



# MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

October 3, 1984  
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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  
Units 1 and 2  
Docket Nos. 50-416 and 50-417  
License No. NPF-13  
File: 0260/15525/15526  
PRD-84/08, Containment and Drywell  
Personnel Air Lock Seismic  
Qualification  
AECM-84/0456

- References:
- (1) AECM-84/0237, 4/20/84
  - (2) AECM-84/2-0010, 6/8/84
  - (3) AECM-84/0337, 6/21/84
  - (4) June 12, 1984, Letter from R. L. Baer to R. C. Lewis

Mississippi Power & Light Company (MP&L) provided a final report for Grand Gulf Nuclear Station (GGNS) Units 1 and 2 for a Reportable Deficiency identified as PRD-84/08 in Reference (3). The deficiency concerned a failure of the vendor, W. J. Woolley Co., to seismically qualify the personnel air locks pneumatic supply system. As stated in Reference (3) the air lock and its associated components were specified to be seismically qualified by the supplier per GGNS Specification 9645-C-153.0. However, contrary to the specification, it was determined that the personnel air locks pneumatic supply system (tubing, supports, and instrumentation) between the check valve upstream of the accumulators and the seals had not been qualified.

MP&L recently received a copy of the NRC internal correspondence of Reference (4). It concerned the potentially generic problem at Grand Gulf regarding the seismic qualification of the containment and drywell personnel air locks. The NRC internal correspondence indicated per conversations with W. J. Woolley Company personnel that Grand Gulf was the last site to upgrade their air lock air system to seismic qualifications.

After receiving the NRC internal correspondence, MP&L requested the GGNS Architect-Engineer (A/E) to investigate the reason why the deficiency concerning the seismic design of the airlock air system had not been handled consistent with other nuclear plants. As a result of this investigation, it appears that there has been a misunderstanding based on the communications between the NRC and W. J. Woolley concerning the GGNS Part 21 report (Reference 3) and the "upgrade" of the air lock air system referred to in the NRC internal correspondence.

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The "upgrade" Woolley refers to was presented to our A/E in 1978, not to meet seismic requirements but as a "new design" which simplified the previous design and incorporated the requirements of ANSI-N-271-1976 "Containment Isolation Provisions for Fluid Systems," which was not required for Grand Gulf. Our A/E rejected the proposal and chose to retain the issued contract and specification (9645-C-153.0) requirements which has always specified seismically qualified air locks.

Conversations between our A/E and Mr. R. A. Maffei (now with Danley Manufacturing Co.) concerning his discussion with the NRC resulted in some confusion on Mr. Maffei's part as to how this "upgrade" was presented to the various projects and the reason for it. Mr. Maffei indicated that his recounting of the situation was somewhat hampered by his lack of access to past Woolley records.

MP&L and our A/E feel that the NRC should consider a reevaluation of the Part 21 report submitted by MP&L for potential generic effects on other plants. Installation of the modified system does not insure that the air lock systems installed at other plants were seismically qualified. The deficiency reported by MP&L was caused by the failure of the vendor to supply seismically qualified equipment as specified, not by our A/E's rejection of the "upgraded" or "modified" system.

This letter also serves to document a September 20, 1984 telephone conversation between S. H. Hobbs and E. B. Shingleton of MP&L and Mr. R. E. Carroll of the NRC.

Yours truly,



L. F. Dale  
Director

EBS/SHH:rg

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

Mr. Richard C. DeYoung, Director  
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