



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1840 JACKSON, MISSISSIPPI 39205

SEP 25 1984  
September 21, 1984

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: 15524/15521  
Report No. 50-416/84-24, dated  
August 24, 1984 (MAEC-84/0309)  
AECM-84/0455

This is in response to your letter to Mississippi Power & Light Company from Richard C. Lewis, dated August 24, 1984. Attached is the response to the Notice of Violation enclosed with your letter.

Should you have any questions, please contact my office.

Yours truly,

L. F. Dale  
Director

RLS/SHH:rg  
Attachment

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

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RESPONSE TO NRC VIOLATION 50-416/84-24-01

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. REASON FOR THE VIOLATION IF ADMITTED

1. Responsible personnel did not immediately recognize the condition as a nonconformance.
2. Adequate programmatic controls were not in place to address timely reporting, to management, nonconformances identified during the performance of an individuals assigned duties.

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

1. Training of Nuclear Plant Engineering personnel was conducted August 28, 1984. The objective of this training was to re-state the MP&L Corporate position to require rising standards of technical competence. Engineers were instructed that they must constantly be aware that solutions to technical problems cannot be based on engineering views alone, but must consider the effects on and the condition of the operating plant.
2. Nuclear Plant Engineering Administrative Procedure Number 01-201 was changed to clearly implement MP&L Operational Quality Assurance Program requirements for the initiation, adequate documentation and reporting to management of conditions adverse to quality or safety.

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

No further action is required. The training of Nuclear Plant Engineering personnel and implementation of the nonconformance reporting requirements are considered adequate to prevent recurrence.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the training conducted on August 28, 1984 and the implementation of nonconformance reporting requirements by Nuclear Plant Engineering Administrative Procedure Number 01-201 on July 3, 1984.

RESPONSE TO VIOLATION 50-416/84-24-02

Mississippi Power & Light Company (MP&L) denies this alleged violation.

The assertion that timely action was not taken relative to the concern expressed in the Bechtel letter was admitted in our response to Violation 50-416/84-24-01. However, the assertion that timely action was not taken relative to submittal of an LER is denied, in that an LER was submitted 27 days after the condition was recognized as being questionable. Further, the submittal was within 24 days following the discovery of a reportable event based on a proper evaluation of the Bechtel concern.

The "discovery" date was established as June 1, 1984, when the condition was recognized as questionable. Within 1 hour, NRC was notified in accordance with 10 CFR 50.72(b)(1), and on June 28, 1984, an LER was submitted - 3 days prior to the 30 day limit for this discovery date. This date appears consistent with the guidance provided in NUREG-1022, Supplement No. 1 - Licensee Event Report System, which states that the discovery date is the date "when someone in the plant recognizes that the event has occurred." The keyword here being "recognizes".

Also, the guidance provided in NUREG-1022, Supplement No. 1, indicates the reportability date is when someone discovers that the event is reportable. The condition was determined to be reportable in accordance with 10 CFR 21 on June 4, 1984. NRC was again notified on June 5, 1984, followed by a written report on June 8, 1984.

June 4, 1984, is the actual date of discovery of a reportable situation, following the completion of a proper evaluation of the Bechtel concern expressed in MPB-84/0197. This date is 24 days prior to the LER transmittal and within the "30 days of discovery of a reportable event or situation" as prescribed in 10 CFR 50.73(d).

MP&L considers the actions relative to the LER submittal reflect a conscientious and timely effort to report the condition and believes this alleged violation should be withdrawn.