

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

MAY 1 0 1984

file by

MEMORANDUM FOR: Chariman Palladino Commissioner Gilinsky Commissioner Roberts Commissioner Asselstine Commissioner Bernthal

FROM: William J. Dircks Executive Director for Operations

SUBJECT: GRAND GULF RESTART DECISION

In a memorandum dated May 3, 1984, Commissioner Gilinsky requested copies of certain staff documents related to Grand Gulf. Commissioner Gilinsky's first request was for "sign-off by the licensing staff" that the Technical Specifications in Grand Gulf license are currently correct and completely conform to the as-built plant. The staff has not yet reached a decision concerning the correctness or conformance of the technical specifications for operation beyond the current licensed power level of 5%. The support for the decision to permit operation within the current license at Grand Gulf was provided with the Order Restricting Condition for Operation that was issued April 18, 1984. A concurrence copy of the Order is provided for your information. In addition, Region II performed two inspections which relate to the conformance of the Technical Specifications to the as-built plant. A copy of the concurrence pages for these inspection reports will be provided in the next few days.

Commissioner Gilinsky's second request was for the staff sign-offs that the plant Final Safety Analysis Report has been revalidated as conforming to the as-built plant. In general, the Region's inspection program, which is based on a sampling methodology, serves as a basis for establishing sufficient assurance that the as-built plant conforms to the FSAR. Eight inspection reports in addition to those previously mentioned relate to FSAR conformance. Concurrence copies of these reports are attached. Additionally, we have attached two internal NRR documents that speak to the staff's conclusions regarding the consistency of the FSAR with the as-built plant for operation within the restrictions of the current 5% license, a memorandum from R. Mattson to D. Eisenhut dated April 18, 1984, and a note to T. Novak from R. Vollmer dated April 18, 1984. The staff reviewed those inconsistencies identified by the licensee and concluded that none were of a nature to preclude issuing the Order Restricting Conditions for Operation.

Documents which respond to the third request regarding licensed operators and plant advisors are on file in the Region II office. They will be provided in the next few days.

Contact: DHouston, NRR X28358

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Commissioners

The fourth item requests staff sign-offs that outstanding investigations have been adequately resolved for starting up the plant. Neither the Region nor NRR were or are aware of any information on outstanding investigations that should preclude authorization of plant start up. Although staff sign-offs are not used for this purpose, this issue was considered by both the Region and NRR management in their decision to permit plant startup.

In response to item 5, the most complete and comprehensive NRC documentation of the causes for the technical specification errors and the surveillance procedure errors are the responses from Mr. Dircks to Commissioner Gilinsky's previous inquiries on these subjects. Memos of January 13, February 28, and February 29, 1984, respond to the questions of December 13, 1983, from Commissioner Gilinsky regarding the nature and causes of the Technical Specification errors. Mr. Dircks' memoranda of March 8 and March 15, 1984, responded to the nature and cause of surveillance procedure errors, as requested by Commissioner Gilinsky's memo of March 2, 1984.

The NRC staff is currently working with MP&L to review all required changes and corrections to the Technical Specifications for full power operation. The next license amendment will include all of these required changes to the Technical Specifications. The NRC staff approval when issued with a supporting safety evaluation will provide documentation that all necessary Technical Specifications have been corrected.

Regarding surveillance procedure errors, in response to the NRC Region II Confirmation of Action letter of October 20, 1982, MP&L performed a complete review, rewrite, and reapproval of the Grand Gulf surveillance procedures. Revised procedures were designated as Revision 20 to distinguish them from older versions. NRC Region II conducted an operational readiness inspection on August 15 through September 1, 1983, prior to recriticality. One facet of that inspection was evaluation of the adequacy of the Revision 20 surveillance procedures. That inspection is documented as Region II inspection report 50/416/83-38. A copy will be provided in the next few days.

Commissioner Gilinsky's sixth request related to the staff sign-off that the emergency diesel power supplies are fully qualified for plant operation. At this time, the staff has not concluded that the emergency diesels are sufficiently qualified to support operation above 5 percent power. However,

the staff did find that total failure of the Delaval diesels at Grand Gulf would not significantly increase the risk of low-power operation and that the risk of low-power operation is acceptably small. We have attached a copy of that evaluation for your information (memo from R. Mattson to D. Eisenhut dated April 12, 1984.).

(Signed) William J. Dircks

William J. Dircks Executive Director for Operations

Enclosures: 1. 4/18/84 Order 2. Inspection Reports (8) 3. R. Mattson Memo, 4/18/84 4. R. Vollmer Note, 4/18/84 5. R. Mattson Memo, 4/12/84

cc w/enclosures: OPE OGC SECY

DISTRIBUTION: See attached page

*See previous concurrences

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Commissioners

that total failure of the Delaval diesels at Grand Gulf would not significantly increase the risk of low-power operation and that the risk of low-power operation is acceptably small. We have attached a copy of that evaluation for your use (memo from R. Mattson to D. Eisenhut dated April 12, 1984.).

William J. Dircks Executive Director for Operations Enclosures: 1. 4/18/84 Order 2. Inspection Reports (8) 3. R. Mattson Memo, 4/18/84 4. R. Vollmer Note, 4/18/84 5. R. Mattson Memo, 4/12/84 cc w/enclosures: OPE OGC SECY DISTRIBUTION: See attached page 2321 OELD CHS 30 St AD/L/DL LB#4/DL EDO 18#47DL NRR ODEisenhut Case/Denton WDircks EGAdensam TNovak DHouston:dh 05/8/84 05/8/84 05/9 /84 05/ /84 05/ /84 05/ /84 05/8/84

DISTRIBUTION: EDO (GREEN) TICKET #14404 - GRAND GULF RESTART DECISION)

Document Control (50-461) w/original incoming NRC PDR w/incoming LPDR w/incoming EDO #14404 (w/orig. green ticket)* EDO Rdg. File* W. J. Dircks* E. Case/H. Denton* LB#4 Rdg. File* E. Adensam* M. Duncan* D. Houston* D. Eisenhut/M. Jambor* M. Wagner, OELD* T. Novak/P. O'Brien* K. Bowman, P-428, GT #14404* J. Roe* T. Rehm*
V. Stello* J. O'Reilly* G. Cunningham* Hayes, OI*

* w/o enclosures

ENCLOSURE 1

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

MISSISSIPPI POWER & LIGHT COMPANY MIDDLE SOUTH ENERGY, INC., AND SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION (Grand Gulf Nuclear Station) Docket No. 50-416

ORDER RESTRICTING CONDITIONS FOR OPERATION (EFFECTIVE IMMEDIATELY)

Ι.

Mississippi Power & Light Company (MP&L), Middle South Energy, Inc., and South Mississippi Electric Power Association (the licensees) are the holders of Facility Operating License No. NPF-13, which authorizes the operation of the Grand Gulf Nuclear Station, Unit i (the facility) at steady state reactor power levels not in excess of 191 megawatts thermal. The facility consists of a boiling water reactor (BWR/6) with a Mark III containment located in Claiborne County, Mississippi.

II.

On June 16, 1982, a low power license was issued for the Grand Gulf Nuclear Station, Unit 1. Inspections by Region II in regard to compliance of surveillance procedures with the Technical Specifications were performed from June 16, 1982, to October 8, 1982, and discrepancies in the surveillance procedures and Technical Specifications were identified. Based on these inspections, a Confirmation of Action (COA) letter was issued to restrict the next criticality (plant then in shutdown for other reasons) until the identified discrepancies were resolved. At the conclusion of this phase of MP&L's review, in late August 1983, another inspection was held to discuss the reasons for the discrepancies and to determine whether changes required for operation through the first fuel cycle had been submitted. The plant returned to criticality on September 25, 1983, and low power tests were conducted until November 8, 1983. The plant was shut down after testing and remained shutdown while undertaking an extensive licensed operator recertification program (another problem identified by Region II in early November 1983). During this shutdown, MP&L and the staff reviewed again the Technical Specifications as issued through Amendment No. 12 to the Operating License. Again, each review party found further problem areas, thus necessitating a complete, high quality review of the Technical Specifications by MP&L. A review program was initiated by MP&L on March 2, 1984, which involved approximately 150 personnel from MP&L, General Electric and Bechtel. From previous reviews and inspections and the program reviews, approximately 350 Technical Specification problem areas were identified.

III.

As a result of the above reviews and inspections, it was found that certain Technical Specifications are (1) inconsistent with the as-built plant and may thereby create unnecessary confusion to the plant operating staff or otherwise increase the risk of human error, and/or (2) inconsistent with the safety analyses associated with the basis for the plant design such that compliance with those Technical Specifications would permit operation under unanalyzed conditions with reduced margins of safety.

Consequently, the uncertainties raised by these inconsistencies require changes to the Technical Specifications to prevent the potential for undue

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risk to the public from operation of the facility up to power levels currently authorized. While all of the problems with the Technical Specifications will need to be resolved, operation at a power level of up to 5% does not require all such problems to be resolved at this time. A safety evaluation is attached as Attachment 1 which describes the changes required for 5% power operation and the reasons for each change. Therefore, I have determined that the public health, safety and interest require that, effective immediately, the licensees' current authorization under the license be restricted in accordance with this Order.

IV.

Accordingly, pursuant to sections 103, 161i, 161o, 182 and 186 of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, it is hereby ordered, effective immediately, that:

> MP&L shall not operate the Grand Gulf plant under the terms of License No. NPF-13 unless such operation is in conformance with the revised Technical Specifications appended to this Order and MP&L, prior to entry into mode 2, certifies to the Regional Administrator, Region II, that MP&L's procedures have been modified and training conducted to reflect the revised Technical Specifications.

٧.

Within 20 days of the date of this Order, the licensees may show cause why the actions described in Section IV should not have been ordered by filing a

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written answer under oath or affirmation that sets forth the matters of fact and law on which the licensees rely. As provided in 10 CFR 2.202(d), the licensees may answer by consenting to the Order set forth in Section IV of this Order to show cause. Alternatively, the licensees may request a hearing on this Order. Any request for a hearing on this Order or answer to the Order must be filed within 20 days of the date of this Order with the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy of the request shall also be sert to the Executive Legal Director at the same address. A request for a hearing shall not stay the immediate effectiveness of Section IV of this Order.

If the licensees request a hearing on this Order, the Commission will issue an order designating the time and place of hearing. If a hearing is held, the issue to be considered at such a hearing shall be whether the Order should be sustained.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by H. R. Denton

Harold R. Denton, Director Office of Nuclear Reactor Regulation

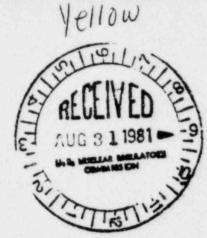
Attachments: Safety Evaluation (1)Revised Technical Specifications (2) ed on The Dated at Bethesda, Maryland this 18 day of April 1984 OELD D:DSI RMattson RVollmer anut Der densam 1/84 4/ /84 4/ /84 4/ /84 0/84

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ENCLOSURE 2

JUL 3 1 1991

Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205



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Gentlemen:

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Subject: Report No. 50-416/81-25

This refers to the routine safety inspection conducted by Mr. P. A. Taylor and G. L. Paulk of this office on June 25-26, July 6-10 and July 13-17, 1981, of activities authorized by NRC Construction Permit No. CPPR-116 for the Grand Gulf facility and to the discussion of our findings held with Mr. C. K. McCoy, Plant Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Within the scope of this inspection, no violations or deviations were disclosed.

