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November 7, 1984

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-860.0
TDI Diesel Generator Fuel
Oil Line Inspection -
Supplemental Information
AECM-84/0485

By letter dated August 3, 1984, serial AECM-84/0392, MP&L provided confirmation of the completion of certain commitments related to the Grand Gulf Nuclear Station (GGNS) Unit 1 TDI diesel generators (D/G). As a result of an inappropriate choice of words, one of the statements contained in the letter has a potential for misinterpretation. This was initially discussed with M. D. Houston, our Project Manager, on September 7, 1984. Subsequently, on September 21, 1984, Mr. Houston requested a formal transmittal clarifying the matter. The purpose of this submittal is to provide the information requested by Mr. Houston.

The statement in question pertains to the inclusion of a D/G fuel oil line inspection into the Augmented Maintenance/Surveillance Program for the GGNS Unit 1 TDI D/Gs. Item 4 of AECM-84/0392 states:

"Inclusion of fuel oil inspection in the plant surveillance program - As noted in the July 26, 1984 letter, a visual inspection of the engine fuel oil lines has been incorporated in the Augmented Maintenance/Surveillance Program."

The purpose of this statement was to reaffirm a previous statement that the fuel oil line inspection had been incorporated into the Augmented Maintenance/Surveillance Program, which was a table contained in previous submittals (Table A-1 of AECM-84/0373 and AECM-84/0386). However, as a result of a review of the correspondence, MP&L has determined that this statement, when combined with another statement which confirms the completion of commitments, could be interpreted to mean that the inspection had been incorporated into the plant surveillance program (i.e., plant procedures).

At the time of the submittal, the inspection had been incorporated into the Augmented Maintenance/Surveillance Program (Table A-1) but had not been incorporated into plant procedures. The inspection was initially performed as

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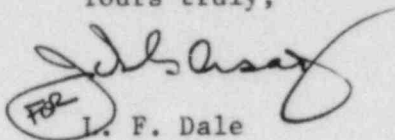
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a special inspection on July 26, 1984 and was not due to be performed again for approximately 30 days. A Preventive Maintenance Instruction detailing the fuel oil line inspection was approved on August 14, 1984. Task cards requiring monthly performance of the inspection were incorporated into the surveillance program prior to the next required inspection which was conducted on August 26, 1984.

As stated above, MP&L's intention was to reaffirm that the inspection had been incorporated into the Augmented Maintenance/Surveillance Program, not to confirm that the plant instruction had been written. Additionally, it is MP&L's position that the inclusion of the inspection requirements into plant instructions following the special inspection was performed in a timely manner. If you or your staff have any questions on this matter please contact this office.

Yours truly,


J. F. Dale
Director

REW/JGC:rw

cc: Mr. I. B. Richard
Mr. R. B. McGehee
Mr. N. S. Reynolds
Mr. G. B. Taylor

Mr. Richard C. DeYoung, Director
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