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November 19, 1984

NUCLEAR LICENSING & SAFETY DEPARTMENT

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
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 and 50-417
License No. NPF-29
File: 0025/L-860.0
Response to Generic Letter 83-28,
Items 2.1 and 2.2.2
AECM-84/0508

Generic Letter 83-28 requested conformance to several NRC positions derived from an evaluation of the Salem ATWS events. Attached is the MP&L response to items 2.1 and 2.2.2 of the generic letter. An interim response is provided to Part One of Item 2.1 which deals with equipment classification of reactor trip system components. A final response is provided to Item 2.1 Part Two and Item 2.2.2 which concern the vendor interface program. Responses to other items of the generic letter will be provided per the schedule discussed in MP&L letter AECM-83/0723, dated November 4, 1983.

Should you have any questions regarding this response, please feel free to contact us.

Yours truly,

S H Hobbs for

L. F. Dale
Director

AGR/SHH:vog
Attachment

cc (See Next Page)

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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

Mr. J. P. O'Reilly, Regional Administrator (w/a)
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

Action 2.1 Part One

Equipment Classification (Reactor Trip System Components)

POSITION

Licensees and applicants shall confirm that all components whose functioning is required to trip the reactor are identified as safety-related on documents, procedures, and information handling systems used in the plant to control safety-related activities, including maintenance, work orders, and parts replacement.

RESPONSE

Part One of Action 2.1 of the generic letter requires Grand Gulf Nuclear Station (GGNS) to verify that reactor trip system components are identified as safety-related on GGNS documents, procedures, and information handling systems. To accomplish this, a detailed listing of reactor trip system components is being compiled using the definition of reactor trip system provided in MP&L letter AECM-84/0723 (dated November 4, 1983). Instrument channel logics supplied in MP&L AECM-84/0093, Attachment 1 (dated May 8, 1984), and GGNS design drawings are also being utilized in this effort. The reactor trip system component listing should be complete by late December, 1984. Work will then begin to verify that the reactor trip system components listed in the Master Equipment List (MEL) are specified as safety-related and that plant procedures which cover these components identify them as safety-related. A final report on the results of this review will be provided upon completion of the aforementioned tasks.

Action 2.1 Part Two

Vendor Interface (Reactor Trip System Components)

POSITION

. . . In addition, for these components, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information is complete, current and controlled throughout the life of the plant, and appropriately referenced or incorporated in plant instructions and procedures. Vendors of these components should be contacted and an interface established. Where vendors can not be identified, have gone out of business, or will not supply the information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reactor trip system reliability. The vendor interface program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgement for receipt of technical

mailings. The program shall also define the interface and division of responsibilities among the licensees and the nuclear and nonnuclear divisions of their vendors that provide service on reactor trip system components to assure that requisite control of and applicable instructions for maintenance work are provided.

Action 2.2.2

Vendor Interface (All Safety Related Components)

POSITION

For vendor interface, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface established. Where vendors cannot be identified, have gone out of business, or will not supply information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). The program shall be closely coupled with Action 2.2.1 above (equipment qualification). The program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgement for receipt of technical mailings. It shall also define the interface and division of responsibilities among the licensee and the nuclear and nonnuclear divisions of their vendors that provide service on safety-related equipment to assure that requisite control of and applicable instructions for maintenance work on safety-related equipment are provided.

RESPONSE

Part Two of Action 2.1 and Part Two of Action 2.2 require the establishment of an ongoing vendor interface program to provide utilities with timely notification of possible conditions affecting plant safety. MP&L has evaluated the requirements of the NRC proposed vendor interface program and has concluded that the Vendor Equipment Technical Information Program (VETIP) developed by an INPO Nuclear Utility Task Action Committee (NUTAC) provides the best, most reliable framework for the dissemination of technical information throughout the nuclear industry. MP&L concurs with the Executive Summary of the VETIP report (INPO 84-010 NUTAC) that states ". . . individual utilities have the greatest experience with and are most cognizant of the application of safety-related equipment. Vendor involvement with such equipment is generally greatest during construction and initial operation of the plant. Vendors are not familiar with the surveillance or maintenance histories, nor with the application of the equipment or its environment. This type of information is most readily available at the plant level within individual utilities."

The VETIP does recognize that some vendor interfaces already exist, particularly between the utilities and the nuclear steam supply system vendors and owners' groups. MP&L maintains an ongoing interface with General Electric Company (GE) and is a member of the Boiling Water Reactor Owners' Group (BWROG). As part of the continuing interface with GE, MP&L receives Service Information Letters (SILs) concerning technical items or conditions that may be applicable to GGNS. The SILs are evaluated as part of the Onsite and Offsite Document Review procedure. The results of the evaluation and any recommendations are documented and transmitted to the appropriate MP&L organization for disposition.

In accordance with the recommendations embodied within the VETIP report on Generic Letter 83-28 Action 2.2.2, MP&L is an active participant in the INPO managed Nuclear Plant Reliability Data System (NPRDS) and Significant Event Evaluation and Information Network (SEE-IN) programs. As a participant in the NPRDS program, MP&L has submitted the required component engineering data to INPO for GGNS Unit 1 and is presently compiling failure data for MP&L engineering review. Following the engineering review for validity, the failure data will also be transmitted to INPO. This effort not only provides MP&L with improved records of component performance but also supports other utilities by expanding the industry wide data base.

The SEE-IN program provides a feedback mechanism from INPO to the utilities of potentially applicable conditions or events the utilities should be aware of. This information is transmitted in the form of Significant Event Reports (SERs), Significant Operating Experience Reports (SOERs), and Operations and Maintenance Reminders (O&MRs). MP&L has procedures in place for the receipt and evaluation of these documents. Any recommendations derived during the evaluation process are transmitted to the appropriate MP&L organization.

In addition to the above programs, safety-related vendors for GGNS are required to report to MP&L any defect potentially reportable under 10CFR21 or 10CFR50.55 (e). MP&L evaluates the potentially reportable items using approved procedures.

Generic Letter 83-28 also requires that sufficient attention is paid to equipment maintenance, replacement, and repair of components. At GGNS, maintenance of safety-related equipment is performed using approved procedures based on vendor recommendations. Appropriate quality control is applied. The procurement of replacement parts is performed using approved procedures and proper engineering review. Vendors that have an MP&L approved quality assurance program are used to supply safety-related components.

MP&L has in place a program for the control of vendor technical manuals. An engineering review is performed in accordance with NPEAP 01-302, "Design Review of Contractor Prepared Design Documents." Following the engineering review the manuals are transmitted to plant staff, where they are controlled by GGNS Administrative Procedure 01-S-05-4, "Control of Technical Manuals." This procedure establishes the mechanisms by which the manuals are distributed, maintained, revised, and used. This

procedure helps ensure that the latest revision of a given manual is available to support plant activities. In addition, Administrative Procedure, 01-S-05-12, "Directive Submittal Requirements for Plant Technical Manuals," provides a method for cross-referencing the technical manuals with the applicable plant procedures.

In conclusion, MP&L has reviewed the requirements concerning a vendor interface program and believes that the programs already in place meet the intent of the proposed vendor interface program and provide a reliable method of disseminating technical information to the industry. As such, MP&L will continue to execute the described programs. This is the final response to the vendor interface program requirements.