One new unresolved item resulted from this inspection and is discussed in the enclosed report. This item will be examined during subsequent inspections.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed report will be placed in the NRC's Public Document Room. If the report contains any information that you believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you: (a) notify this office by telephone within ten days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with section 2.790(b)(1), such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part thereof sought to be withheld, and a full statement of the reasons on the basis of which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

79

R. C. Lewis, Director Division of Resident and Reactor Project Inspection

Enclosure: Inspection Report No. 50-416/81-25

cc w/encl: C. K. McCoy, Plant Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Mississippi

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UNITED STATES NUCLEAR REGULATORY COMMISSION REGION !I 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

Report No. 50-416/81-25

Licensee: Mississippi Power & Light Company Jackson, MI 39205

Facility Name: Grand Gulf Nuclear Station

Docket No. 50-416

License No. CPPR-118

Inspection at Grand Gulf Nuclear Station near Port Gibson, Mississippi

Inspectors: Q. Q. Taylor P. A. Taylor	7-31-81
	Date Signed
Q. a. Taylor lor	7-31-81
G. L. Paudk	Date Signed
Approved by: C. Canter for F. S. Cantell, Section Chief, Division of	7-51-81
F. S. Cantrell, Section Chief, Division of	Date Signed

Resident and Reactor Project Inspection

SUMMARY

Inspection on June 25-26 - July 6-10, and July 13-17, 1981

Areas Inspected

This routine unannounced inspection involved 59 inspector-hours on site in the areas of nonroutine event review, operational staffing and comparison of as built plant systems to FSAR requirements.

Results

Of the three areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

Licensee Employees

- *C. K. McCoy, Plant Manager
- *C. L. Stuart, Assistant Plant Manager
- *G. B. Rogers, Site Manager
- *C. R. Hutchinson, Startup Manager *J. W. Yelverton, QA Supervisor
- *R. R. Weedon, Chemistry & Radiation Control Superintendent
- *J. C. Bell, QA Auditor
- *S. F. Tanner, QA Coordinator
- R. Moomaw, Instrumentation Supervisor
- R. A. Ambrosino. Nuclear Support Manager

Other licensee employees contacted included construction craftsmen, technicians, and engineering personnel.

Other Organizations

- M. L. Rayfield, Bechtel Staff
- *P. S. Collins, QA Engineering Bechtel
- *L. E. Blakeslee, Field Engineer Bechtel
- *R. W. Frayer, Checkout & Turnover Bechtel
- L. Eichenberger, Startup Engineer General Electric
- C. G. Rankin, Bechtel Staff

*Attended exit interview

2. Exit Interview

> The inspection scope and findings were summarized on July 10, 1981 and July 17, 1981 with those persons indicated in Paragraph 1 above. The licensee was informed of one unresolved item identified during the inspection, paragraph 7.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

> Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. New unresolved items identified during this inspection are discussed in paragraph 7.

5. Nonroutine Event Review

This area was reviewed to verify that responsibilities have been assigned for the review of nonroutine events, that reporting of these events internally and to the NRC have been established. In addition the inspector reviewed procedure to ensure that methods have been established which provides for corrective action to be taken and the completion of the corrective actions. The inspector review the below listed procedure which implements the reporting and the handling of nonroutine events.

01-5-06-8, Plant Staff Handling of Plant Licensing Activities 01-5-06-9, Plant Reporting Requirements to Outside Agencies 01-5-06-5, Reportable Events 01-5-01-5, Reportable Occurrences

Within the areas inspected no violations or deviations were identified.

6. Operational Staffing

This area was reviewed to ascertain that operating staff positions are filled and that staff qualifications meet the requirements of ANSI 18.1-1971, and ANSI 3.1-1979. The licensee has committed to these standard as noted in the FSAR and the QA Topical Report. The inspected reviewed the qualification of the Reactor Engineer, I&C Superintendent, Technicians, Electricians, QA Supervisor QA auditors, QC inspectors and unlicensed Operators.

Within the areas inspected no violations or deviation were identified.

7. Comparison of As-Built Plant to FSAR Description

The inspector reviewed the as-built plant configuration to ensure conformity to commitments contained in the FSAR concerning the High Pressure Core Spray System. The inspector verified mechanical and fluid system physical installations to check agreement with the FSAR P&ID's. It was noted that current FSAR changes for the High Pressure Core Spray System stop at revision 9 (Fig. 6.3.1 in FSAR). The as-built drawings are current through revision 15. (M1086/15). The inspector attempted to review the design changes made to the High Pressure Core Spray System as required by 10 CFR Part 50 Appendix B Criterion III. No review records were available on site although the inspector was told that the necessary documentation on system design changes were maintained at the Bechtel vendor offices in Maryland. Changes have not currently been submitted to NRR by the licensee to update the FSAR. 10 CFR 50.55(d) requires, in part, that "At or about the time of completion of the construction ... of the facility, the applicant will file any additional information needed to bering the original application for license up to date ... " This item will remain an unresolved item. (416/81 25-01)

A review of the control and logic instrumention by the inspector revealed that table 7.3.-2 of the FSAR on High Pressure Core Spray System, Instrument

Specifications, lists a specification for a turbine and discussion referenced in note 3. The inspector was unable to locate a turbine associated with the High Pressure Core Spray System and was told by the plant staff that this was an apparent error in the FSAR. This will be an open item (416/81-25-02).

The inspector checked the P&ID's for operational usage and noted that all plant P&ID's are generic in one area; all test connections and gage/instrument root valves less than 2 inch are not shown on the P&ID's. The shift supervisors and plant staff interviewed expressed concern over the uncertainty involved in tagging out systems. A computer printout valve sort index is available to the shift supervisors which lists all plant systems and their valves, however no one print is available that lists all of a system's valves. Layout drawings do exist in the engineering section (FSK, J,) which lists all of a system's valves; however, these drawings are not currently used for pre-operational purposes. This item will remain an inspector followup item. (416/81-25-03).

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Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205

Gentlemen:

Subject: Report Nos 50-416/82-01 and 50-417/82-01

This refers to the routine safety inspection conducted by Mr. J. J. Blake of this office on January 4-7, 1982, of activities authorized by NRC Construction Permit Nos. CPPR-118 and CPPR-119 for the Grand Gulf facility and to the discussion of our findings held with Mr. G. B. Rogers, Jr., Site Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection; no violations or deviations were disclosed.

We have examined actions you have taken with regard to previously identified enforcement matters and unresolved items. The status of these items is discussed in the enclosed report.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

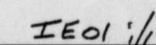
Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

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R. C. Lewis, Director Division of Resident and Reactor Project Inspection

Enclosure: See Page 2



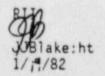
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Mississippi Power and Light Company

Enclosure: Inspection Report Nos. 50-416/82-01 and 50-417/82-01

cc w/encl: D. C. Gibbs, Vice President Middle South Energy, Inc. C. K. McCoy, Plant Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Mississippi



ARHerdt 1/92/82

RII CEMurphy 1/22/82

RN JAOISDINSKI HARd 1/ 182

1/26/82

RCLewis 1/1/82



UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

Report Nos. 50-416/82-01 and 50-417/82-01

Licensee: Mississippi Power and Light Company Jackson, MS 39205

Facility Name: Grand Gulf 1 and 2

Docket Nos. 50-416 and 50-417

License Nos. CPPR-118 and CPPR-119

Inspection at Grand Gulf site near Port Gibson, MS

Inspector:

Approved by!

A. R. Herdt, Section Chief Engineering Inspection Branch Engineering and Technical Inspection Division

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Date Signed

SUMMARY

Inspection on January 4-7, 1982

Areas Inspected

This routine unannounced inspection involved 24 inspector-hours onsite in the areas of Licensee Action on Previous Inspection Findings; Licensee Identified Items; Structural Integrity Test Results; Review of As-Builts.

Results

Of the four areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*G. B. Rogers, Jr., Site Manager

J. W. Yelverton, QA Supervisor

*S. F. Tanner, QA Coordinator

D. D. Little, QA Representative

J. Kelley, QA Representative

S. Pruitt, ISI Coordinator

Other Organizations

R. Scharman, Bechtel, Supervisor, Civil Engineering, Small Pipe Hanger C. O'Neil, Bechtel, Resident Engineer, Light Structures

NRC Resident Inspector

A. Wagner, Senior Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on January 7, 1982, with those persons indicated in paragraph 1 above. The action taken on previous inspection findings and licensee identified items which were reviewed and closed this inspection were discussed with the licensee.

3. Licensee Action on Previous Inspection Findings

- a. (Open) Violation (50-416/81-20-02) Inadequate Inspection Activities. The licensee is still in the process of providing assurance that final inspections of items with locking tabs will be conducted prior to operation of the equipment involved. There is also the question of whether the tab must always be bent along one flat of a nut or whether it can be bent over a corner to contact two flats. This item will be reviewed again on another inspection.
- b. (Closed) Unresolved Item (50-416/81-11-03) Visual Examination of Pressure Retaining Bolting For Preservice Examination is Questionable. The licensee has identified which pumps, valves, and flanges contain pressure retaining bolting subject to the preservice and inservice examinations of ASME Section XI. A review of vendor and fabricator records has provided certification that the bolting materials involved have been nondestructively examined at some point in the history of the part involved.

- c. (Closed) Unresolved Item (50-416/81-40-01; 50-417/81-17-01) UT Weld Volume Coverage When Performing Full Vee-Path Examinations. The PSI/ISI contractor has changed the calibration procedure to clarify the requirements for 12/8 THS V-Path calibration. The procedure change has been approved by the licensee's ISI coordinator.
- d. (Closed) Unresolved Item (50-416/81-40-02; 50-417/81-17-02) Qualification of Ultrasonic Indications as Geometric Reflectors. The licensee and PSI/ISI contractor have reviewed the fabrication records (including radiographs) for all welds which were suspected of having geometric indications. The procedure for evaluation of UT indications has been clarified to require this type of review.
- 4. Unresolved Items

Unresolved items were not identified during this inspection.

- 5. Independent Inspection
 - a. The inspector conducted a walk-through inspection of the Units 1 and 2 auxiliary buildings to observe housekeeping and protection of installed safety related equipment. Unit 1 appeared to be moving steadily toward operational status with construction equipment and debris being removed and areas being cleaned and painted in preparation for turnover. The Unit 2 areas show the normal weathering that is to be expected for a project which has been delayed as long as it has. Most areas will require special clean-up and evaluation prior to renewing the construction of this unit.

