



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

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NUCLEAR LICENSING & SAFETY DEPARTMENT

U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N.W., Suite 2900  
Atlanta, Georgia 30323

Attention: Mr. J. P. O'Reilly, Regional Administrator

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-13  
File 00162/15524/15521  
Report No. 50-416/84-16,  
dated June 14, 1984  
(MAEC-84/0234)  
AECM-84/0364

This is in response to your letter to Mississippi Power & Light Company from Richard C. Lewis, dated June 14, 1984.

Attached are the responses to the Notice of Violation and Notice of Deviation enclosed with the letter.

The responses individually address the concern expressed in the letter; i.e., improvement of the effectiveness of our program and implementation of management control systems. In addition, Attachment 7 specifically addresses improvements relative to training, qualification, and certification. Further, a reorganization of the Nuclear Production Department was implemented in May to strengthen the department, clarify organizational functions, and to improve the effectiveness of management and controls.

Should you have any questions, please contact my office.

Yours truly,

*for* L. F. Dale  
Director

RLS/SHH:lm  
Attachments

cc: (See Next Page)

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## MISSISSIPPI POWER &amp; LIGHT COMPANY

cc: Mr. J. B. Richard (w/a)  
Mr. R. B. McGehee (w/o)  
Mr. N. S. Reynolds (w/o)  
Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/a)  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

## NRC VIOLATION 50-416/84-16-01

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. However, this violation had no effect on the health and safety of the public.

II. REASONS FOR THE VIOLATION IF ADMITTED

FSAR Chapter 13, Section 1, paragraph 13.1.2.2.3.1 provides contradicting information in regard to the responsibility of releasing plant equipment.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Safety and Environmental Evaluation 079/84 was performed for the noted deviation in Plant Administrative Procedure 01-S-06-1. This evaluation provided that the change did not affect the safety analysis as described in the FSAR or reduce the margin of safety in the Technical Specifications.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

FSAR Chapter 13, Section 1, will be rewritten to clarify the responsibility for releasing plant equipment.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MP&L currently anticipates submittal of an FSAR Amendment in September, 1984, that will clarify responsibility for tagging and releasing plant equipment.

## DEVIATION 50-416/84-16-02

I. DESCRIPTION OF CORRECTIVE ACTION REGARDING THE DEVIATION

ANSI 18.1 certifications have been provided for contract maintenance craft personnel.

Administrative Procedure 01-S-07-33 has been developed establishing the programmatic controls that contract maintenance personnel meet the requirements of ANSI 18.1 prior to being certified to performing work on safety-related equipment. Additionally, the controls established in this program address the certification process of contract personnel working on equipment described in the FSAR.

II. ACTION TAKEN TO AVOID FURTHER DEVIATION

Administrative Procedure 01-S-07-1, "Control of Work on Plant Equipment and Facilities," will be revised. This revision will establish that the maintenance supervisor is responsible for reviewing each work activity to determine whether special training or direct supervision is required for craft personnel performing the special work.

III. DATE WHEN ACTIONS WERE OR WILL BE COMPLETED

The "Qualification and Certification Program" was implemented on June 25, 1984. Full compliance with the program will be achieved December, 1984.

## NRC VIOLATION 50-416/84-16-03

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. However, this violation had no effect on the health and safety of the public.

II. REASONS FOR THE VIOLATION IF ADMITTED

MP&L failed to recognize the need to establish a program for handling the qualification and certification of contract personnel.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Plant Administrative Procedure 01-S-07-33 has been developed to delineate the requirements for the qualification and certification of contract personnel. Specifically, this procedure addresses the use of ANSI 18.1 certification for maintenance contract personnel.

ANSI 18.1 certifications have been provided for contract maintenance craft personnel.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

MP&L considers the establishment of the programmatic controls in Plant Administrative Procedure 01-S-07-33 sufficient to prevent further violation.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on June 25, 1984.

## NRC VIOLATION 50-416/84-16-04

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. However, this violation had no effect on the health and safety of the public.

II. REASONS FOR THE VIOLATION IF ADMITTED

MP&L failed to have in place programmatic controls which address the minimum training requirements necessary for maintenance craft personnel prior to performing work on plant equipment. Additionally, the training procedures noted in the report were being misinterpreted as establishing the certification requirements for maintenance craft personnel when in fact they only established the training course necessary to be certified.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Plant Administrative Procedure 01-S-07-33 has been developed detailing the requirements necessary for certification of maintenance craft personnel prior to performing work on safety-related systems. The controls established in this procedure clearly delineate the criteria and responsibility for evaluation of equivalent experience and provide for the documentation of training and experience in the certification process.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

MP&L considers the establishment of the programmatic controls in Plant Administrative Procedure 01-S-07-33 sufficient to prevent further violation.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIVED

The "Qualification and Certification Program" was implemented on June 25, 1984. Full compliance with the program will be achieved December, 1984.



