



MISSISSIPPI POWER & LIGHT COMPANY

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August 6, 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
Technical Specification
Review Program -
Information Regarding
SRO Participants
AECM-84/0395

A letter from Mr. Thomas M. Novak dated June 4, 1984 requested that Mississippi Power & Light Company (MP&L) provide additional information regarding review assignments and responsibilities for the Grand Gulf Nuclear Station (GGNS) Senior Reactor Operators (SRO's) who approved plant startup and who also participated in the Technical Specification Review Program (TSRP). The letter also requested a description of steps taken during the TSRP to ensure the review was conducted in a competent manner. This letter provides MP&L's response to the referenced Nuclear Regulatory Commission (NRC) letter.

During the TSRP, Mr. Wayne Russell and Mr. Clark Stafford, holding active SRO licenses for GGNS Unit 1, were members of the Onsite Review Team (ORT). The ORT was part of the NSSS/BOP Technical Specification review group in the TSRP organization. General Electric (GE) and Bechtel were active participants in the local review organizations (LRO) for assigned NSSS/BOP portions of the Grand Gulf Technical Specifications (GGTS). Results of the LRO reviews were presented to the ORT. The ORT membership consisted of either the NSSS Manager or the BOP Manager, as appropriate, to the review presentation, an SRO representative, and a Nuclear Plant Engineering (NPE) representative. The ORT was to provide a critical review of the NSSS/BOP LRO results and provide a forum for the SRO and NPE representatives to introduce comments stemming from their areas of expertise and responsibility. The SRO's major contributions in the TSRP were to ensure the GGTS were internally consistent, operationally feasible, and consistent with the as-built plant. Neither Mr. Russell or Mr. Stafford had any direct or substantial involvement in the preparation and review of the GGTS which were issued as Appendix A to the Operating License on June 16, 1982. During fuel loading and low power startup testing Mr. Russell served on shift as a Shift Superintendent; Mr. Stafford, then holding an RO license, was on shift as a Reactor Operator.

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The Review, Prioritization and Direction (RPD) group in the TSRP organization was responsible for the final review of all the results emerging from the NSSS/BOP groups, the Administrative group, and the Radiological and Environmental Technical Specification (RETS) group. The RPD group had two review committees who divided between them the LRO results review responsibilities. Two former GGNS Unit 1 SRO's, Mr. Gil Johnson and Mr. Roy Keeton (both of whom had served previously as Operations Superintendent), served on these RPD review committees. Also serving on these committees were engineering and licensing personnel including two individuals who formerly held SRO licenses at another operating BWR. Neither Mr. Johnson or Mr. Keeton had substantial involvement in the preparation and review of the GGTS as initially issued with the Operating License.

The TSRP was carefully conceived and executed to ensure the review was conducted in a competent manner. The TSRP had several key program requirements which were established and met:

- o All key review program positions were filled by MP&L personnel;
- o The TSRP Manager reported directly to the Senior Vice President - Nuclear;
- o GE and Bechtel expertise was integrated into the TSRP;
- o Review activities were conducted and controlled in accordance with definitive, approved procedures;
- o The review and review results were thoroughly documented and are part of permanent plant records;
- o All findings were evaluated for safety significance, discussed with the NRC and resolved;
- o MP&L's Quality Assurance Organization audited the TSRP;
- o The TSRP was subject to upper management scrutiny. Daily progress reports were submitted; weekly management review meetings were held with the Senior Vice President - Nuclear and the President;
- o The Safety Review Committee (SRC) was briefed on the TSRP and results;
- o The Plant Safety Review Committee (PSRC) and SRC reviewed and approved all GGTS changes resulting from the review.

Confirmatory actions were taken by MP&L management to provide additional assurance that the TSRP was a complete and effective review:

- o Impell performed a third party review of the TSRP (see MP&L letter AECM-84/0235);

- o Bechtel and GE compared the technical specifications of Kuosheng, the prototype BWR6/Mark III containment plant, with GGNS to identify key design features which might be missing from GGTS (see MP&L letter AECM-84/0329).
- o Bechtel and GE performed a BWR6/Mark III unique features review by comparing GGNS designs with the Hanford 2 BWR5/Mark II design again looking for possible missing design features in GGTS (see MP&L letter AECM-84/0274);
- o Bechtel and GE reviewed GGNS FSAR Chapter 15 accident analyses to ensure they were properly reflected in GGTS (see MP&L letter AECM-84/0274);
- o GE performed an overview review of the MP&L and Bechtel-reviewed portions of the GGTS to confirm those reviews were complete.


Additional detailed information on the TSRP has been provided to the NRC in:

- o AECM-84/0183 (March 18, 1984)
- o AECM-84/0217 (April 9, 1984)
- o AECM-84/0229 (April 19, 1984)
- o AECM-84/0274 (July 5, 1984)
- o AECM-84/0344 (July 5, 1984)

These letters provide discussions of program objectives, requirements, procedures, review processes, handling of results, and conclusions based on the results.

In conclusion, the TSRP was a thoughtfully conceived and competently executed review. The review used qualified, experienced personnel operating within a dedicated, strictly controlled organization. The review process and review results were thoroughly audited and subjected to several confirmatory activities which validated the effectiveness of the review.

Sincerely,



L. F. Dale
Director, Nuclear Licensing & Safety

CLT/JGC/sad

cc: (See Next Page)

MISSISSIPPI POWER & LIGHT COMPANY

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