There were no violations or deviations in this area of the inspection.

Structural Integrity Test (Unit 1)

The inspector attended a meeting between the licensee and representatives of the structural integrity test (SIT) contractor. This meeting was to present the preliminary results of the SIT and the integrated leak rate test.

The results were presented in an informal basis in that the contractor asked for a post-test calibration check of the extensometers used during the test. The final report will be prepared after this calibration check and the final review of all data.

There were no violations or deviations in this area of the inspection.

6. Licensee Identified Items

The inspector reviewed the licensee's final report and supporting documentation for the following licensee identified items.

- a. (Closed) (50-416/80-12-06) Pipe Hangers Not Installed in Accordance With Specifications (PRD-80/09). The final report for this item was forwarded by Mississippi Power and Light Company (MP&L) letter No. AECM-81/374 dated September 30, 1981. The inspector reviewed the final report and supporting documentation. There are no further questions at this time.
- b. (Open) (50-416/80-23-11) Installation of HVAC Hangers (PRD-80/54). The licensee forwarded the final report for this item via letter No. AECM-81/185 dated May 28, 1981. A review of the supporting documentation showed that three nonconformance reports (NCR 5156, 5157 and 5158) (representing a large number of hangers to be reinspected and repaired if necessary) are still open. The inspector was informed that the work on the outstanding NCR's was expected to be finished by the end of January.
- c. (Closed) (50-416/80-20-06; 50-417/80-13-06) Procedural Violation in Cutting of Reinforcing Bar (PRD-80/30). The final report on this item was forwarded by MP&L No. AECM-81/480 dated December 8, 1981. The inspector reviewed this report and supporting documentation and had no further questions at this time.
- d. (Closed) (50-416/82-01-01) Mounting Tab and Fusible Link Fire Damper Deficiency (PRD-81/05).- The inspector reviewed MP&L letter No. AECM-81/420 dated October 27, 1981. This report along with the supporting documentation provided evidence that the problem had been fully identified and corrected. There are no further questions at this time.
- e. (Closed) (50-416/82-01-02) Non-Qualified HVAC Systems (PRD-81/22). The inspector reviewed the licensee's final report which was forwarded by MP&L letter No. AECM-81/265 dated August 14, 1981, which identified the problem and the corrective action to be taken. At the time of this inspection the supporting documentation showed that the design changes have been completed and the specification and plan changes issued. There are no further questions at this time.
- f. (Closed) (50-416/82-01-03; 50-417/82-01-03) Seitz Solenoid Valves for Dikkers Safety Relief Valves (PRD-81/33). The inspector reviewed the licensee's final report forwarded by MP&L letter No. AECM-81/496 dated December 15, 1981. This report fully identified the solenoid valve problem as a factory assembly problem which is readily detectable and fully correctiable by proper assembly precautions. There are no further questions at this time.
- g. (Closed) (50-416/82-01-04) Acid Damage to SSW Basin "B" Pump (PRD-81/15). The licensee forwarded the final report on this time by letter No. AECM-81/519 dated December 31, 1981. The inspector reviewed

the final report and the supporting documentation for the determination of the cause, and the extent, of the problem. The documentation showed that the damage has been repaired and actions taken to preclude recurrence.

7. Inspector Followup Items

The inspector reviewed the following inspector concerns which had been identified in previous inspection reports:

- a. (Closed) (50-416/81-14-01) HPCS Vessel Inspection Test Connection Failure. The licensee determined that this item was not reportable per 10 CFR 50.55(e) as explained in the MP&L letter No. 81/430 dated October 29, 1981. But, to remain conservative the Bechtel Specification 9645-M-275.0, Preoperation Piping Vibration, Thermal Monitoring and Dynamic Effects Testing of Piping Systems, was revised to include vibration testing requirements for all ECCS test connections.
- b. (Closed) (50-416/81-27-01; 50-417/81-11-01) MSRV Quencher Weld Size. All of the welds in question on both Units 1 and 2 MSRV quenchers have been measured and analyzed. Project Engineering has concluded that all welds were acceptable as is.

There were no violations or deviations identified in this area of the inspection.

8. Review of As-Builts

The inspector reviewed a portion of the licensee's program for providing as-built verification of piping and structures. In the area of structures, the following procedures were reviewed:

WP/P-5	Change Request/Notice
WP/P-10	Field Detail Design
WP/P-J-2 WP/P-P-5 WP/P-P-10	Field Design Change (Redline) Procedure Large Pipe Hanger and Small Pipe Hanger Field Design Change (Redline) Procedure for Pipe Hangers, Supports, Guides and Anchors

In the area of ASME code piping the following procedures were reviewed:

Quality Control Instruction 1302T - ASME Code Stamping Activities Quality Control Instruction 1303T - ASME Code Stamp Review and Data Packaging The following three piping runs were selected for comparison with the latest drawing revision.

Dwg. FSK-S-1087-001-B Rev. 13 - LPCS Jockey Pump Bypass Flow Dwg. FSK-S-1091-015-B Rev. 7 - Sample Line From Drywell to Drywell Hydrogen Analyzer Dwg. FSK-S-1087-003-B Rev. 6 - LPCS Jockey Pump C002-A Discharge

There were no violations or deviations resulting from this area of the inspection.

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Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205

Gentlemen:

Subject: Report No. 50-416/82-04

This refers to the routine safety inspection conducted by Mr. A. G. Wagner of this office on December 16, 1981 - January 11, 1982, of activities authorized by NRC Construction Permit No. CPPR-118 for the Grand Gulf facility and to the discussion of our findings held with Mr. C. K. McCoy, Plant Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no violations or deviations were disclosed.

We have examined actions you have taken with regard to previously identified enforcement matters and unresolved items. The status of these items is discussed in the enclosed report.

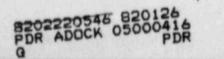
In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

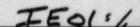
Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

F. S. Cantrell, Acting Chief Reactor Projects Branch 1, Division of Resident and Reactor Project Inspection

Enclosure: See page 2





Mississippi Power and Light Company 2

Enclosure: Inspection Report No. 50-416/82-04

cc w/encl: D. C. Gibbs, Vice President Middle South Energy, Inc. C. K. McCoy, Plant Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Mississippi

RII:RRPI Avagner:gr 1/25/82



RII:RRPI AKHardan 1/25/82





UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

Report No. 50-416/82-04

Licensee: Mississippi Power and Light Company Jackson, Mississippi

andi

Facility Name: Grand Gulf

G

Docket No. 50-416

License No. CPPR-118

Inspector:

Approved by:_

tardu

Austin Hardin, Acting Section Chief, Division of

Resident and Reactor Project Inspection

1/25 Date

SUMMARY

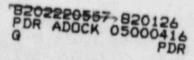
Inspection on December 16, 1981 - January 11, 1982

Areas Inspected

This routine announced inspection involved 50 inspector-hours on site in the areas of followup of previous enforcement and unresolved items, preoperational test supervisor qualifications and plant tour.

Results

Of the 3 areas inspected, no items of noncompliance or deviations were identified.



DETAILS

1. Persons Contacted

Licensee Employees

- *C. K. McCoy, Plant Manager
- *T. H. Cloninger, Assistant Site Manager
- *C. R. Hutchinson, Startup Manager
- *J. W. Yelverton, Quality Assurance Supervisor
- *J. C. Roberts, Startup Manager
- *L. F. Daughtery, Plant Quality
- *M. A. Lacey, Quality Assurance Engineer
- *J. C. Bell, Quality Assurance Engineer
- D. Webster, Licensing Engineer
- G. Lee, Training Supervisor

General Electric M. G. Farschon, Site Operations Manager

- *Attended exit interview
- 2. Exit Interview

The inspection scope and findings were summarized on January 11, 1982 with those persons indicated in paragraph 1 above. The licensee had no comments regarding the inspection findings.

3. Licensee Action on Previous Inspection Findings

(Closed) Violation (416/81-31-01) Failure to follow procedures MP&L letter No. AECM 81/378 dated October 2, 1981, has been reviewed and determined to be acceptable by Region II. The revised administrative procedure 01-5-04-4 was reviewed to verify the minimum acceptable examination score was corrected. The training information notices issued to all personnel previously attending General Employee Training were reviewed to assure that all omitted topics were included. There are no further questions concerning this item. This item is closed.

(Closed) Violation (416/81-22-02) Inadequate QA training. Another audit was conducted of QA indoctrination status maintained by station section supervisors. The audit revealed that the status is being maintained as described MP&L letter AECM 81/280 dated August 4, 1981. Plant Quality and Field Quality Assurance have conducted reviews of the QA training included in General employee Training. They are in agreement that the lesson plans includes all required QA training. The inspector reviewed the lesson plan for the QA portion of general employee training to ensure previously identified weak areas were discussed. There are no further questions. This item is closed. (Open) Unresolved Item (416/81-10-14) The inspector reviewed the status of this item. The FSAR section 9.3.5.3.2 has not been updated to reflect the enclosure status of the Standby Liquid Control system. This item remains open.

(Open) Unresolved Item (416/81-13-01 and 416/81-13-02) The instrument air preoperational test has not been revised to reflect the requirements for vibration monitoring as described in the FSAR paragraph 14.2.12.1.59. 6.1 (b)(3) and the testing requirements contained in Regulatory Guide 1.80, June 1974, paragraph c.5, C.6 and C.7. This item remains open.

(Open) Unresolved Item (416/81-15-04) The inspector reviewed the status of this item. The licensee has utilized additional training services of the Nuclear Steam Supplier to answer or resolve questions pertaining to plant transient analysis. The licensee has not however determined the need to revise the FSAR to provide plant specific transient analysis curves. There does not exist a formal feedback method for correction of FSAR errors. This item remains open.

(Open) Unresolved Item (416/81-22-03) The inspector reviewed the status of this item. No action has been taken by the licensee concerning this item. This item remains open.

(Closed) Unresolved Item (416/81-25-01) The licensee has provided updated copies of plant system P&ID's in Amendment 52 of the Final Safety Analysis Report. An installation verification will be performed using the revised P&ID's as required by the NRC Inspection Program. Additional identified discrepancies will be documented by seperate report. There are no further questions. This item is closed.

(Closed) Unresolved Item (416/81-32-04) The inspector reviewed the revised procedure 01-5-02-02. The revision incorporated the requirements for System Operating Instructions, Alarm Response Instructions, Maintenance Procedures (Safety Related) and Radiation Procedures as will be required by implementation of the proposed technical specifications. There are no further questions. This item is closed.

Unresolved Items

Unresolved items were not identified during this inspection.

