before any licensing decision.

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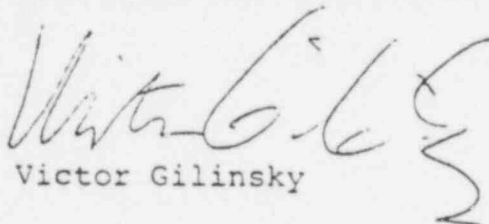


3. Not a single member of the plant operating staff has previously held a commercial operator's license. MP&L has hired temporary "advisors" with shift operating experience, as a way of plugging the experience gap. The difficulty I see with this is that the advisors with experience have no direct responsibilities; and the licensed shift supervisors with responsibility have no experience.

The advisors are under contract to stay until the plant reaches full power. I expect they will leave after that. Not having had to go through a rigorous licensing process for this plant, it is unclear what they know of the plant specific details, both hardware and administrative controls. Being temporary employees, they don't have a strong incentive to master these details.

I believe that the Commission should establish minimum experience levels for each shift at Grand Gulf which would be required before full power license approval. Specifically, there should be an experienced shift supervisor on each shift. I would give the utility the option to qualify the current advisors for this role by having them obtain an SRO license for Grand Gulf. The staff should be prepared to give license examinations to the current advisors.

4. A general observation: NRC's approval of the advisor approach to dealing with the lack of experienced operators has resulted in the establishment of "body shops" for formerly licensed operators. These body shops pay much higher salaries than utilities such as MP&L and LILCO for the operators who might be interested in changing jobs. We are in effect encouraging experienced operators to become transients by creating jobs which offer them more money with less responsibility and less effort. If we insisted on some number of permanent experienced operators at new plants, we would put the body shops out of business, and we would free up a pool of experienced operators for utilities.

  
Victor Gilinsky

cc: SECY  
OGC  
OPE  
EDO