Docket No. 50-416

Mr. J. B. Richard Senior Vice President, Nuclear Mississippi Power & Light Company P.O. Box 23054 Jackson, Mississippi 39205

Dear Mr. Richard:

DISTRIBUTION:
Docket No. 50-416
NRC PDR
Local PDR
PRC System
LB #4 r/f DZieman
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LKintner WHodges

Attorney, OELD DMJordan, I & E JNGrace, I & e ACRS (16)

Subject: Grand Gulf Unit 1 - Delay of Testing Division 2 of the RHR System in the Steam Condensing Mode

Your letter dated September 13, 1984 requested approval of plans to test Division 1 of the RHR System in the steam condensing mode and approval of a delay in testing Division 2 of the RHR in the steam condensing mode. By letter dated October 13, 1984, the staff approved the planned tests of the steam condensing mode for Division 1 and stated that delay of the tests of the steam condensing mode for Division 2 would be considered separately. The purpose of this letter is to provide our consideration of your request for delay of Division 2 tests.

The request in your letter of September 13, 1984 for NRC approval of a delay in the testing of the steam condensing mode for Division 2 of the RHR system was based on requirements in Condition 2.C.(40) of the Grand Gulf Unit 1 operating license. This license condition requires, among other things, that prior NRC approval be obtained for "elimination of any test identified in Section 14 of MP&L's Final Safety Analysis Report (FSAR), as amended, as being essentia." Although the steam condensing mode is included in the description of Test Number 71, "Residual Heat Removal System" (FSAR Section 14.2.12.3.34), it is not "essential" to test this mode of the RHR system as part of the startup test program for safety related equipment. It is "essential" to test the other two modes of the RHR system described in Test Number 71 - shutdown cooling mode and suppression pool cooling mode. The steam condensing mode is not used in accident analyses whereas the other two modes are.

Accordingly, the NRC staff concludes that, because the steam condensing mode of the RHR system is not an essential test within the meaning of License Condition 2.C. (40), NRC approval to delay this test for Division 2 of the RHR system is not required. However, this test of Division 2 should be conducted prior to utilizing the steam condensing mode of Division 2.

This conclusion supersedes the statement in our October 19, 1984 letter, based on preliminary considerations of your request, that deferral of this test requires NRC approval.

Sincerely,

Thomas M. Novak, Assistant Director for Licensing

Division of Licensing

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