5. IE Bulletins

The inspector reviewed the status of the following IE Bulletins.

a. (Closed) IE Bulletin 80-17, "Failure of 76 of 185 control rods to fully insert during a scram at a BWR." This bulletin was sent to the licensee for information only. The NRC conducted a generic study and sent to Mississippi Power & Light Company the Generic Safety Evaluation Report, BWR Scram Discharge System dated December 1, 1980. Mississippi Power and Light Company responded to an NRC inquiry on their method of complying with the generic safety evaluation criteria by letter AECM 81/34 of September 2, 1981. The method described was accepted by the Office of Nuclear Reactor Regulation in paragraph 4.6 of the Safety Evaluation Report related to the operation of Grand Gulf Nuclear Station Units 1 and 2 issued September 1981. This item is closed.

- b. (Closed) IE Bulletin 79-24, Freeze Lines. The licensee's response by letter No. AECM 79-124 dated October 31, 1979 states that an evaluation has been performed. The current design of the plant heating equipment provides adequate protection from freezing. It was reported that several sensing lines in the ultimate heat sink between the concrete slab and top of the water level would be exposed to outside air. A subsequent review by the licensee showed that the water level will be maintained above the slab level thus keeping the sensing line from being exposed. Thus freeze protection is not required for these lines. This item is closed.
- 6. Licensee Identified Item
 - a. (Closed) CDR 77-13, (416/78-01-01) SRV Control Valves. On October 7, 1977, the licensee notified IE:II of a 50.55(e) item concerning the control circuits for the safety relief valves. The final report was submitted on October 30, 1981. The report has been reviewed and determined to be acceptable by IE:II. The design changes were discussed with the NRC staff in Bethesda, Maryland, on February 8, 1980. The staff has completed its review of the proposed changes and finds them acceptable as stated in the safety evaluation report related to the operation of Grand Gulf Nuclear Station Units 1 and 2, supplement No. 1 paragraph 6.2.1.8.2. The inspector held discussions with responsible licensee and/or contractor representatives and reviewed supporting documentation to verify that the corrective actions identified in the report have been completed.
 - b. (Closed) CDR 81-34, Incorrect Reactor Water Level Measuring Devices. On August 23, 1981, the licensee notified IE:RII of a 50.55(e) item concerning incorrect reactor vessel water level transmitters and trip units. The report has been reviewed and determined to be acceptable by IE:II. The inspector held discussions with responsible licensee and/or contractor representatives and reviewed supporting documentation to verify that the corrective actions identified in the report have been completed.
 - c. (Closed) CDR31-40, Presray Inflatable Seals for Personnel Airlocks. On October 8, 1981, the licensee, notified IE:II of a 50.55(e) item concerning potential cracking of inflatable seals manufactured by Presray. The report has been reviewed and determined to be acceptable by IE:II. The inspector held discussions with responsible licensee and/or contractor representatives and reviewed supporting documentation to verify that the corrective actions identified in the report have been completed.

- 7. Inspector Followup Items
 - a. (Closed) Open Item 416/81-36-01. The inspector reviewed the change to the checkout and turnover manual which specifies the proper method of voiding an approved construction work permit. There are no further questions concerning this item. This item is closed.
 - b. (Closed) Open Item (416/81-25-02) The inspector reviewed FSAR amendment 51 which removed the incorrect reference to the High Pressure Core Spray turbine. There are no further questions concerning this item. This item is closed.
 - c. (Closed) Open Item (416/80-24-04) This item is considered by the licensee to be an isolated occurrence of an oversight on the part of the QC representative. The incident was detected by QC during final review to meet their programatic requirements. The inspector has not detected any similar items during subsequent inspections. The inspector concurs that this appears to be an isolated occurrence. There are no further questions concerning this item. This item is closed.
 - d. (Closed) Open Item (416/81-10-13) The inspector reviewed the test change notice which incorporated the testing for the Standby Liquid Control Heat Tracing. There are no further questions concerning this item. This item is closed.
- 8. Plant Tour

The inspector toured portions of the control building, auxiliary building and containment. The inspector observed the work and operations in progress in the toured areas.

No violations or deviations were identified for the areas inspected.

9. Area of Worker Concern

A review of qualifications for ten startup test personnel was conducted. the review was to verify compliance with Grand Gulf Startup Manual paragraph 4.6.1. The review was performed on the records of ten startup personnel.

Of the personnel selected, seven were qualified and certified as preoperational or startup test supervisors. Three of the personnel are in a training status and reportedly not performing safety-related functions. As they are under the direct supervision of a qualified preoperational test supervisor.

No violations or deviations were identified for the areas inspected.

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TEALS



Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205

Gentlemen:

Subject: Report No. 50-416/82-11

This refers to the routine safety inspection conducted by Mr. A. H. Johnson of this office on February 8-11, 1982, of activities authorized by NRC Construction Permit No. CPPR-118 for the Grand Gulf facility and to the discussion of our findings held with Mr. C. K. McCoy, Plant Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Within the scope of this inspection, no violations or deviations were disclosed.

We have examined actions you have taken with regard to previously identified enforcement matters and unresolved items. The status of these items is discussed in the enclosed report.

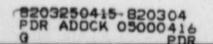
In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

F. S. Cantrell, Acting Chief Reactor Projects Branch 1 Division of Project and Resident Programs

Enclosure: (See Page 2)



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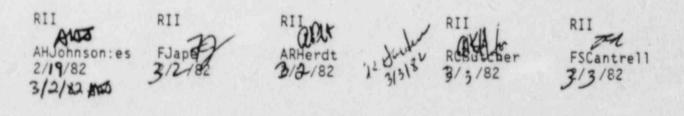
Mississippi Power and Light Co.

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Enclosure: Inspection Report No. 50-416/82-11

cc w/encl: D. C. Gibbs, Vice President Middle South Energy, Inc. C. K. McCoy, Plant Manager

bcc w/encl: Document Management Branch State of Mississippi NRC Resident Inspector



2



UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

Report No. 50-416/82-11

Licensee: Mississippi Power and Light Company Jackson, MS 39205

Facility Name: Grand Gulf

Docket No. 50-416

License No. CPPR-118

Inspection at Grand Gulf site near Port Gibson, MS

Inspectors: A. H. Johnso Thomas

Accompanying Personnel: A. K. Hardin, RII K. E. Davenport, RII

Approved by:

uppe Section Chief Jape,

Technical Inspection Branch / Division of Engineering and Technical Programs

3/2 ianed

3/3/82 Date Signed

Date Signed

SUMMARY

Inspection on February 8-11, 1982

Areas Inspected

This routine, una#nounced inspection involved 84 inspector-hours on site in the areas of preoperational test procedure review, preoperational test witnessing, review of outstanding items, and review of Field drawings (as-built) versus the FSAR.

Results

Of the four areas inspected, no violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

*C. K. McCoy, Plant Manager

- *J. W. Yelverton, QA Supervisor
- *J. C. Roberts, Startup Supervisor
- *J. C. Bell, QA Representative
- *M. A. Lacey, QA Representative
- A. M. Curdy, Plant Staff
- J. G. Cesare, Corporate Supervisor of Licensing
- P. J. Richardson, Corporate Licensing Assistant
- G. Johnson, Plant Staff Licensing

Other licensee employees contacted included startup engineers, technicians, operators, electricians, and security force members.

Nuclear Regulatory Commission

*A. K. Hardin, NRC Acting Section Chief *T. R. Collins, NRC Inspector *A. G. Wagner, Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on February 11, 1982, with those persons indicated in paragraph 1 above. The licensee had no questions concerning this report period and acknowledged the inspectors findings.

- 3. Licensee Action on Previous Inspection Findings
 - a. (Closed) Violation 50-416/81-51-01 stated that CTO was performing local leak rate testing with a CWP. The licensee QA closed out CAR 427 after the required startup staff training was documented. This item is closed.
 - b. (Open) Unresolved Item 50-416/81-35-02 stated that plant staff did not complete technical review and approval of change notice of FSAR Amendment 50 as per Procedure 09-S-01-1. This item remains open pending further action by the licensee.
 - c. (Open) Violation 50-416/81-30-01 was not ready to be closed as of February 11, 1982, and remains open pending further action by the licensee.

- d. (Closed) Unresolved Item 50-416/81-57-02 the failure of Startup to initial the authorization to start (ATS) block of MWO 812981 and 82 for work performed on the recirculation flow control valves. The licensee's QA closed out CAR 435 concerning this item. This item is closed.
- e. (Open) Unresolved Item 50-416/81-09-01 was not ready to be closed as of February 11, 1982 and remains open pending further action by the licensee.
- 4. Unresolved Items

Unresolved items were not identified during this inspection.

- 5. Review of Open Items
 - a. (Closed) PRD-81/51 Incorrect Standby Gas Treatment System (SGTS) Installation. The problems were corrected as documented in January 18, 1982 letter from MP&L to Region II. This item is closed (50-416/82-11-05).
 - b. (Open) Open Item LII 50-416/81-30-02 was not ready to be closed as of February 11, 1982, and remains open pending further action by the licensee.
 - c. (Open) Open Item IFI 50-416/81-35-01 was not ready to be closed as of February 11, 1982, and remains open pending further action by the licensee.
- 6. Preoperational Test Witnessing

The inspectors witnessed portions of the following preoperational tests to verify that the testing was conducted in accordance with approved procedures.

1P75PT01Standby Diesel Generator Preoperational Test (Division 1)1P81PT01HPCS Diesel Generator Preoperational Test

The inspectors observed overall test personnel performance to verify the following:

- a. An approved procedure of the appropriate revision was available and in use by all test personnel.
- Special test equipment required by the procedure was calibrated and in service.
- c. Test prerequisites, initial conditions and precautions were met; and those which were waived had been reviewed and approved in accordance with procedural requirements.

- d. Test data was collected and recorded for final analysis by the proper personnel.
- e. Deficiencies identified during conduct of the tests were properly documented.
- 7. Preoperational Procedure Review
 - a. Fuel Handling Equipment Preoperational Test. The inspectors reviewed portions of Preoperational Test Procedure 1F11PT01, Revision 1, Fuel Handling Equipment.
 - b. Reactor Core Isolation Cooling (RCIC) Preoperational Test. The inspectors reviewed portions of Preoperational Test Procedure 1E51PT01, Revision 1, Reactor Core Isolation Cooling System.
 - c. HPCS Diesel Generator Preoperational Test. The inspectors reviewed portions of Preoperational Test Procedure P81PT01, Revision 1, HPCS Diesel Generator.
 - d. Standby Diesel Generator Preoperational Test. The inspectors reviewed portions of Preoperational Test Procedure 1P75PT01, Revision 1, Standby Diesel Generator.

During this review there were no violations or deviations identified.

