



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

August 2, 1984

NUCLEAR LICENSING & SAFETY DEPARTMENT

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 & 50-417
License No. NPF-13
File: 0260/L-860.0
Supplemental Information,
Request for Exemption in
Accordance with 10 CFR
50.12(a) - Division I, II,
III Diesel Generators
AECM-84/0390

In letter to the NRC, dated July 28, 1984 (AECM-84/0399), Mississippi Power & Light Company (MP&L) requested exemption from 10 CFR 50, Appendix A, Criterion 17 (GDC 17). In discussions held with your staff on August 1, 1984, MP&L was requested to provide additional information in support of that request. That information is provided in this letter. In addition, to the extent that MP&L's position or the exemption sought, as presented in AECM-84/0399, lacked clarity, this following discussion is provided.

EXEMPTION SOUGHT

As clarification to the MP&L letter dated July 3, 1984, MP&L commits to implement necessary design changes to conform with the NRC requirements in the subject areas discussed in that letter by startup from first refueling outage. To the extent that the current design does not comply fully to the latest NRC requirements applied to GGNS, MP&L requests a partial, scheduler exemption from GDC 17 as discussed in AECM-84/0399 for items II.C, D, and E.

ADDITIONAL INFORMATION

Section II of the attachment to that letter was divided into subsections addressing particular exemptions of which three are specifically addressed in this letter:

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PDR ADOCK 05000416
P PDR

Member Middle South Utilities System

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MISSISSIPPI POWER & LIGHT COMPANY

AECM-84/0399

Attachment

Section Number

| <u>Item</u> | |
|--|------|
| HPCS Diesel Generator Undervoltage Protection | II.C |
| Division 3 Emergency Generator Test Mode Emergency Override | II.D |
| Diesel Generator Trip Functions | II.E |

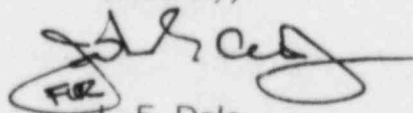
With regard to exemption II.C and II.D, both are required for the HPCS diesel generator. The first exemption, II.C, deals with an additional level of undervoltage protection, whereas II.D involves test mode emergency override. The HPCS diesel generator supplies standby electrical power to the HPCS pump and auxiliary loads to support HPCS operation. The HPCS pump is a high pressure system required for reactor coolant makeup for small break loss of coolant accidents (LOCA) where reactor pressure is maintained. As indicated in our previous submittal, substantial protective features currently exist for HPCS diesel generator protection. In addition, the likelihood of a small break LOCA coincident with loss of offsite power and failure of the HPCS diesel generator due to a lack of these additional protective features during the first cycle of operation is extremely small. If the HPCS system should fail (due to a postulated single failure or due to a failure associated with a lack of the additional protective features) the RCIC system is available for such small breaks to provide high pressure core makeup and, if necessary, the automatic depressurization system would reduce reactor pressure to allow low pressure Emergency Core Cooling Systems to provide makeup.

With regard to exemption request II.E for the Divisions 1 and 2 Diesel Generator Trip functions, the low lube oil pressure trip (which is not bypassed during an accident) utilizes coincident (2 out of 3) logic and therefore requires no exemption to comply with current regulations. As indicated in our previous exemption request, the likelihood of a failure of the generator ground overcurrent trip function which would cause a trip of the diesel generator when it is required is small. The likelihood of such a trip coincident with a loss of offsite power and a loss of coolant accident during the first cycle of operation is extremely small.

This supplemental information, in conjunction with our previous submittals, fully supports MP&L's request for a scheduler exemption to GDC 17 and provides the basis for the conclusions that there will be no undue risk to the public during the first cycle of GGNS operation without these design features.

If additional information is required, please feel free to contact us.

Sincerely,



L. F. Dale

Director, Nuclear Licensing & Safety

LFD/sad

cc: (See Next Page)

MISSISSIPPI POWER & LIGHT COMPANY

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cc: Mr. J. B. Richard
Mr. R. B. McGehee
Mr. N. S. Reynolds
Mr. G. B. Taylor

Mr. Richard C. DeYoung
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