ENTERGY

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Grand Gulf Nuclear Station

February 13, 1992

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Report No. 50-416/91-23
dated January 17, 1992 (GNRI-92/00012)

GNRO-92/00018

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/91-23-01.

Yours truly,

WTC/RR:cg
attachment

cc: Mr. D. C. Hintz (w/a)
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Notice of Violation 91-23-01

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained for surveillance and test activities of safety related equipment.

Contrary to the above procedure 06-ME-1M61-V-0001, Local Leak Rate Test, was inadequate in that no provisions were provided to install or remove a protective tube plug in a check valve associated with the drywell airlock prior to or during periodic testing of the airlock.

I. **Admission or Denial of the Alleged Violation**

Entergy Operations, Inc. admits to this violation.

II. **The Reason For the Violation, If Admitted**

On November 19, 1991 following an automatic scram, plant personnel attempted to enter the D/W personnel airlock. Entry was prevented by a differential pressure (dp) across the outer door (containment-side door). The door interlock actuates at 2 psid. Using calibrated test equipment, the internal pressure of the airlock was determined to be 40 psig, which is greater than the airlock's design pressure (30 psig). See Voluntary LER 91-014 (GNRO-91/00194) for details on this event.

Upon investigation of the cause of the overpressurization, personnel discovered a plug installed in the inlet port of the outer equalizing valve (EV). The EV appears to have been plugged since construction. The EV is the only means of relieving internal pressure in the D/W airlock. The plugged inlet port allowed pressure to increase without a relief function during plant operation.

Neither the potential for overpressurization of the airlock or presence of the relief function was realized by plant personnel. Identified differences in the design of the D/W and containment airlocks led to a misinterpretation of the D/W airlock design. Therefore, the relief function was never required to be tested by plant procedures.

III. The Corrective Steps Which Have Been Taken and the Results Achieved

A. A Material Nonconformance Report was written to document the condition and initiate an evaluation of the airlock. Based on the evaluation of the D/W airlock overpressurization, it has been determined that the condition did not adversely affect the structural integrity or functionality of the airlock. The results of the evaluation revealed that with an internal pressure of 40 psig, in combination with the design basis loading, the airlock components remained within the code allowable limits.

B. The plant surveillance procedure, which governs leak rate testing, has been revised to include provisions for installation and removal of a protective tube plug for the D/W airlock relief valve.

C. The weekly Operations surveillance procedure used to verify airlock accumulator pressures has been revised to require internal barrel pressure readings from the local airlock indications.

IV. The Corrective Steps Which Will Be Taken To Preclude Further Violation

A new test will be added to existing procedures to verify the relief valve on all airlocks which will relieve internal pressure.

V. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by April 17, 1992.