8. Field Drawing Versus FSAR

The inspectors reviewed and verified that the latest copy of the system field drawings were in agreement with the FSAR piping and instrumentation drawings and descriptions for selected systems. The following system drawings were reviewed for agreement:

- a. High Pressure Core Spray (HPCS) Figure 6.3-1 of the FSAR was compared to Bechtel drawing M-1086, revision 15 with DCN 14 (MP&L drawing 1E22-1015M).
- b. Low Pressure Core Spray (LPCS) Figure 6.3-4 of the FSAR was compared to Bechtel drawing M-1087 revision 17 (MP&L drawing 1E21-1015M).
- c. Combustible Gas Control System Figure 6.2-81 of the FSAR was compared to Bechtel drawing M-1091, Revision 11 (MP&L drawing 1E61-1015M).

The general system description in the FSAR for the systems noted above was reviewed to determine if the referenced drawings were in agreement with the FSAR. No discrepancies were noted. The systems noted above will be walked down in a future inspection to ensure the installation agrees with the system field drawings and the FSAR.

9. Containment Integrated Leak Rate Test Valve Lineups

The inspector reviewed the As Built System Diagrams and the Official Signed Off Valve Lineup for the Integrated Leak Rate Test. Each document was found to be consistent with each other with no problems identified.

- 10. Inspector Followup Items (IFI)
 - a. (Open) IFI 50-416/82-11-01

BWR main steam isolation valve leakage problems were discussed with the licensee. This item will be followed up during future inspections.

b. (Open) IFI 50-416/82-11-02

The inspectors discussed the potential for voiding the prototype testing of Division I and II standby (emergency) diesel generators when the pistons were modified after testing. This item will be followed up during future inspections.

c. (Open) IFI 50-416/82-11-03

This inspector questioned the practice of not allowing the Division I and II standby diesel generators enough time to return to ambient standby temperature between acceptance test starts of the diesels. This item will be followed up in future inspections.

d. (Open) IFI 50-416/82-11-04

The inspectors are following the delivery date of the containment personnel air seals of April 1, 1982. These new seals are required to ensure primary containment integrity. The licensee has given this a Priority I status. This item will be followed up in future inspections.

11. February 8, 1982 Meeting with MP&L Corporate Licensing Staff

The inspectors met with MP&L corporate licensing representatives along with Startup and QA representatives to discuss the concerns over updating preoperational test and plant procedures when FSAR amendments and letters of commitment to NRR are issued. The licensee stated that commitments would be given and implemented to resolve these concerns (See Unresolved Item 50-416/81-35-02).

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MAR 1 8 1982

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Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205

Gentlemen:

Subject: Report Nos. 50-416/82-16 and 50-417/82-06

This refers to the routine safety inspection conducted by Mr. T. D. Gibbons of this office on February 23-26, 1982, of activities authorized by NRC Construction Permit Nos. CPPR-118 and CPPR-119 for the Grand Gulf facility and to the discussion of our findings held with Mr. C. K. McCoy, Plant Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no violations or deviations were disclosed.

We have examined actions you have taken with regard to previously reported unresolved items. The status of these items is discussed in the enclosed inspection report.

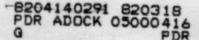
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Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

F. S. Cantrell, Acting Chief Reactor Projects Branch 1 Division of Project and Resident Programs

Enclosure: See Page 2



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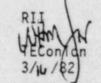
Mississippi Power and Light Company

cc w/encl:

D. C. Gibbs, Vice President Middle South Energy, Inc.
C. K. McCoy, Plant Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Mississippi

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UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

Report Nos. 50-416/82-16 and 50-417/82-06

Licensee: Mississippi Power and Light Company P. O. Box 1640 Jackson, MS 39205

Facility Name: Grand Gulf Units 1 and 2

Docket Nos. 50-416 and 50-417

License Nos. CPPR-118 and CPPR-119

Inspection at Grand Gulf site near Port Gibson, MS

Inspector: Approved by: U Conlon Section Chie Engineering Inspection Branch Division of Engineering and Technical Programs

3/15/82 Date Signed

3/16/82 Date Signed

SUMMARY

Inspection on February 23-26, 1982

Areas Inspected

This routine, unannounced inspection involved 24 inspector-hours on site in the areas of fire protection of cable trays, followup on licensee identified items, review of QA procedures and quality records for electrical components.

Results

Of the areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*C. K. McCoy, Plant Manager *M. A. Lacey, QA Consultant *J. W. Yelverton QA, Field Supervisor

NRC Resident Inspector

*A. G. Wagner

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on February 26, 1982, with those persons indicated in paragraph 1 above.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Independent Inspection Efforts

The inspector examined the fire protective wrapping of Class 1E cable trays in the auxiliary building. The inspector examined the sealing of penetrations for fire seals in the auxiliary building.

Within the areas examined there were no violations identified.

6. Licensee Identified Items

a. (Closed) Item 416/CDR 81-36 and 417/CDR 81-24, "Incorrectly Sized Beam for Cable Tray Supports" (10 CFR 50.55(e)). The final report was submitted on October 1, 1981 and revised report on February 19, 1982. The report has been reviewed and determined to be acceptable. The inspector held discussions with responsible licensee representatives, and viewed supporting documentation to verify that the corrective ertions identified in the report have been completed. The February 19, 1982 report clarified the chronology relating to this item and closes Unresolved Item 81-60-01.

- b. (Closed) Item 416/CDR 81-39 "Remote Shutdown Panels" (10 CFR 50.55(e)). The final report was submitted on February 19, 1982. The report has been reviewed and determined to be acceptable. The inspector held discussions with responsible licensee representatives, reviewed supporting documentation, and observed representative samples of work to verify that the corrective actions identified in the report have been completed. The licensee has repaired the unacceptable wiring.
- c. (Closed) Item 416/CDR 80-68 "Potter and Brumfield Relay Terminations" (10 CFR 50.55(e)). The final report was submitted on February 15, 1982. The report has been reviewed and determined to be acceptable. The inspector held discussions with responsible licensee representatives, reviewed supporting documentation, and observed representative samples of work to verify that the corrective actions identified in the report have been completed. The licensee has repaired the unacceptable termination.
- 7. Electrical (Components and Systems) Review of Quality Assurance Procedures and Review of Quality Records (Unit 1)

The inspector reviewed four relay coordination calculations to assure that they complied with the QAM in the areas of procedures, qualified review and corrective action. The calculations examined were:

PR	73	Revision	1,	dated	February	1, 1982
PR	28	Revision	0,	dated	March 2.	1978
PR					February	
PR					February	

Within the areas examined chere were no violations identified.

8. Review of As-Builts

The inspector selected four raceway runs as follows: AATMI4Z, 1BATW26, 1BATW27, and 1BATW28 and three conduit runs as follows 1BARNQ08, 1ABRMH40, and 1ABRM263 to verify that the SAR and QAM were complied with in the areas of location, routing, supports, separation, isolation, loading and identification.

Three cable as-built routings were examined to verify routing, identification, protection and separation. Three cable terminations were examined to assure that the design document and the installed wiring agreed.

Within the areas examined there were no violations identified.

Yellow

MAR 2 3 1982

Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205

Gentlemen:

Subject: Report No. 50-416/82-18

This refers to the routine safety inspection conducted by Mr. A. G. Wagner of this office on February 16 - March 10, 1982, of activities authorized by NRC Construction Permit No. CPPR-118 for the Grand Gulf facility. Our preliminary findings were discussed with Mr. C. K. McCoy, Plant Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

During the inspection, it was found that certain activities under your license appear to violate NRC requirements. This item and references to pertinent requirements are listed in the Motice of Violation enclosed herewith as Appendix A. Elements to be included in your response are delineated in Appendix A.

One new unresolved item is identified in the enclosed inspection report. This item will be examined during subsequent inspections.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

The responses directed by this letter and the enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Mississippi Power and Light Company

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Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

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F. S. Cantrell, Acting Chief Reactor Project Branch 1 Division of Project and Resident Programs

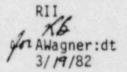
Enclosures:

1. Appendix A, Notice of Violation

2. Inspection Report No. 50-416/82-18

cc w/encl: D. C. Gibbs, Vice President Middle South Energy, Inc. C. K. McCoy, Plant Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Mississippi









APPENDIX A

NOTICE OF VIOLATION

Mississippi Power & Light Company Grand Gulf Docket No. 50-416 License No. CPPR-118

As a result of the inspection conducted on February 16 - March 10, 1982, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

10 CFR 50, Appendix B, Criterion V as implemented by MP&L Operations Quality Assurance Program section 5.5 requires that activities affecting quality or safety be prescribed in instructions, procedures, or drawings and be performed in accordance with the instructions, procedures or drawings. Administrative Procedure 01-S-02-2, Revision 6, paragraph 6.2.8 requires that administrative procedures be reviewed by the assistant plant manager.

Contrary to the above, on March 5, 1982, Administrative Procedures 01-S-06-2, Revision 4 and 01-S-06-3, Revision 5 were implemented without being reviewed by the assistant plant manager.

This is a Severity Level VI Violation (Supplement II.).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under ofth or affirmation.

Date: MAR 2 3 1982



UNITED STATES NUCLEAR REGULATORY COMMISSION **REGION II** 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

Report No. 50-416/82-18

Licensee: Mississippi Power and Light Company

Facility Name: Grand Gulf

Docket No. 50-416

License No. CPPR-118

Inspection at Grand Gulf site near Port Gibson, Mississippi

Inspectors: Lon A. G. Wagner Cr t Approved by:

A. Hardin, Acting Section Chief, Division of Project and Resident Programs

3/13/82 Date Signed

3/22/82 Date Signed

3/22/82 Date Signed

SUMMARY

Inspection on February 16 - March 10, 1982

070856 820 ADOCK 0500

Areas Inspected

This routine, announced inspection involved 110 inspector-hours on site in the areas of IE Circular follow up, IE Bulletin follow up, TMI Task Action Plan Implementation, As-built comparison, Preoperational Test Witnessing, System Turnover Review, System Jurisdictional Controls, Quality Assurance Monitoring, Plant Tour, and Plant Maintenance Review.

Results

Of the 10 areas inspected, no violations or deviations were identified in 9 areas; one item of noncompliance was found in one area (Failure to follow procedure, paragraph 7).

DETAILS

1. Persons Contacted

Licensee Employees

*C. K. McCoy, Plant Manager *C. L. Stuart, Assistant Plant Manager *J. W. Yelverton, Quality Assurance Supervisor *L. C. Daughtery, Plant Quality Supervisor *M. A. Lacey, QA Consultant *J. C. Bell, QA Engineer *R. Roma, Test Supervisor *R. McAnulty, Test Supervisor

*Attended exit interview

Exit Interview 2.

The inspection scope and findings were summarized on March 10, 1982, with those persons indicated in paragraph 1 above. The licensee had no comments regarding the violation. The plant manager commented in reference to paragraph 14 herein that these procedures had not received the review committed to by MP&L in regard to field TCN's made to instrument surveillance procedures.

Licensee Action on Previous Inspection Findings

3.

Not inspected.

Unresolved Items 4.

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. New unresolved items identified during this inspection are discussed in paragraph 14.

IE Circular Follow-up 5.

