



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

January 17, 1985

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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-29  
File: 15524/15521  
Report No. 50-416/84-49, dated  
December 18, 1984 (MAEC-84/0435)  
AECM-85/0008

This is in response to your letter to Mississippi Power & Light Company from John A. Olshinski, dated December 18, 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:vog  
Attachment

cc: Mr. J. B. Richard (w/a)  
Mr. R. B. McGehee (w/a)  
Mr. N. S. Reynolds (w/a)  
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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NRC VIOLATION 50-416/84-49-01

Notice of Violation

"Technical Specification 3.7.7.a requires a continuous firewatch be established on at least one side of an inoperable fire rated assembly within one hour of the assembly being determined inoperable.

Contrary to the above, on November 7, 1984, it was discovered that electrical raceways which did not have the proper fire barrier installed and in an area with inoperable fire detection, did not have a continuous firewatch. The missing fire barriers were discovered on October 15, 1984, and confirmed on November 2, 1984, by the plant's Nuclear Engineering Department."

I. ADMISSION OF DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation; however, there was no effect on the health and safety of the public.

II. REASONS FOR THE VIOLATION IF ADMITTED

OPERATIONS

On October 15, 1984, during an ongoing fire protection system review relative to 10 CFR 50 Appendix R requirements, MP&L's Nuclear Plant Engineering (NPE) section documented the existence of Unit 1 safety-related cable raceways that did not have the required fire barriers. A Material Nonconformance Report (MNCR) 00773-84 was initiated by NPE and reviewed by the Operations Shift Superintendent for effects on plant operations. However, the MNCR did not document the exact locations of the raceways in question. The Shift Superintendent assumed that all the raceways were located in either the Unit 1 Control Building or Auxiliary Building and thought that the Technical Specifications had been satisfied since all of these areas were already being patrolled for other reasons.

After conferring with NPE on November 7, 1984, Operations discovered that two of the areas containing the subject raceways were located on the Unit 2 side of the Control Building. (It was later determined that the raceway in one of the two areas met 10 CFR 50 Appendix R requirements.) The fire detection equipment in the Unit 2 areas had not been under surveillance because the GGNS Technical Specifications did not address these areas.

MP&L concludes the cause of the events discussed above resulted from: 1) insufficient information being provided on the MNCR by NPE; and 2) insufficient programmatic control existed for MNCRs identified by the Shift Superintendent as requiring further engineering review/evaluation.

As stated in the inspection report, it is MP&L's position that our operators acted in a conservative manner when they documented the Technical Specification Action Statement 3.7.7 and Operations took the appropriate action given the information presented to them.

NUCLEAR PLANT ENGINEERING (NPE)

Responsible NPE personnel did not recognize the need for providing raceway locations on MNCRs.

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

OPERATIONS

A firewatch was established and will be maintained until the design changes required for conformance are implemented.

The Grand Gulf General Manager issued a memorandum to the Manager of NPE informing him of the information which should be provided to the Shift Superintendent with an MNCR in order that an appropriate operability review can be performed. This memo requested that the information provided be shared with the NPE cognizant engineers.

Plant Administrative Procedure 01-S-03-3, "Material Nonconformance Reports (MNCRs)" was revised to provide additional control for processing MNCRs which are determined to require further engineering evaluation during the Shift Superintendent's operability review.

The Operations Superintendent issued memos to the Shift Superintendents/ Supervisors informing them that MNCRs should be reviewed carefully to ensure adequate information is included on the MNCR so that an immediate determination of system operability can be made. Further direction was provided to require that room numbers be specified on the Limiting Condition of Operation in order to add assurance that the proper rooms are watched.

NUCLEAR PLANT ENGINEERING

Training of NPE personnel was conducted November 27, 1984, and is documented in NPEI: 84/1697. The objective of this training was to emphasize to the attendees the information that should be provided to Operations with an MNCR. The following points were stressed in the training session.

- a. The MNCR originator should indicate what equipment may be affected.
- b. When possible, the originator should provide possible consequences of the described nonconformance.
- c. The originator should indicate what type of control function or equipment effects may be observed.
- d. NPE will support the Shift Superintendent's requests for additional information on MNCRs.

The result achieved by this training is that personnel have a better understanding of what information is needed by the Shift Superintendent if nonconforming conditions are identified.

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

MP&L considers the corrective action described in III above sufficient to prevent further violation.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has beer achieved.