



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

August 29, 1984

MEMORANDUM FOR: Richard C. DeYoung, Director
Office of Inspection and Enforcement

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: FALSE STATEMENTS IN GRAND GULF TECHNICAL
SPECIFICATION CHANGE REQUESTS

In accordance with the request in your August 2, 1984, memorandum, the NRR staff has looked at licensee's submittals regarding the Grand Gulf Technical Specifications for possible material false statements. The staff has considered only licensee's submittals made after June 16, 1982, the date the license was issued, and only those submittals addressing technical specifications. The staff, however, was not able to conduct a detailed search in the time allotted. This review largely reflects prior knowledge of the content of the submittals and reflects only a two week effort. However, even with the limited review, we believe that these examples are representative of the types of errors that would be found in a more detailed search.

The results of the staff review are given in the enclosure to this memorandum. In each case, the false statement is identified as one of commission or one of omission, the applicable documents are identified, and the reason the statement was false is given. For false statements by commission, the reason the statement was material - i.e., could have influenced a reasonable agency reviewer - is also given. For false statements by omission, the omitted information would have been incorporated into Technical Specification changes but it would not have otherwise affected them. Also, we believe that in either case - commission or omission - the safety significance of these errors is low.

It may be noted from the enclosure hereto, that all except one of the false statements were found in licensee letters requesting changes prior to September 1983. This period was prior to licensee's initiation of a comprehensive Technical Specification Review Program. During the Technical Specification Review Program (February - June 1984), submittals requesting changes to Technical Specifications were made only after thorough discussions with the staff, including technical reviewers. In these discussions a thorough understanding was achieved of the systems under consideration and the necessary changes to the Technical Specifications. The subsequent letters requesting changes to Technical Specifications were, therefore, relatively free of discrepancies or errors. The staff, in its review of submittals since completion of the Technical Specification Review Program, found only one potential false statement.

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HR Denton
Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
As stated

DESIGNATED ORIGINAL

Certified By *[Signature]*

ENCLOSURE

IDENTIFICATION OF STATEMENTS

1. MP&L Submittal: Item 26, March 24, 1983 Letter

False statement by commission

The fuel-grapple-not-full-up interlock has been deleted from the GGNS design.

Reason statement was false

Through Amendment 58 to the FSAR dated May 18, 1984, FSAR Section 7.6.1.1.3.1 indicates that four refueling interlock circuits sense the condition of the refueling equipment and control rods. One of these, Item (c) of 7.6.1.1.3.1, is fuel-grapple-not-full-up. Inasmuch as the FSAR reflects the GGNS design, either the statement provided in the 3/24/83 submittal is false or the FSAR contains a false statement.

Reason statement was material

If the design does not include a particular feature, a reasonable reviewer will usually not require a design change and will consider alternate specifications to achieve the safety objective.

2. MP&L Submittal: Item 9, April 7, 1983 Letter

False statement by omission

The Technical Specifications for the diesel generators start time was requested to be changed from 13 seconds to 10 seconds. The change was issued in Amendment No. 7.

Reason statement was false

This change reflects a false statement by omission because when this change was proposed, the licensee omitted associated changes to Table 3.3.2-3, "Isolation System Instrumentation Response Time." The response times in the table have now been requested to be changed from 13 to 10 seconds by letter dated June 22, 1984. This change is planned for Amendment 13.

Reason statement was not material

The error was not material because it did not influence a staff reviewer and was found in a subsequent review.

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3. MP&I Submittal: Item 5, April 25, 1984 Letter

False statement by commission

The design of the differential pressure valves in these systems precludes position verification.

Reason statement was false

Based on manufacturer's data, the valves do have a trip indicator which could readily be verified. Inasmuch as verification could be performed, the statement provided on 4/25/83 was false.

Reason statement was material

The false statement could have influenced a reasonable reviewer not to include verification of valve position in Technical Specifications and unnecessarily to consider alternate methods of achieving the safety objective.

4. MP&L Submittal: Item 6, April 25, 1984 Letter

False statement by omission

Plant as-built drawings and inspection of hose station locations confirm that the proposed changes to Technical Specification Table 3.7.6.5-1 will correctly reflect the location of these hose stations. (Granted in Amendment 7).

Reason statement was false

By letters dated September 9, 1983, and June 18, 1984, four additional hose stations have been requested to be added. These changes are planned for Amendment 13. The statement provided on 4/25/84 was false in that it omitted these four stations.

Reason statement was not material

The error was not material because it did not influence a staff reviewer and was found in a subsequent review.

5. MP&L Submittal: Item 12, June 14, 1983 Letter

False statement by commission

There is no automatic transfer from the normal to alternate circuit since this bus search and automatic transfer feature was deleted from the load

shedding and sequencing (LSS) panel by a pre-operating license design change. Section 8.3 of the FSAR no longer contains a description of the bus search and automatic transfer feature of the LSS panel.

Reason statement was false

At the time of the above submittal, Section 8.3 of the FSAR read as follows: "Should the bus voltage (offsite source) be lost during post-accident operation, shedding and searching for an alternate power source will occur as described below. Once voltage is restored, the LOCA sequencing procedure will repeat itself with respect to starting motor loads."