The inspector reviewed the actions taken by the licensee with regards to the following IE Circulars. Documentation of circular review for applicability and corrective actions were reviewed. The inspector had no comments concerning the licensee actions and the

fcllowing IE Circulars are closed: a.

	81/08
80/03	81/10
80/10	01/

b. The licensee has not completed review and corrective actions for the following items. These items remain open:

80/11	81/05	81/13
80/22	81/07	81/14

6. IE Bulletin Follow-up

The inspector reviewed the actions taken by the licensee with regards to the following IE Bulletins. Documentation of bulletin review for applicability, suggested corrective action, technical evaluation and corrective actions were reviewed.

a. The following bulletins have been responded to by the licensee. These responses have been reviewed and there are no further questions. These items are closed

80-03 81-02

b. The following bulletin has been responded to by the licensee. This response is currently under review:

80-11

c. The licensee has not completed review and corrective actions for the following bulletins:

79-02	79-14	79-27	80-24
79-07	79-15	80-06	81-01

7. TMI Task Action Plan Implementation

A verification was conducted of the actions implementing the requirements of the TMI Task Action Plan. These requirements are delineated in NUREG 0660 and 0737. The licensee has responded to the NRC by letters AECM 81/387 on October 12, 1981, AECM 81/153 of June 12, 1981 and AECM 81/276 of August 19, 1981 describing the implementation or providing an implementing procedure for the plan item. The NRC staff has reviewed the responses and have provided evaluations in NUREG 0831, Safety Evaluation related to the Operation of Grand Gulf Nuclear Station, Units 1 and 2 (SER). The following items were reviewed with comments as noted:

- a. I.C.7 NSS Vendor Review of Low Power Test Procedures. This item has not been accomplished and will remain open.
- b. II.D.3 Relief and Safety Valve Indication

The licensee committed to the installation of a pressure sensing device in the Safety and Relief valve exhaust line. This installation to provide positive indication that the valve is open. A field verification was performed on the installation. The mechanical components have been installed. The electrical modifications have not been completed in the indication circuitry. The licensee had not identified in his preoperational and startup testing programs the required static and dynamic verification tests. This item remains open.

c. II.F.2 Inadequate Core Cooling Instruments

The licensee has responded with their concurrence with the BWR Owners Group position. The Owners Group endorses generic guidelines for the development of plant specific emergency procedures. It is their position that no further instrumentation is required. It was concluded from the staff review that there will be additional instrumentation required. The SER states in section 22.2, II.F.2 that additional instrumentation and supporting documentation addressing these requirements be incorporated by June 1983 in accordance with Regulatory Guide 1.97. This item remains open.

- d. II.K.1 IE Bulletins on Measures to Mitigate SBLOCA's and Loss of F. W. Accidents.
 - Item 5. The following observations were made in regards to the licensee response as outlined in the FSAR. This item remains open.
 - (a) The inspector reviewed the Protective Tagging Procedure for the use of miniature tags on control panels. It does not contain a requirement for using minature information tags. During a control room tour large information tags were in use.
 - (b) The inspector reviewed administrative procedures 01-S-06-12, Revision 3 and 01-S-07-1, Revision 5 for incorporation of the requirement that procedures for surveillance testing and maintenance will include provisions to ensure proper valve alignments for engineered safety features functioning upon return to normal. Neither procedure had incoporated this requirement.
 - (c) The following requirements were not incorporated into the plant administrative procedures:
 - When possible, Operations will perform a functional test or Surveillance Operability Test following maintenance on any safety related system. When such tests are not possible, a complete valve and electrical lineup will be performed within the tagged boundary and a partial functional test will be performed where possible to provide assurance that systems are in fact functional after maintenace.

- During periodic tours, Operators and Supervisory personnel will conduct spot checks of fluid system and electrical line-ups.
- System line-up changes, other than those covered by step-by-step procedures will be logged and abnormal line-ups will be covered during shift turnover.
- (2) Item 10. The inspector reviewed the following administrative procedures verifying that requirements for safety related system operability status is assured as outlined in the SER.

01-S-06-02, Revision 4 01-S-06-12, Revision 3

This item is closed.

- (3) Item 22. This item is not completed.
- (4) Item 23. The staff has reviewed the licensee response and has concluded in the SER that no additional commitments are necessary. This item is closed.
- e. II.K.3 Final Recommendations of B&O Tsk Force
 - Item 13B. The staff has concluded in the SER that no modifications are required for this item. This item is closed.
 - (2) Item 15. The inspector has verified documentation of completion of the required modification. The requirements for testing the modification are included in the preoperational test. This item is closed.
 - (3) Item 22. This inspector has verified documentation of completion of the required modification. The requirements for testing the modification are included in the preoperational test. This item is closed.
 - (4) Item 24. The Grand Gulf design includes room coolers for safetyrelated pump rooms. No modifications are required for this item. This item is closed.
 - (5) Item 27. The inspector has verified the installation of the required reference level modifications. The incorporation of the common water level reference for the Safety Parameter Display System will be performed in TMI Action Plan Item I.D.2. This item is closed.

During the review of Administrative Procedures 01-S-06-02, Revision 4, Audit of Operators and 01-S-06-03, Revision 5, Control of System Temporary Alterations, it was noted that they were not reviewed by the assistant plant

manager. Administrative Procedure 01-S-02-02, Revision 6, Control and use of the GGNS Operations Manual paragraph 6-2-8 requires that administrative procedures be reviewed and approved by appropriately designated plant management. In the above cases, the Nuclear Support Manager reviewed the procedure for himself and the Assistant Plant Manager. This will be identified as violation 416/82-18-01, failure to follow procedure. The inspector did not review all approved administrative procedures for additional examples.

8. Comparison of As-Built Plant to FSAR Description

The High Pressure Core Spray (HPCS), Low Pressure Core Spray (LPCS) and Combustible Gas Control System were inspected by direct observation to determine that the physical installation was in agreement with the P&ID's and the system descriptions contained in the FSAR. Portions of the systems, such as the pump suction lines that originate in the suppression pool or the minimum flow and test return lines that discharge back into the suppression pool, could not be verified since the suppression pool was filled with water. There were two problems noted. Approximately one-half of the valves were missing identification tags and had to be verified by location in the system. The installation of identification tags assist operators during component operations, they minimize personnel exposure in radiation areas and reduce operational errors. This will be carried as inspector follow-up item 416/82-18-02.

The P&ID's do not show, nor do they identify, isolation valves in piping that leads to instruments. This has been previously identified and is carried as inspector follow-up item 81-25-03.

9. Preoperational Test Witnessing

The inspector witnessed the conduct of portions of preoperational test 1C71PT01, Reactor Protection System Preoperational Test. The test was observed for conformance with Grand Gulf Startup Manual Chapter 5000 and 7000. During the conduct of the Separation Test both the 'A' and 'B' solenoids of the outboard Main Steam Isolation Valves deenergized. The test was stopped and a startup field report was submitted in accordance with the startup manua? requirements.

No violations or deviations were identified within the areas inspected.

10. System Turnover Reviews

The turnover packages for portions of the Process Radiation Monitoring and the Emergency Lighting System were reviewed for conformance to the requirements of Grand Gulf Startup Manual Chapter 7000 and Bechtel Checkout and Turnover Organization Manual Chapter 4, section 16.

No violations or deviations were identified within the areas inspected.

11. System Jurisdictional Controls

Portions of the Process Radiation Monitoring System and the Emergency Lighting System were visually spot checked to verify system tagging had been accomplished as required by the Grand Gulf Startup Manual Chapter 5000, paragraph 4.4.

No violations or deviations were identified within the areas inspected.

12. Quality Assurance Monitoring

The inspector reviewed the quality assurance monitoring activities in the preoperational test area. The activities were reviewed for conformance with Quality Assurance Procedures Manual, Chapter 18.20. The following reports were reviewed.

MAR 82/09 Preoperational Test 1C88ST03
MAR 82/12 Plant Safety Review

There was one deficiency noted during the conduct of the monitoring audit. The documentation of the deficiency and the corrective actions were contained in CAR 477. The CAR was reviewed to ensure that corrective actions have been appropriately completed.

No violations or deviations were identified within the areas inspected.

13. Plant Tour

The inspector toured portions of the control building, auxiliary building, containment and diesel generator structures. The inspector observed the following activities in progress: hot work; housekeeping; equipment preservation; fire equipment and communications.

No violations or deviations were identified within the areas inspected.

14. Plant Maintenance Review

The inspector reviewed the records for the conduct of the following maintenance activity MWO's:

1N5524 approved 3-4-82 1N5517 approved 3-4-82 1N5518 approved 3-4-82 1N5516 not satisfactorily completed 1N5046 approved 3-4-82 1N5039 approved 3-2-82 1N5040 approved 3-2-82

These activities require the conduct of instrument response tests. The activities were observed for conformance to the Grand Gulf Nuclear Station

Operations Manual, Volume 1 and 7 and the MPL-Topical-1A. The following discrepancies were observed.

- a. 1N5524, 1N5517, 1N5518 and 1N5516 did not have the procedural requirement correctly incorporated into data sheet, paragraph 5.16.26. Three of the four procedures did not indicate that the prerequisites were met for performing the procedure.
- b. 1N5046 TCN #3 changed the note in Data Sheet II but was not correctly transcribed in the data package. Step 5.16.24 was deleted in the data package and marked TCN #3 but was not included in the approved copy of TCN #3.
- c. 1N5039 TCN #2 made approximately twenty changes to the data sheet. Approximately ten of these changes were not entered on to the data sheet. Step 5.15.14 had the level point changed from 8 + 1 to 9 + 0.5 and was annotated TCN #2. TCN #2 did not include this change.
- d. 1N5040 did not include TCN #2 step 5.15.3 change.

The inspector was not informed prior to the review that these procedures had not had the final review for the TCN problems identified in I&E inspection report 50-416/82-13. However, each contained the dated signature of the I&C superintendent. The inspector is concerned that plant staff personnel have not been provided appropriate guidance as to tra significance of signature sign-offs on official plant records. This item is considered unresolved pending further review by the licensee and the NRC. Unresolved Item 416/82-18-03. The corrective actions for TCN errors will be reviewed after the licensee has responded to previously opened violation 416/82-13-01. APR 26 1982

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Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205

Gentlemen:

8205280449

Subject: Report No. 50-416/82-19

This refers to the routine safety inspection conducted by Mr. A. H. Johnson of this office on March 9-12, 1982, of activities authorized by NRC Construction Permit No. CPPR-118 for the Grand Gulf facility. Our preliminary findings were discussed with Mr. C. L. Stuart, Assistant Plant Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

During the inspection, it was found that certain activities under your license appear to violate NRC requirements. This item and references to pertinent requirements are listed in the Notice of Violation enclosed herewith as Appendix A. Elements to be included in your response are delineated in Appendix A.

