



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

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December 31, 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: 0260/L-860.0  
Ref: T. M. Novak, NRC, letter to  
J. B. Richard, MP&L, dated  
June 26, 1984 (MAEC-84/0250)  
FSAR Update - Revised Exemption  
Request  
AECM-84/0352

In accordance with the above referenced letter, Mississippi Power & Light Company (MP&L) hereby submits a request for a temporary scheduler exemption from 10CFR50.71(e)(3)(i). Specifically, MP&L requests an extension of time until December 1, 1985 for the filing of the updated Grand Gulf Nuclear Station (GGNS) FSAR. As there is no statutory or regulatory prohibition against granting such an exemption, and good cause exists for granting it as explained below, it is authorized by law. Because no defense aspects or classified information are involved, the common defense and security are not at issue.

The bases for this exemption request were originally stated in MP&L's previous exemption request (AECM-84/0026, dated February 6, 1984). As noted therein, the primary reason for this request was and continues to be the unusually long interval between low power and full power licensing. During this interval key personnel, normally involved in an FSAR Update effort, have been participating in activities supporting full power licensing and power ascension testing of GGNS Unit 1. During this same period, several FSAR amendments and other licensing documents and correspondence have been submitted to the NRC, thus providing substantial information concerning changes to the plant design and safety analyses. In addition, as discussed with E. Adensam of your staff on December 14, 1984, in spite of the unusually long interval between the issuance of a low power operating license and the commencement of power ascension testing (operations over 5% power), the submittal schedule for the GGNS Unit 1 FSAR Update, as proposed, remains consistent with the industry average (i.e., that interval between granting of the full power license and submittal of the initial update).

As the NRC staff is aware, since GGNS was issued a low power operating license on June 16, 1982, MP&L has been working closely with staff reviewers regarding on-going design and technical specification revisions and plant

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modifications. Since that time, MP&L has submitted 3 formal FSAR amendments and numerous other licensing documents. In the areas covered by these submittals, these documents have provided the NRC with information similar to that sought in the FSAR update process.

In addition to the fact that MP&L has continued to "update" the FSAR by means of FSAR Amendments, we believe that the history and current status of the plant since the low power license was issued warrants an extension of time for the FSAR update. When the update rule was prepared and issued, the intent was to provide for relevant updated technical information within a certain time period after the plant had been operating, and then annually thereafter. For the initial update, a period of two years after receipt of the license was established by the rule. Assuming that a full power operating license is received nominally within 3 months after receipt of the initial ("low power") operating license, the rule would permit the initial FSAR Update be filed as much as 21 months later. MP&L has compiled data from a number of operating plants that received a full power operating license after the update rule went into effect. The results of this survey are shown in the table in Attachment 1. This table indicates that, for these recently licensed plants, the interval between full power operating license (commencement of power ascension testing) and the initial update submittal has averaged approximately 16 months.

In the case of GGNS, the interval between fuel load and commercial operation will be considerably longer than for most other recent plants. The reasons for this have been provided and discussed with the NRC in various other document submittals. The result of this extended schedule, however, is that if one were to maintain a consistent approach to the intent of the FSAR update process, then the submittal of the first GGNS FSAR Update could logically be extended. The December 1985 FSAR Update submittal as requested by MP&L would occur 15 months after full power licensing. This time from full power licensing to FSAR Update submittal would compare favorably with the industry average.

As discussed above, MP&L has found itself in the unusual situation of being obliged to update the GGNS FSAR at the same time that preparations for power ascension and commercial operation have been underway. Thus, key MP&L personnel who would be involved in the preparation and review of various updated FSAR sections have been, and continue to be, heavily involved in supporting full power licensing, startup and power ascension testing of Grand Gulf Nuclear Station Unit 1. MP&L has diligently sought to prepare for full power operation of the facility and has reasonably devoted its resources to that end. MP&L believes that its situation thus presents special circumstances and that there is good cause for the exemption to be granted. Moreover, the exemption is in the public interest as discussed below.

The public interest is served by continuing with efforts devoted to assuring timely commercial operation of a plant which has been completed, found safe, and duly licensed for full power operation. MP&L notes that the FSAR update requirement is informational in nature and does not constitute a licensing action. 45 Fed. Reg. 30614, 30615. The Staff, in Generic Letter 81-06, has provided guidance that the original FSAR, as amended, remains the licensing basis for the plant. MP&L has provided post-low power licensing amendments to the FSAR and other docketed information such that the NRC has accurate information and analyses in regard to many material matters of safety significance.