In FSAR Amendment 57, the automatic transfer was more accurately described, but the LSS panel functions were not described. As has been described to the staff, the LSS panel still performs a search and automatic transfer function. It is prohibited from auto-transfer hookup to another off-site power source by other features. Therefore, the statement given in the submittal of 6/14/83 is false.

Reason statement was material

The false statement could have influenced a reasonable reviewer to not consider Technical Specifications for additional features which are in the as-built plant.

6. MP&L Submittal: Item 14, June 14, 1983 Letter

False statement by commission

As part of the proposed Technical Specification change, the composition of the Safety Review Group was revised as follows: "the Manager of Systems Nuclear Operations, Middle South Services, will be replaced by a qualified representative of System Nuclear Operations."

Reason statement was false

When questioned about the qualifications of the replacement, the licensee admitted that the organizational entity, System Nuclear Operations, did not exist. An appropriate change was made in a later submittal.

Reason statement was material

Reviewer would have no way of knowing "Systems Nuclear Operations" did not exist and, therefore, would not know there was no qualified person from that unit available.

7. MP&L Submittals: Item 2, June 23, 1983 Letter and Item 14, August 1, 1983 Letter

False statement by commission

ANSI N510-1975 does not address heat dissipation testing of the heaters.

Reason statement was false

Heat dissipation testing of duct heaters is performed with electrical current passing through the heaters. ANSI N510-1975, Section 14.2.3, is titled, "Power-On Electrical Tests," and applies fully to the heat dissipation tests.

Reason statement was material

A reasonable reviewer would not require the provisions of the ANSI standard to be addressed if the standard is not applicable to the heater.

8. MP&L Submittal: Item 14, June 23, 1983 Letter

False statement by commission

The present "*" note on Table 4.3.7.5-1 does not apply to the instruments being used at Grand Gulf and should be deleted.

Reason statement was false

The footnote fully applied to the Grand Gulf instruments and has been retained through the planned Amendment 13 to Technical Specifications. Therefore, the licensee's statement as submitted above was false.

Reason statement was not material

The statement was not material because it did not influence staff to delete the note.

9. MP&L Submittal: Item 8, August 1, 1983 Letter

False statement by commission

This submittal concerns fire protection spray/sprinkler systems. In Section 3.7.6.2, the Control Building system at 93' (elevation) was identified as NIP64D140.

Reason statement was false

By letter dated June 18, 1984, licensee requested correction of the identification of the above system to NSP64D140. The "S" in the designation indicates it is shared between Units 1 and 2. Therefore, the 8/1/83 submittal, which was incorporated into their Technical Specifications, contained a false statement.

Reason statement was not material

The error was not material because it did not influence a staff reviewer and was found in a subsequent review.

10. MP&L Submittal: August 5, 1984 Letter

False statement by omission

By the August 5, 1984, letter, Mr. Richard, Sr. Vice President - Nuclear, MP&L, certified that, considering changes through proposed Amendment 13, to the best of his knowledge, the Grand Gulf Technical Specifications transmitted to him on August 3, 1984, accurately reflected the plant, the FSAR and supporting documents and the SER, in all material respects.

Reason statement was false

By letter dated August 14, 1984, licensee requested additional changes to the Technical Specifications to add circuit breakers to the list of those circuit breakers requiring surveillance. Since the Technical Specifications, considering proposed Amendment 13, did not include these circuit breakers, they did not accurately reflect the plant.

Reason statement was material

The false statement could have influenced a reasonable reviewer to conclude that the Technical Specifications were complete. Therefore, no further review effort would be required.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FROM: RICHARD DEYOUNG

ORIG. DUE DATE: 08/16/84

TICKET NO: 849257

TO: DENTON

DOC DATE: 08/02/84

NRR RCVD DATE: 08/03/84

** YELLOW **

FOR SIGNATURE OF: DENTON

DESC:

CC:

GRAND GULF TECHNICAL SPECIFICATIONS

CASE/DENTON
PPAS

REFERRED TO: DL DATE: 08/03/84

CONTACT: EISENHUT

NOVAK

8/6/84

Adewam

R'd 8/7/84

PLEASE REVIEW THE DUE DATE IMMEDIATELY:

IF THE DUE DATE DOES NOT ALLOW ADEQUATE TIME TO RESPOND TO THIS TICKET, YOU MAY REQUEST A REVISED DUE DATE. THE REQUEST MUST INCLUDE A VALID JUSTIFICATION AND BE MADE THROUGH YOUR CORRESPONDENCE COORDINATOR TO THE NRR MAIL ROOM (KAREN BOWMAN OR HAZEL SMITH)

REQUESTS FOR REVISION OF YELLOW TICKET DUE DATES MAY BE MADE, WITH JUSTIFICATION, THRU THE WEEKLY WITS UPDATE UP TO ONE WEEK AFTER ASSIGNMENT BY NRR MAIL ROOM. THE NEW DUE DATE, IF APPROVED BY NRR MAILROOM, WILL BE USED TO TRACK DIVISION CORRESPONDENCE COMPLETION SCHEDULES.

PLEASE DO NOT HAND CARRY CONCURRENCE PACKAGES TO DIRECTORS OFFICE

WITHOUT FIRST GOING THRU THE NRR MAIL ROOM.