One new unresolved item is identified in the enclosed inspection report. This item will be examined during subsequent inspections.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

The responses directed by this letter and the enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Mississippi Power and Light Company

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Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

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F. J. Long, Acting Chief Reactor Projects Branch 1 Division of Project and Resident Programs

Enclosures:

- 1. Appendix A, Notice of Violation
- 2. Inspection Report No. 50-416/82-19

cc w/encl: D. C. Gibbs, Vice President Middle South Energy, Inc. C. K. McCoy, Plant Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Missiscippi

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APPENDIX A

NOTICE OF VIOLATION

Mississippi Power and Light Company Grand Gulf 1

Docket No. 50-416 License No. CPPR-118

As a result of the inspection conducted on March 9-12, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified.

10 CFR 50, Appendix B, Criterion V and the implementing section of the Operational Quality Assurance Manual, MP&L-Topical-1, paragraph 5.4.1 require activities affecting quality be performed in accordance with documented instructions, procedures or drawings. Specifically, data sheets are required to be dated and signed by the data taker or the supervision of the data taker, and if test results are not within the stated acceptance criteria, an Exception Sheet is required to document the problem. Testing may continue when the criteria of Exception Sheet usage are met.

Contrary to the above, during March 9-10, 1982, and while performing the HPCS prototype test, the test supervisor improperly was signing for collected and logged data in that these data were not dated and signed.

Secondly, testing was continuing even though acceptance criteria was above specified limit and an Exception Sheet was not initiated to document this exception.

The above are two examples of a failure to follow procedure.

This is a Severity Level V Violation (Supplement II.E).

Pursuant to the provisions of 10 CFR 2.201, you are hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Data: APR 26 1982

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UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

Report No. 50-416/82-19

Licensee: Mississippi Power and Light Company P. O. Box 1640 Jackson, Mississippi 39205

Facility Name: Grand Gulf

Docket No. 50-416

License No. CPPR-118

Inspection at Grand Gulf site near Port Gibson, Mississippi

Inspectors: A. H. Johnso Μ. Thomas Approved by: F. Jape, Section Chief Engineering Inspection Branch

Division of Engineering and Technical Programs

SUMMARY

Inspection on March 9-12, 1982

Areas Inspected

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This routine, unannounced inspection involved 52 inspector-hours on site in the areas of preoperational test procedure review and preoperational test witnessing.

Results

Of the two areas inspected, one violation with different examples was found in both areas. At the exit meeting the licensee acknowledged the violation. Failure to follow procedure (416/82-19-01).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*C. L. Stuart, Assistant Plant Manager

*R. A. Ambrosino, Nuclear Support Manager

*C. R. Hutchinson, Startup Manager

*J. C. Roberts, Startup Supervisor

*J. W. Yelverton, QA Supervisor

*C. Hayes, Acting Plant QA Superintendent

*L. F. Daughtery, Plant QA Representative

*M. A. Lacey, QA Consultant

Other licensee employees contacted included startup supervisors, technicians, operators, security force members, and office personnel.

NRC Resident Inspector

A. G. Wagner

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on March 12, 1982, with those persons indicated in paragraph 1 above, with subsequent telephone calls to the Plant Manager on March 15, 1982 by F. S. Cantrell.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. New unresolved items identified during this inspection are discussed in paragraph 6.

5. Preoperational Test Witnessing

The inspectors witnessed portions of preoperational test 1P81PT04, HPCS Diesel Generator Prototype Qualification Test, to verify that testing was conducted in accordance with approved procedures. With regard to the above items, the inspectors identified concerns relative to two areas. The above preoperational test procedure was reviewed for conformance with Regulatory Gu'des 1.68 and 1.108, and FSAR Chapter 14. The inspectors verified that management review and approval were indicated, test objectives were clearly stated and acceptance criteria were specified. The inspectors observed overall test personnel performance to verify the following:

- An approved procedure of the appropriate revision was available and in use by all test personnel.
- b. Special test equipment required by the procedure was calibrated and in service.
- c. Test prerequisites, initial conditions and precautions were met; and those which were waived had been reviewed and/or approved in accordance with procedural requirements.
- d. Test data was collected and recorded for final analysis.
- e. Deficiencies identified during conduct of the test were properly documented.

During the official preoperational HPCS prototype testing the startup test supervisor did not follow the test procedure for meeting lube oil temperature requirements of less than or equal to 70 degrees centigrade (as recorded in test step 7.1.5.1 and on data sheets 8.7 and 8.8) before starting the HPCS diesel generator for start number 3 and start number 4. The test supervisor also did not follow the procedure in that the data sheets were not dated and signed/initialed by the data taker as required by the startup manual. These two examples of failure to follow procedure constitute a violation (416/82-19-01).

HPCS Diesel Generator Prototype Test Unresolved Item (416/82-19-02)

The test description for preop test 1P81PT04 states that the HPCS diesel generator will be started five consecutive times from the local control panel. Three of the starts will be from the cold (warm standby) condition and two of the starts will be from the hot (immediately after shutdown) condition. A March 31, 1978 letter from Mr. Olan D. Parr, Chief, Light Water Reactors Branch No. 3, to the General Electric Company (GE), required the above condition of three cold and two hot starts. During review of the as-run copy of the procedure (section 7.1) the inspectors found that four of the five starts were from the cold condition. This does not agree with the test description or the letter from Parr to GE. During discussions with licensee personnel concerning performance of this portion of the test, the licensee stated that section 7.1 states that at least three of the starts (not three cold and two hot) will be from the cold condition. Thus, by doing four starts from the cold condition, the test requirements (as stated in section 7.1) were met. This discrepancy between the test description and performance of section 7.1 of the test procedure will be carried as an unresolved item (416/82-19-02).

Updating Preoperation Test with Design Changes, Inspector Followup Item 7. (416/82-19-03)

8.

During review of the data sheets for section 7.1 of test procedure 1P81PT04 the inspector found that the diesel generator lube oil and jacket water minimum temperature limits had not been met prior to starting the HPCS diesel. However, section 7.1 had been signed by the test supervisor indi-cating that all the requirements of section 7.1 had been met. During discussions with licensee personnel the inspectors found that the lube oil and jacket water minimum temperature limits had been lowered by a recent design changes. A test change notice had been issued showing the change. The licensee stated that all sections of 1P81PT04 had been updated and this was an isolated case due to an oversight by the test supervisor. During future inspections, the inspectors will verify that the licensee is incorporating design changes into the preoperational testing program. This concern is identified as inspector followup item (IFI 416/82-19-03). Inspector Concern Regarding Possible Full Implementation of the Plant QC

The inspector observed a possible bogging down of the plant QC inspection program due to the fact of the required 100 percent plant and testing Program procedure review, along with the spot checking of acceptance data for the testing program. The above are required to be implemented by the MP&L, Operational Quality Assurance Manual. During telephone calls of March 15, 1982 between Mr. C. K. McCoy and Mr. F. S. Cantrell, Mr. McCoy stated that plant QC would insure a certain amount of plant monitoring, by either delaying rate of procedure review, or increasing manpower.

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Mississippi Power and Light Company ATTN: Mr. N. L. Stampley Vice President of Production P. O. Box 1640 Jackson, MS 39205

Gentlemen:

Subject: Report No. 50-416/82-37

This refers to the routine safety inspection conducted by Mr. W. B. Swan of this office on May 4-7, 1982, of activities authorized by NRC Construction Permit No. CPPR-118 for the Grand Gulf facility and to the discussion of our findings held with Mr. C. K. McCoy, Plant Manager, at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, no violations or deviations were disclosed.

We have examined actions you have taken with regard to a previously reported unresolved item. The status of this item is discussed in the enclosed inspection report.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1).

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

Cantries

F. J. Long, Acting Chief Reactor Projects Branch 1 Division of Project and Resident Programs

Enclosure: Inspection Report No. 50-416/82-37

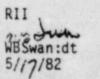
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Mississippi Power & Light Company

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cc w/encl: D. C. Gibbs, Vice President Middle South Energy, Inc. C. K. McCoy, Plant Manager

bcc w/encl: NRC Resident Inspector Document Management Branch State of Mississippi











UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA ST., N.W., SUITE 3100 ATLANTA, GEORGIA 30303

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Report No. 50-416/82-37

Licensee: Mississippi Power and Light Company Jackson, MS

Facility Name: Grand Gulf

Docket No. 50-416

License No. CPPR-118

Inspection at Grand Gulf site near Port Gibson, Mississippi

Inspector: 11.13. W. B. Swan

5/18/82 Date Signer

Approved by:

F. S. Cantrell, Section Chief, Division of Project and Resident Programs 5/18/82 Date Signed

SUMMARY

Inspection on May 4-7, 1982

Areas Inspected

This routine, announced inspection involved 32 inspector-hours on site in the areas of review of as-built configuration of plant Unit 1 and one open item on valve classification.

Results

Of the area inspected, no violation or deviations was identified.

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DETAILS

1. Persons Contacted

Licensee Employees

*T. E. Reaves, Jr., Corporate QA Manager

*C. K. McCoy, Nuclear Plant Manager

*J. C. Roberts, Startup Supervisor

*J. W. Yelverton, Field QA Supervisor

S. Tanner, QA Coordinator

*R. Williams, Office/Services Supervisor

*J. Kelley, NDE Specialist

B. Lee, QA Representative

D. Little, QA Representative

P. Different, Technical Support Section, Reactor Engineering

R. Dubey, PHD, Design Engineer Supervisor

Other organizations

D. Lindsey, Lead Piping Mechanical QC Engineer, Bechtel Power Corporation

C. O'Neil, Project Engineering Supervisor,

Light Structures Design, Bechtel Power Corporation

J. Novak, Design Engineer, Anchors, Bechtel Site Project Engineering

NRC Resident Inspectors

A. Wagner, Senior Resident *D. Scott

*Attended Exit Interview

2. Exit Interview

The inspection scope and findings were summarized on May 7, 1982, with those persons indicated in paragraph 1 above. The licensee had no comments regarding the inspection findings.

Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item 416/82-10-01 "Uncertainties in ASME Code Class for Valves."

Amendment No. 55 to the FSAR issued in April, 1982 corrected the classifications of questioned non-NSSS valves to conform with class designations in the specification and drawings, which listed them as Class 2. The inspector reviewed the Amendment and found it adequate to resolve this item.

The FSAR Amendment deleted feedwater inlet valve B 21 F065-A/B and RCIC steam supply valve E 51F013 from Table 5.2-5 and added then to the listing

of non-NSSS valves in Table 3.9-3C, with ASME Section III Code Classification 2.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Review of As-builts (I&E Procedure 37051B)

The objectives of this inspection of safety-related systems were to determine that as-built conditions, design and construction drawings correctly depict the as-built condition of the plant; that changes from the original design (or SAR) were properly reviewed and approved; and that plant seismic and other stress calculations are based on as-built conditions.

