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MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

February 8, 1984

JAMES P. MCGAUGHY, JR.
VICE PRESIDENT

U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W. Suite 2900
Atlanta, Georgia 30303

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

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket No. 50-416 and 50-417
License No. NPF-13
File 0260/L-860.0/H
1983 Systematic Assessment of
Licensee Performance Board
Report
AECM-84/0070

By letter dated January 11, 1984, the NRC transmitted to Mississippi Power & Light (MP&L) the Systematic Assessment of Licensee Performance (SALP) Board report for the period of September 1, 1982, through September 30, 1983. On January 19, 1984, MP&L representatives met with members of the NRC Staff to discuss the findings of the SALP Board. The purpose of this letter is to provide MP&L's comments on the SALP Board report for 1983.

MP&L appreciates the detail of the SALP Board's review and the candor of their report. MP&L feels that a thorough and frank assessment of our performance is beneficial and serves to ensure that both our resources and our attention are focused in the appropriate directions.

Please find attached both comments on selected areas of the SALP Board report and a discussion of some actions which MP&L has already instituted to address concerns which were noted in the report. If you have any questions please contact this office.

Yours truly,

JPM:sad
Attachment

cc: (See Next Page)

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cc: Mr. J. B. Richard (w/a)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (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
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101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30303

Comments on the 1983
SALP Board Report*

A. Plant Operations (Report Section A.1)

The SALP report noted several concerns in the area of Plant Operations; listed below are actions which were instituted either during the evaluation period or shortly thereafter. It is MP&L's position that these actions show a concerted effort to improve in areas which were assessed as requiring additional MP&L management attention.

1. As discussed in the report, the Operations Enhancement Program (OEP) was instituted during the report period. Significant progress has been made in the areas addressed in the OEP. At present most of the short term actions have been completed, and work on the long term action items is continuing. MP&L management is continuing to direct a high level of attention toward the total implementation of this program.
2. In mid-November, 1983, an Operator Recertification Program was instituted to verify the level of plant knowledge of all control room operators. This program included both operator recertification and management controls. The Recertification Program is expected to be completed by mid-February, 1984.
3. In the past several months, the total number of temporary alterations has been reduced significantly. The level of active temporary alterations has been fluctuating in the range of 50 to 60. With the exception of the emergency diesel generator repair following the recent fire, there have been no violations or licensee identified deficiencies during this period of reduced temporary alterations.
4. During the review period, a Plant Staff Compliance Section was formed. This section has implemented numerous measures to assure adherence to NRC commitments and correct procedural compliance problems. Some of the actions taken include independent verification of corrective action, using computerized tracking systems, and actively pursuing the full implementation of the Requirements Procedure Tracking System, which is currently scheduled for completion at the end of 1984.

On Page 9 of the subject report it is stated that MP&L does not participate in the Nuclear Plant Reliability Data System (NPRDS). This statement is incorrect. MP&L is actively participating in the NPRDS program. Although previously utilities were not permitted to submit plant data prior to commercial operation, MP&L has requested and

*SALP Board Report, NRC letter to MP&L, dated January 11, 1984 (MP&L assigned serial, MAEC-84/0006)

obtained permission from the NFRDS User's Group to submit data prior to commercial operation. System engineering data has been submitted for 34 GGNS reportable systems and collection of reportable component engineering data is continuing. A preliminary magnetic tape of GGNS reportable data has been submitted to INPO to ensure that any technical problems associated with the transfer of data via magnetic tape are resolved prior to the submission of all engineering data. At present it is anticipated that all reportable component engineering data will be submitted for use in the NFRDS data base by April 1, 1984.

B. Maintenance (Report Section A.3)

In the maintenance section of the SALP report, the primary area of concern was the lack of management involvement. MP&L has taken actions to increase management involvement, improve procedures, and otherwise address procedural compliance problems. The actions taken to address the SALP concerns and others are discussed below.

1. Increased emphasis has been placed on management involvement in maintenance activities. The Maintenance Section was reorganized and an Assistant Plant Manager - Maintenance and Scheduling was established. Further, engineering support for maintenance activities was placed under the direct control of the Maintenance Section.
2. Management attention has been placed on instances of maintenance personnel's failure to follow procedures by tracking all such occurrences. Appropriate disciplinary action has been taken for repeated instances of failure to follow procedures.
3. Increased emphasis has been placed on determining the root cause of equipment failures.
4. To further assist in correcting the problem of failure to follow procedures, an aggressive program has been instituted to reduce both the total number of outstanding Temporary Change Notices (TCN) and, in many cases, the number of TCNs in any given procedure. Procedures having large numbers of TCNs are being revised to integrate all existing TCNs into a new, more understandable procedure revision. In addition, goals have been established to reduce the total number of outstanding TCN's for all plant procedures to less than 100, prior to plant restart. Further efforts will continue with the objective of reducing the total number of all outstanding TCN's to less than 50 for a continuing operational basis.