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To the extent that the FSAR Update process may be thought to be pertinent to emergency planning, adequate documentation has been and will be available where needed pending the update. Controlled copies of principal design drawings through the latest revision are available to the control room operators and the Technical Support Center (TSC) staff. In the event of the activation of the GGNS Emergency Plan, controlled drawings are also available at the Emergency Operations Facility, for use by both MP&L support staffs and NRC representatives, if necessary. In addition, a system has been implemented to maintain designated control room and TSC drawings consistent with plant modifications which have not been fully processed through the drawing revision program. For these reasons, we consider that adequate information is available to the control room operator, TSC staff, and emergency support staffs commensurate with their roles and principal activities in an emergency response situation.

For the reasons stated above and because the requested temporary exemption is schedular, we consider that the requested relief represents no increase in risks to public health and safety. There is therefore, no increased radiological environmental risk involved. For these same reasons, the requested relief should result in no increase in non-radiological, environmental impact. Therefore, the requested schedular exemption poses no undue risk to the public health and safety, has no environmental implications, is in the public interest, and should be granted.

Generic Letter 81-06, which discusses format and content of FSAR updates, states that the original questions and responses that were previously submitted remain in the docket file as part of the record. The generic letter also recommends that the responses to the questions be appropriately incorporated into the "body" of the updated FSAR. The exemption request date would provide time needed to adequately incorporate the responses into the text of the initial FSAR update. Additionally, the initial updated FSAR will be a "clean" document without change bars and revision numbers, as provided in Generic Letter 81-06. Finally, revised as-built plant drawings, current to within 6 months of the FSAR update submittal, will be included in the FSAR update.

The current FSAR, as configured, applies to both GGNS Units 1 and 2. MP&L is required by the FSAR update rule to prepare an update for the licensed facility (Unit 1). Therefore, the update will be a "clean" copy which incorporates revisions applicable to Unit 1 only or to both Units 1 and 2 when such are known with certainty. Contrary to NRC's interpretation of MP&L's earlier exemption request, in regard to as-built drawings, MP&L did not intend to delay the updating of plant drawings until the licensing of GGNS Unit 2. In its prior exemption request, MP&L intended to request that the time for complete reprinting of the entire FSAR, including these pages, tables, and drawings which need no updating, be extended until the licensing of GGNS Unit 2. The bases for this extension were originally stated in MP&L's previous exemption request; however, as explained above, that aspect of the exemption is no longer being sought.

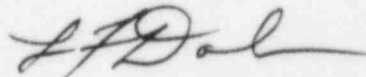
Based on the above justification, MP&L believes that there are compelling reasons to grant an extension of time until December 1, 1985 for the filing of the updated GGNS FSAR. In summary, the Commission regulations provide for this extension, it is consistent with the requirements of 10CFR50.12 regarding

exemptions, it is in the public interest and has no safety or environmental impact, and most importantly, it is consistent with the original intent of the rule.

Based on the rationale discussed above, the requested extension will put GGNS Unit 1 on a schedule consistent with that of other recently-licensed units in that the period between full power licensing and the filing of the FSAR update will be approximately 15 months. As indicated in the attached table, this compares favorably with the industry average duration of approximately 16 months between full power licensing and filing of the FSAR update. Moreover, since the updated FSAR will, in large part, integrate information, much of which is already on file with the NRC, there will be a less material difference between the FSAR, as amended, and the updated FSAR than might appear, at first impression to be the case.

MP&L requests that this exemption be considered at your earliest possible convenience, as it has significant impact on our overall resource planning. Your cooperation in this matter is appreciated.

Yours truly,



L. F. Dale  
Director

JHS/PBB/JGC:rw

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

Mr. Richard C. DeYoung, Director  
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NUCLEAR POWER PLANT SCHEDULES  
FULL POWER LICENSE TO FIRST FSAR UPDATE\*

<u>Plant</u>	<u>Full Power License</u>	<u>First FSAR Update</u>	<u>Duration (Months)</u>
La Salle 1	8/83	4/84	8
WNP 2	12/84	12/85	12
Farley 2	3/81	6/82	15
San Onofre 2	9/82	2/84	17
Susquehanna 1	11/82	7/84	20
Summer	11/82	8/84	21
St. Lucie 2	6/83	4/85	<u>22</u>

Industry Average = 16.4 months

\*Survey of operating plants that received a full power operating license after the update rule went into effect. Data collected by MP&L.