



ENTERGY

Entergy Operations, Inc.
P.O. Box 703
Port Gibson, MS 39157
Tel: 601-437-6408

W. T. Cottle
Vice President
Chairman
Grand Gulf Nuclear Station

September 25, 1992

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C.

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Response to Incomplete Work Package Review
Report No. 50-416/92-18, dated 08/28/92
(GNRI-92/00185)

GNRO-92/00121

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/92-18-01.

Yours truly,

W T Cottle

WTC/RR/cg
attachment

cc: Mr. D. C. Hintz
Mr. R. H. Bernhard (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)

Mr. Stewart D. Ebnetter (w/a)
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

Mr. P. W. O'Connor, Project Manager (w/a)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 13H3
Washington, D.C. 20555

9209300251 920925
PDR ADOCK 05000416
G PDR

80094

*JEOL
1/1*

Notice of Violation 92-18-01

Technical Specification 6.8.1.a requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2. Regulatory Guide 1.33, Appendix A, recommends that procedures for performing maintenance which can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures and documented instructions. Administrative Procedure 01-S-07-1, Control of Work on Plant Equipment and Facilities, paragraph 2.8.2, requires that maintenance planners have the responsibility for the assembly of correct work packages that can be performed in the field by craft without unanticipated effects to plant operation.

Contrary to the above, on July 29, 1992, a work package was issued prior to receiving a complete review which, when worked, resulted in an unanticipated ESF actuation.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

A work order was issued on June 14, 1992 to troubleshoot the Leak Detection System (LDS) trip unit E31N683A for the RCIC turbine steam supply line. Upon completion of initial troubleshooting, the work order was returned to the original work planner for subsequent troubleshooting instructions. Additional troubleshooting instructions were incorporated July 2, 1992 and included the correct trip setpoint value for E31N683A. Further troubleshooting on July 17 indicated that E31N683A's transmitter E31N083A required replacement. The work order was returned to the work planning group for additional instructions to replace transmitter E31N083A.

Work resumed on July 29, 1992 to replace E31N083A. A simulated signal was inputted into the trip units to maintain an untripped condition while replacing E31N083A. The parameter value had been specified as part of the work order planning. Automatic closure of containment isolation valve E51F064 occurred when the trip unit was placed in CALIBRATE. Trip logic for actuation of this RCIC containment isolation valve requires only a single channel (i.e., non-coincident) trip signal from LDS.

The configuration of LDS for the RCIC turbine steam supply line has a single transmitter upstream of a piping elbow. The transmitter's signal goes to a master trip unit and a slave trip unit. The master trip unit processes the signal for a line break downstream of the elbow. The slave trip unit processes the signal for a line break upstream of the elbow.

Development of work order instructions performed on July 17 used the trip setpoint for the master trip unit. The planner was aware that the system incorporated a master and slave trip unit configuration and that work would affect slave trip unit E31N690A. The planner used component data base (CDB) information for master trip unit E31N683A only. The planner assumed that parameters were identical for both components due to information on the CDB data sheet summary for master trip unit E31N683A. This personnel error resulted in specifying the incorrect parameter value for slave trip unit E31N690A on the work order, ultimately causing the RCIC isolation.

Information in the CDB precipitated the personnel error. Notes on the CDB data sheet for trip unit E31N683A stated "E31N690A: Flow high switch, slave." This information was misleading with respect to the slave trip unit decreasing upset direction. However, information on the CDB data sheet for slave trip unit E31N690A was correct and denoted the decreasing upset direction.

A contributing factor was that the work order planning process did not specify the source(s) of information to be used in planning maintenance activities. Sometimes the CDB is used, while surveillance procedures are used other times. Selection of information sources had been up to the individual planner.

III. Corrective Steps Which Have Been Taken and Results Achieved

The individual planner was counselled on the event and the event was discussed in detail with all planners.

The CDB has been amended to be more specific and descriptive for this and similar components in the CDB. Other configurations identical or similar to these trip units in RCIC were assessed for similar characteristics.

IV. Corrective Steps to be Taken to Preclude Further Violations

The administrative procedure governing work control (01-S-07-1) will be amended to specify the progression of sources to be used for work order planning. Accuracy of certain information sources will be verified when used in work order planning activities.

V. Date When Full Compliance Will Be Achieved

These actions will be completed by October 30, 1992.