C. Surveillance and Preoperational Testing (Report Section A.4)

The SALP report discusses the steps undertaken to improve the surveillance program and other corrective actions to address concerns in surveillance and preoperational testing. In addition to the actions

discussed, two other actions taken to improve performance in this area are described below.

1. To enhance the reliability of the plant surveillance program and establish confidence that surveillance will be performed in a timely manner, a computerized surveillance tracking system has been established. Between the time the system was activated and the completion of the low power testing program, a period of approximately four (4) months, only one surveillance was not performed prior to its late date.
2. To enhance the credibility of the containment isolation valve program, valve lineup drawings have been incorporated as an integral part of all local leak rate testing (LLRT) procedures. These procedures are currently being used in the performance of LLRT surveillances.

D. Licensing Activities (Report Section A.9)

The SALP report indicates that three areas of licensing activities were of poor quality, specifically submittals pertaining to technical specifications, control room inleakage, and equipment qualification. Submittals in these areas were claimed to have "obvious errors (sometimes repeated) and irrelevant technical discussion." The following discussions present MP&L's position or clarifications on the examples cited as exhibiting poor quality.

1. Technical Specifications

MP&L takes exception to the subject report's characterization of MP&L's submittals of proposed technical specification changes as containing repeated, obvious errors. From late 1982 through the fall of 1983, MP&L devoted significant resources to the surveillance procedure review effort. This review effort, in part, resulted in the formal submittal of some thirteen packages of proposed changes to the Grand Gulf Technical Specifications from March to September 1983. Those submittals represented approximately 160 requested items. Of this total, some 23 were resubmittals of earlier formal change requests. Only seven items, formally submitted, were denied by the NRC and not revised or resubmitted by MP&L.

MP&L certainly acknowledges the burden placed on both MP&L and NRC resources in this area and recognizes the significant effort put forth by the NRC Staff in conducting their review of the proposed changes. It is MP&L's position, however, that areas characterized as erroneous, i.e., unacceptable to the NRC reviewers, were generally the result of valid technical disagreements between our staffs on content, format, and regulatory interpretations. Overall, MP&L's position is that the technical quality of the submittals was acceptable.

2. Control Room Inleakage

MP&L disagrees with the assessment of the control room inleakage submittal. The conflicts with the NEC Staff on this issue arose due to differences of opinion on the adequacy of the methodology and its application, not because of actual errors in the submittal.

MP&L committed to perform Grand Gulf specific wind tunnel tests to determine what X/Qs are appropriate. MP&L believes that these tests support the earlier MP&L methodology as conservative overall. X/Qs from these tests are generally lower than those originally calculated by MP&L.

3. Equipment Qualification

The comparison of MP&L's initial equipment qualification submittal (10CFR 50.49) of May 20, 1983, with the latter submittal of August 25, 1983, does not appear to be an accurate treatment of the significance of changes from one report to the other. The following information is presented giving the breakdown of changes (or "deficiencies" as the SALP report indicates).

The SALP Board report indicates that the later MP&L submittal corrected some 366 "deficiencies." The report's characterization of all changes from the May, 1983, submittal as deficiencies is not an appropriate measure of the document's accuracy.

By MP&L's records, there were a total of 374 changes made from the May, 1983, MP&L submittal. The majority of these changes (281) were purely administrative in nature. The major portion of changes were due to the expansion of tables to explicitly label each component. (Identical components were previously grouped under the same designator.) Some other changes were due to updates in qualification status.

The remaining changes, not in categories discussed above, were in a technical area. The original May 20, 1983, submittal identified certain components as fully qualified. The subject components had been identified in previous, formal MP&L submittals, as justified for interim operation. Taking into account these circumstances, these changes too can be considered "administrative" in nature.

E. Quality Assurance Program (Section A.10)

In section 10 of the SALP report it is stated, in part, that "...Quality Assurance, in turn, audited the Plant Quality section but Quality Assurance did not routinely observe the performance of licensed activities in the field..."

As indicated in the report, Quality Assurance does audit the Plant Quality Section; however, it should be noted that Quality Assurance also routinely audits the performance of licensed activities in the field. Discussions concerning the scope, depth, and content of the Quality Assurance audits were held February 1, 1984, with Messrs. D. M. Verrelli, C. A. Julian and A. G. Wagner. It became clear that previously, MP&L did not have a mechanism to inform the NRC Inspectors of the field observation activities pertaining to a particular audit. In the future, Nuclear Site Quality Assurance audit reports will contain, where appropriate, a section titled "Field Observations" to provide greater visibility of this important function.