



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

August 11, 1984

J. B. RICHARD
SENIOR VICE PRESIDENT - NUCLEAR

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

Attention: Mr. T. M. Novak, Assistant Director

Dear Mr. Novak:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
License No. NPF-13
File: 0260/L-390.0
Proposed License Amendment 13
AECM-84/0424

This letter responds to your August 8, 1984 letter requesting that Mississippi Power & Light Company (MP&L) review the proposed Amendment 13 to the Grand Gulf Nuclear Station (GGNS) License No. NPF-13. Based on the review conducted, MP&L concludes that schedules identified are consistent with our previous commitments. In addition, the following three comments on the proposed amendment are provided:

1. Item 2.C of the proposed amendment regarding License Condition 2.C.(11): The modification proposed to 2.C.11.c would permit qualifying the equipment by test only. Past MP&L correspondence has indicated that the qualification would be performed alternately by analysis (AECM-82/0128, dated April 5, 1982). Qualification by analysis was selected due to the size of the subject equipment. A later MP&L letter (AECM-82/0190, dated May 24, 1982) indicated, in error, that qualification would be by testing. Nevertheless, it was MP&L's intent to qualify this equipment by analysis, primarily for the reason stated above. These components have been qualified by analysis, and the results are currently undergoing MP&L review. Accordingly, it is suggested that Amendment 13 be changed from "shall qualify by test" to "shall qualify by analysis."
2. Item 2.F of the proposed amendment regarding License Condition 2.C.(19): Based on our review of proposed changes to the technical specifications, MP&L concludes that the restrictions of the current license condition have either been resolved or have been incorporated in the changes to the GGNS Technical Specifications (Specification 3.6.2.7) of the full power amendment to the operating license. This item proposes a license condition which should replace the existing condition. Amendment 13 should, therefore, indicate that license condition 2.C.(19) is hereby "modified to read as follows:" instead of "modified to add the following."

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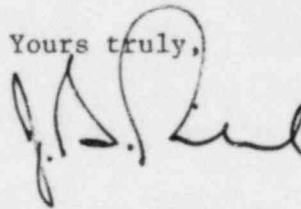
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3. Operation with partial feedwater heating (not addressed in proposed Amendment 13): Currently, License Condition 2.C.(41) regarding partial feedwater heating, prohibits operation in this mode pending submittal of analyses which justify that operation with partial feedwater heating would not result in a more limiting change in minimum critical power ratio than that obtained with normal feedwater heating. This condition is overly restrictive when compared with the discussion of the concern in Section 15.1 of the SER and Supplement 2. In these discussions the restriction was intended to prohibit the use of partial feedwater heating to extend the cycle beyond the normal end-of-cycle condition. As written, the license condition would prevent the operations needed to bring the turbine on-line and, in addition, could require immediate shutdown in the event of any loss of feedwater heating. To render the operating license more consistent with the NRC staff SER and SSER-2, MP&L proposes a revision to Paragraph 2.C.(41) to read as follows: "Operation of the plant in the partial feedwater heating mode for the purpose of extending the normal fuel cycle shall be prohibited until analyses which justify that operation are provided to and approved by the NRC staff."

We appreciate this opportunity to review the proposed amendment. If further clarification is required, please contact this office.

Yours truly,



JBR:lm

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

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