# MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39215-1840

February 8, 1985

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

Unit 1

Docket No. 50-416 License No. NPF-29 File: 0260/L-814.1

Response to Generic Letter 84-24 on Certification of Compliance to

10 CFR 50.49 AECM-85/0036

#### References:

(1) AECM-81/0231 dated July 1, 1981

(2) AECM-81/0335 dated September 1, 1981

(3) AECM-81/0502 dated December 21, 1981

(4) AECM-82/0141 dated April 8, 1982

(5) AECM-82/0168 dated April 27, 1982

(6) AECM-83/0047 dated February 14, 1983

(7) AECM-83/0286 dated May 20, 1983

(8) AECM-83/0381 dated August 25, 1983

(9) AECM-84/0394 dated August 5, 1984

(10) AECM-84/0531 dated December 21, 1984

(11) AECM-85/0024 dated January 25, 1985

(12) AECM-85/0042 dated February 7, 1985

#### INTRODUCTION

In Generic Letter 84-24 ("Certification of Compliance to 10 CFR 50.49, Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants," dated December 27, 1984), the NRC Staff requested that Mississippi Power & Light (MP&L) provide specific certifications regarding compliance with 10 CFR 50.49 for the Grand Gulf Nuclear Station (GGNS) Unit 1.\* MP&L's response is set forth below.

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<sup>\*</sup>Staff Generic Letter 84-24 (December 27, 1984) requested that MP&L provide a response within 30 days, i.e., by January 26, 1985. However, the Staff did not actually mail the Generic Letter to MP&L until early January. Accordingly, MP&L sought and received from Mr. Les Kintner, the NRC Project Add. Skulde Manager for GGNS, an extension until February 8, 1985, in which to submit the response.

### BACKGROUND

MP&L initially established an environmental qualification program for electrical equipment as required by NUREG-0588. The results of this program were submitted to the NRC on July 1, 1981 (Ref. 1). Information supplemental to the GGNS NUREG-0588 program was subsequently provided in References 2 through 6 which included the GGNS response to the NRC findings resulting from an EQ audit conducted on October 19-22, 1981.

On May 20, 1983 (Ref. 7), MP&L submitted the GGNS response to the requirements identified in 10 CFR 50.49. In this submittal, MP&L specifically addressed the requirements of paragraphs (b)(1), (b)(2) and (b)(3) of 10 CFR 50.49. Also, pursuant to 10 CFR 50.49(g), MP&L submitted requests for extension to the March 31, 1985 EQ deadline on December 21, 1984 (Ref. 10) and on February 7, 1985 (Ref. 12). Approval of these extension requests is pending NRC review.

Additionally, MP&L continues to review equipment, in light of the requirements of 10 CFR 50.49, for potential inclusion into the GGNS EQ program.

## CERTIFICATION

In response to Generic Letter 84-24 and in consideration of the information as set forth above, MP&L hereby certifies as follows:

- (a) MP&L has in place and is implementing an Environmental Qualification Program for GGNS that is expected to satisfy the requirements of 10 CFR 50.49 by March 31, 1985 except for (1) the specific extensions requested by References 10 and 12, and (2) License Condition 2.C(36) which schedules qualification of Regulatory Guide 1.97 equipment.
- (b) With the exception of Regulatory Guide 1.97 equipment [being qualified in accordance with the schedule set forth in License Condition 2.C(36)], justifications for continued operation have been submitted to the NRC for all equipment within the scope of 10 CFR 50.49 which are currently unqualified, as follows:
  - (1) All electrical equipment identified by MP&L as requiring an extension beyond March 31, 1985 to complete qualification has been supported by justifications for continued operation (JCOs) which were provided in References 9, 10, 11 and 12.
  - (2) The remaining unqualified equipment (expected to be complete by March 31, 1985) have been supported by interim operation justifications (IOJs) submitted in Supplement 1 (Ref. 2) of our response to NUREG-0588. These IOJs have been revised to reflect the current GGNS status and will be maintained in the GGNS EO files.

The above certifications are being made in recognition of the IE Information Notices and the one IE Bulletin referenced in Generic Letter 84-24, in that based on our reviews to date, none of these NRC documents causes equipment at GGNS to be unqualified in violation of 10 CFR 50.49. A few of the notices are still undergoing detailed review in accordance with the MP&L IE document

review program. In the event that the ongoing reviews result in findings that substantially call into question the qualification of necessary equipment, MP&L will take appropriate action in accordance with 10 CFR 50.49 and other applicable NRC regulations.

Yours truly,

L. F. Dale Director

SAB/JGC:rg 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

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

BEFORE THE UNITED STATES REGULATORY COMMISSION LICENSE NO. NPF-29 DOCKET NO. 50-416 IN THE MATTER OF MISSISSIPPI POWER & LIGHT COMPANY MIDDLE SOUTH ENERGY, INC. SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION AFFIRMATION I, L. F. Dale, being duly sworn, stated that I am Director, Nuclear Licensing and Safety of Mississippi Power & Light Company; that on behalf of Mississippi Power & Light Company, Middle South Energy, Inc., and South Mississippi Electric Power Association I am authorized by Mississippi Power & Light Company to sign and file with the Nuclear Regulatory Commission, this response to Generic Letter 84-24; that I signed this response as Director, Nuclear Licensing and Safety of Mississippi Power & Light Company; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief. STATE OF MISSISSIPPI COUNTY OF HINDS SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 8th day of February, 1985. (SEAL) and Suchardso My commission expires: october 27, 1987