## NRC VIOLATION 50-416/84-16-05

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the violation that an audit was not performed to the depth necessary to assure training was being effectively implemented.

II. REASONS FOR THE VIOLATION IF ADMITTED

The scope of the audit (MAR-84/0035) was limited to determining personnel qualifications based on the demonstrated ability to perform a specific activity. The audit report inadequately described and improperly documented the observed activity. Inadequate management direction was given to the auditors which resulted in an audit checklist that did not contain specific accept/reject criteria with regard to indoctrination and training of personnel. QA failed to recognize the requirement for ANSI N18.1 certification for contract personnel.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. The Director, Quality Assurance (DQA) interviewed the auditors and the Manager, Nuclear Site Quality Assurance (MNSQA) to determine the direction given for this audit.
2. A review was performed of 1984 Site QA audits of the training area to determine extent, perform evaluations of results, and provide any necessary corrective actions. Fifteen audits were identified which had examined some aspect of training and three were found to warrant supplemental information for clarification purposes. Audit report supplements were performed.
3. Audit report (MAR-84/0035) was reviewed and a letter of clarification was written to the General Manager explaining the scope, intent, methodology and results of the audit in order to preclude any misconceptions regarding maintenance craft qualifications.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

1. The DQA has reinstructed the MNSQA regarding strict procedural adherence and directions given to auditors.
2. Detailed instructions have been given to all assigned site auditors to reinforce the need for thorough and accurate descriptions of the audit process.
3. Training has been provided to all assigned site auditors concerning the applicability of ANSI N18.1 certification to unit staff as described in FSAR 13.1.3.1 and Technical Specification 6.3.1.

NRC VIOLATION 50-416/84-16-05 (Cont'd)

4. The MNSQA has developed and implemented an audit peer-review scheme to further reinforce audit requirements and assure compliance. This review was performed at a 100% level through June, 1984. The results are being summarized and trended, and identified weaknesses, if any, will be corrected. These actions are designed to improve the effectiveness of our audit program.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All actions have been completed with the exception of the summarization and trending of the results of the peer-review scheme. This is tentatively scheduled for completion by July 31, 1984.



## NRC DEVIATION 50-416/84-16-07

I. DESCRIPTION OF CORRECTIVE ACTIONS

1. Immediate action was taken to review all NPE initiated 10 CFR 50.59 evaluations on Design Change Packages, Material Nonconformance Reports, and Change Notices performed since March 20, 1984; and, these evaluations were forwarded to the Plant Safety Review Committee (PSRC) for review. These actions were completed June 18, 1984.
2. NPE Document Control was instructed to send, and is now sending all 10 CFR 50.59 evaluations performed since June 18, 1984 to the PSRC.

II. ACTIONS TAKEN TO AVOID FURTHER DEVIATIONS

1. NPE Administrative Procedures 01-303, "Evaluation of Changes to Nuclear Plant Engineering Issued Design"; 01-304, "Performance of Design and Preparation of Design Change Packages"; and 01-801, "Processing of Nonconformance Reports" are being revised to ensure that all safety evaluations performed are reviewed by the PSRC.
2. Until the revisions to the procedures are issued, Administrative Procedure Change Requests (APCRs) are being developed to require that safety evaluations be sent to the PSRC.

III. DATES WHEN ACTIONS WERE OR WILL BE COMPLETED

1. NPE expects to issue the APCR's and perform related training of NPE personnel prior to July 20, 1984.

Violations 50-416/84-16-03, 50-416/84-16-04, and Deviation 50-416/84-16-02 address the major topics of MP&L's lack of controls in the area of qualification and certification of maintenance personnel and the use of qualified and certified contract personnel who perform maintenance activities on safety-related equipment. In MP&L's response addressing corrective actions which MP&L has taken to correct and prevent further violations of this nature, we have established a single administrative control program. This program addresses the requirements and training for qualification and certification of maintenance section personnel, including contract personnel. This program establishes the minimum qualification that personnel must have prior to being assigned to specific positions in the maintenance section.

Specifically, the program addresses:

- o The documentation of education, training, and experience of an individual to ensure he meets the minimum requirements of his required position; and, requires documentation that the requirements of ANSI 18.1 are met.
- o Establishes the requirements that the discipline maintenance superintendent has the responsibility for certification of his personnel and the responsibility of assuring that only certified personnel are permitted to perform independent safety-related work.
- o Addresses the relationship and interface of MP&L training procedures.

MP&L considers the controls which are discussed above and implemented in our Administrative Procedure 01-S-07-33, "Qualification and Certification of Maintenance Section Personnel," sufficient to prevent the type of violations and deviation noted in IE Report 50-416/84-16.