Document Control:

Changes to drawings to reflect as-built conditions are primarily controlled through Bechtel field document control unit and made by Bechtel design group at Gaithersburg, Maryland. Drawing changes are routed through MP&L Records (DCU) unit of the Office Service Section. For systems which have been turned over to Startup Test, ECN's, FCR's and as-built changes are routed to the specific responsible startup engineer for verification and approval. For systems not already turned over to MP&L, the proposed or effected change documents are routed to the responsible system engineers in the MP&L technical engineering support group.

The inspector examined samples of the memoranda concerning drawing changes and as-built documentation from the records section to the systems startup supervisors and technical support units. The personnel involved were interviewed. The production of new as-built aperture cards and cancellation of the out dated cards were witnessed.

Documents reviewed included:

- a. MP&L Plant Operations Manual, Vol. 13, Section 01: Instruction 13-S-01-55, Revision 7, Office Services Section Instruction, Maintenance of Plant Drawings Safety-Related.
- b. FSAR Section 3, Design Criteria; Parts 3.5 and 3.7.
- c. Bechtel Project Engineering Procedures Manual, Section 4.3 Drawing/Document Procedures

4.3.4 Design Change Package 4.3.5 Design Turnover Package 4.4 Calculations 4.4.6 Review and Approval MP&L QA Audit No. BCGA-8207 Audit of Bechtel Gaithersburg (Construction)

Seismic Loading Considerations for As-Built Drawings:

Basic stress calculation for structure and piping systems were made by Bechtel, Gaithersburg.

Changes in loadings, static and dynamic including seismic, occur due to changes in procedures, dimensions, equipment, or location of hanger, supports, anchors, guides and snubbers. Information on changes are fed to Gaithersburg design where calculations on loading changes are made. Any necessary redesigns on systems except for anchors are accomplished there. For anchors, Gaithersburg notifies the Bechtel site Small Structures Design group of changed loadings. This group, using specified design criteria, makes revised stress calculations for any involved anchors and redesigns anchors where necessary. This procedure gives assurance that changed loadings, including seismic, are compensated for in the as-built condition.

Review of Calculations for Anchors and Restraints:

With engineers in the Bechtel site Small Structures group the inspector reviewed the calculations and drawings made for revision 2 to drawing Q1C11G002 A01 for a pipe anchor in the auxiliary building. Loadings and force directions supplied by Gaithersburg were worked into formulas based on specified design criteria.

The inspector compared the as-built configuration with details of drawing Q1E22G001C01 for a complex dual restraint on the 16" High Pressure Core Spray discharge line. No discrepancy was noted.

With a site MP&L stress analyst, the inspector reviewed checks of calculations by Bechtel Gaithersburg reported in the MP&L Audit No. BCGA-82/07 of Bechtel Caithersburg on "Criterion III, VI, XVI, XVII, and Verification of Corrective Action." The auditors had concluded that Bechtel calculations and design for various hangers at piping systems were correct and adequately met FSAR and ASME Section III criteria for all stresses including seismic.

By discussions with the stress analyst and review of the audit report, the inspector was assured that as-built designs of anchors, restraints and piping meet requirements for seismic and other loadings.

Inspection of As-built Systems:

The inspector compared the as-built conditions of three major pipeline systems with changes noted on as-built documents. Pipe routing,

component type and location, dimensions, anchors and restraints were noted and compliance with change documents was verified. Systems inspected were:

E-12 Residual Heat Removal E-22 High Pressure Core Spray E-51 Reactor Core Isolation Cooling

Drawings referred to included:

M-1348 B, Rev. 14, System Piping Isometric, RHR "B" Pump Suction and Discharge - Unit 1
HL-1348B, Rev. 7 - Same Title (Hangers)
M-1346A, Rev. 23, 24, and 25, System Piping Isometric RCIC Pump Discharge to RPV Head Spray
HL-1346A, Rev. 11, Same Title, Hangers
M-1349A, Rev. 18, System Piping Isometric, HPCS Pump Discharge to Auxiliary Building and CTMT-Unit 1

HL-1349, Rev. 15, same title (Hangers)

Electrical connections to motor control valves were noted. Cable tray details, supports and routing were noted. No violation was identified.

Conclusion: The inspector determined that the licensee has a workable, working system for assuring the timeliness and accuracy of information pertaining to changes and for posting as-built drawings and associated documents. In the areas examined, the as-built information was acceptably current for status of construction and startup testing of systems.

No violation or deviation was identified in the areas examined.

ENCLOSURE 3



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

April 18, 1984

MEMORANDUM FOR: Darrell G. Eisenhut, Director Division of Licensing

FROM: Roger J. Mattson, Director Division of Systems Integration

SUBJECT: GRAND GULF 1 - INCONSISTENCIES IN FSAR VS AS-BUILT PLANT

At your meeting with H. Denton yesterday, DSI was asked to determine if the inconsistencies identified by MP&L between the FSAR and the as-built plant were of such a nature that the proposed Order Restricting Conditions for Operation should not be issued.

Enclosure 1 identifies four such inconsistencies which are within the DS1 scope of responsibility. (Note: five items are listed; however, items #74 and 112 and duplicates).

As described in Enclosure 2, none of these items preclude issuance of the Order.

Roger C. Mattson, Director Division of Systems Integration

Enclosures: As stated

cc: H. Denton

- E. Case
- T. Novak
- E. Adensam
- L. Kintner
- R. Vollmer

Enclosure 1

INCONSISTENCIES: FSAR vs. AS-BUILT PLANT

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				COMMENTS
NOTE	TSPS #	PRIORITY	SAFETY, SIGNIFICANCE	CURINENTS
52	073 102 304	2B 2B 2D	Smoke detection is provided for subject areas. Overall SER conclusions not impacted.	a. FSAR 9A.7.2.2.24 and 69 states that smoke detectors will be installed. The as-built plant has these detectors installed. FSAR is not current.
			Purely editorial. Renaming of zones does not alter fire protection requirements or measures provided. Overall SER conclusions are not impacted.	b. FSAR Figure 9A-22 does not correctly identify fire detection zones. The design documentation does identify the zones correctly. (Applies to diesel generator buildings.)
74	Washington and in case of some state of the local of the	<u>CSO 3A</u>	The FSAR discussion should be expanded to clarify reference to narrow range instrument. The clarification of the high and low water level alarm input should not alter overall conclusions in the SER (7.5.2).	The FSAR 6.2.7.5 does not clearly reflect the suppression pool level instrumentation, i.e., which instrument provides high and low level alarms. Narrow range instrumentation not described. Arrangement of sensors requires clarification.
85	131	26	Second column line is an editorial error. There can be only one location for a single hose station. Area is provided necessary fire protection measures. No impact on SER overall conclusions.	FSAR Figure 9.5-4 incorrectly lists a second column line for a single hose station.
94	809	<u>250 38</u>	(Evaluation of item under review.)	FSAR 7.1.2.c.22 does not fully describe methods used for providing thermal overload protection to MOV's.
112	234	3A	The FSAR discussion should be expanded to clarify	
		ne NS reference to narrow range instrument. The		the suppression pool level instrumentation, i.e., which instrument provides high and low level alarms. Narrow range instrumentation not described. Arrangement of sensors requires clarification.

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Page 1 of 2

W3sd1

				INCONSISTENCIES: FSAR vs. AS-BUILT I	PLANT . Page 2 of 2
NOTE	TSPS	# P	RIORITY	SAFETY SIGNIFICANCE	COMMENTS
154	819		38	By MP&L/Bechtel evaluation, the key issue is that prompt readout of seismic information is provided in the control room. The current design, with analyzers, meets this requirement. The SER overall conclusions are not impacted.	FSAR Table 3.7-17 incorrectly describes' certain seismic instrumentation. The as-built plant has response spectrum analyzers not recorders.
155	818	<u>cso</u>	<u>38</u>	Barriers such as these are considered acceptable based on MP&L/Bechtel evaluation of BTP CSB 6-3. The omission of the discussion of the use of blind flanges and rupture discs does not impact the overall SER conclusions (SER 6.2.2).	FSAR does not indicate that blind flanges and rupture discs are used in secondary containment boundary (FSAR 5.2.3.2).
<u>158 306 CSB 1</u>		<u>18</u>	Categories "a" through "f" include discrepancies which are purely editorial, dealing with information or changes to information which do not bear significantly on the overall acceptance of the plant's containment isolation provisions.	Numerous corrections and clarifications proposed to FSAR Table 6.2-44, "Containment Isolation Valves." The items fall into the following categories: a) Penetration sizes incorrect or not - indicated in Table.	
					 b) Divisional power supply incorrectly. labeled.
					c) Valves incorrectly labeled as inboard or outboard.
					d) Direction of flow in line incorrect.
					e) Footnotes no longer referenced in Table should be deleted.
					f) Valve position under certain circumstances not expressed consistently throughout Table (e.g., "Closed" vs. "fail closed").
				(Justification for Category "g" changes under review)	g) Isolation signals of some valves listed incorrectly.
42-42					Rev. 3, 4/11/84

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W3sd2

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Enclosure 2

INCONSISTENCIES: FSAR v. As-Built Plant

Item 74 & The FSAR 6.2.7.5 does not clearly reflect Item 112 the suppression pool level instrumentation, i.e., which instrument provides high and low level alarms. Narrow range instrumentation not described. Arrangement of sensors requires clarification.

Comments:

The description of the problem as stated by MP&L is correct. The FSAR does need updating for this purpose. However, we have reviewed the current TS associated with suppression pool level instrumentation. The current TS match the as-built plant design. The LCO and surveillance requirements associated with the instrumentation are correct and the values listed for the high and low level alarms are consistent with the initial conditions assumed in the accident analyses.

Item 94

FSAR 7.1.2.c.22 does not fully describe methods used for providing thermal overload protection to MOVs.

Comments:

The correct reference should be FSAR 7.1.2.6.22. While that portion of the FSAR does not fully describe the thermal overlaod protection being used at Grand Gulf, the thermal overload methods actually being used have been reviewed and evaluated by PSB and are in conformance with RG 1.106, "Thermal Overload Protection for Electric Motors on Motor-Operated Valves. The FSAR will need to be updated.

tem 155 FSAR does not indicate that blind flanges and rupture discs are used in secondary containment boundary (FSAR 6.2.3.2)

Comments:

The uses of blank flanges and rupture discs in the secondary containment boundary are consistent with the acceptance criteria of SRP 6.2.3, "Secondary Containment Functional Design." The FSAR will need to be updated.

Item 306 Numerous corrections and clarifications proposed to FSAR Table 6.2-44 "Containment Isolation Valves." The items fall into seven categories shown as items a through g on Enclosure 1.

All of the items in this category are correct with respect to the TS and the as-built plant. During the period 08/83 through 10/83 CSB reviewd and evaluated all of the proposed changes. The TS have been modified to reflect CSB's evaluation. The FSAR table will need to be updated.

ENCLOSURE 4