

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 50-416
License No.: NPF-29
Report No.: 50-416/96-12
Licensee: Entergy Operations, Inc.
Facility: Grand Gulf Nuclear Station
Location: Waterloo Road
Port Gibson, Mississippi
Dates: July 8-12, 1996
Inspectors: Michael E. Murphy, Reactor Engineer (Examiner)
Ryan E. Lantz, Reactor Engineer (Examiner)
Approved By: John L. Pellet, Chief, Operations Branch
Division of Reactor Safety

ATTACHMENT:

Attachment: Partial List of Persons Contacted
List of Inspection Procedures Used

EXECUTIVE SUMMARY

Grand Gulf Nuclear Station
NRC Inspection Report 50-416/96-12

Operations

- Informality in control room communications was observed in several instances in a short period of observation. No instance was observed where significant information was not communicated; however, facility communication expectations were not met. This is considered a minor weakness, but has the potential to present unnecessary challenges to the operators' continued good operation of the facility.
- The inspectors concluded that the licensee's audit sample size was adequate and provided for a comprehensive review of the transition to the improved Technical Specifications. The one error identified during the audit was properly handled under the correct change process.
- The licensee successfully revised its previous Technical Specifications to the format of NUREG-1434 and relocated requirements to other documents as appropriate.
- The licensee had properly applied the use of the change mechanisms defined in license amendment 120 safety evaluation. The changes reviewed by the inspectors had been correctly processed and properly documented. The one anomaly identified was considered to be the result of a misinterpretation by personnel inexperienced in the use of Part 50.54a changes.

Report Details

I. Operations

01 Conduct of Operations

01.01 Control Room Communications

a. Inspection Scope

The inspectors conducted control room observations using the guidance in NRC Inspection Procedure 71715. Due to unforeseen circumstances the scope of the control room observations was reduced from what was planned. The inspectors conducted only 3 hours of control room observations.

b. Observations and Findings

Observations were made during the morning shift, after crew turnover, with a shift crew that had just returned after being off shift for several days. The plant was at 100 percent power. Nuclear instrumentation surveillances were in progress, and the reactor operator at the controls was acknowledging and clearing control panel annunciators as they sounded due to the surveillance in progress. The operator did not verbally identify the various annunciators as they sounded. After several instances, the inspector asked the plant supervisor, an on-shift senior reactor operator, what the annunciators were and what the facility policy was regarding expected alarms in the control room. The plant supervisor was aware of the annunciators and knew why they were sounding, and also stated that operations management expectations required the operator to verbally report to the senior operator that the alarm was expected due to instrumentation and control surveillance. The plant supervisor stated that these expectations had been promulgated approximately 4 months ago, and that some operators were not yet fully using them. The plant supervisor then counseled the reactor operator on the requirements of management expectations. Subsequently, the inspector observed additional instances of the reactor operator not verbally reporting the expected alarms. Additionally, the inspector observed the same reactor operator not formally report routine alarms, such as cooling tower water level high following a chemical addition and makeup.

The inspector observed several instances where management expectations for communications were not followed. In one instance, the inspector observed the plant supervisor direct the reactor operator to return a control panel switch to normal after the report had been received that the system maintenance had been completed and was ready for restoration. The reactor operator replied only with "yea, OK" then properly repositioned the switch. Management expectations for communications

requires that direction to perform actions be repeated by the performer, then acknowledged as correct by the direction giver. Although the correct switch was operated, management expectations were not met.

c. Conclusions

Informality in control room communications was observed in several instances in a short period of observation. No instance was observed where significant information was not communicated, however, facility communication expectations were not met. This is considered a minor weakness, but has the potential to present unnecessary challenges to the operators' continued good operation of the facility.

03 Operations Procedures and Documentation

03.01 Licensee Audits

a. Inspection Scope (TI2515/130)

The inspectors reviewed the licensee's Quality Systems Audit Report QPA-35.01-95, dated July 27, 1995. This audit was conducted to verify that the improved Technical Specifications contained all of the requirements from the original Technical Specifications or there was documented justification for relocation of the original requirements.

b. Observations and Findings

The licensee's audit reviewed a sample of the requirements from the Technical Specifications, Technical Specification bases, and technical requirements manual. The review also included revised surveillance procedures.

The licensee determined that the more restrictive, less restrictive, and relocated Technical Specification requirements were accounted for in the technical requirements manual or the Technical Specification bases and justifications were properly documented. The surveillance procedures, revised as part of the Technical Specification transition, were determined to be in compliance with Plant Administrative Procedure 01-S-02-7.

The only negative finding identified by the licensee's audit was a typographical error found in Required Action Section D.2 of the automatic depressurization system instrumentation alarm system in Technical Requirements Manual Limiting Condition for Operation 3.5.1. This was corrected by initiating licensing Document Change Request 95-033, under the 10 CFR 50.59 change process.

c. Conclusions

The inspectors concluded that the licensee's audit sample size was adequate and provided for a comprehensive review of the transition to the improved Technical Specifications. The one error identified during the audit was properly handled under the correct change process.

03.02 Improved Technical Specification Implementation

a. Inspection Scope (TI2515/130)

The inspectors reviewed the improved standard Technical Specifications which the facility implemented at the station in March of 1995 using the format and guidance of NUREG-1434, "BWR Standard Technical Specifications." The inspectors compared the current Technical Specifications with a marked up copy of the previous Technical Specifications and the safety evaluation report, approved and issued for the requested license amendment, to determine the disposition of requirements from the previous Technical Specifications. The facility provided a change document which described the changes made to the previous Technical Specifications and disposition of items and actions that were not transferred to the new Technical Specifications. The inspectors reviewed and verified the information and justifications given in the change document. Where previous Technical Specifications requirements were not transferred to the current Technical Specifications, the inspectors verified the requirements were dispositioned as noted in the change document.

b. Observations and Findings

All of the requirements reviewed from the previous Technical Specifications were properly dispositioned, either by capture in the current Technical Specifications, the Updated Final Safety Analysis Report, the technical requirements manual, the Technical Specifications bases, or facility operating and surveillance procedures. The inspectors noted several instances where the change document did not clearly or adequately describe the justification of some changes, but in each case a facility representative was able to provide additional documentation and explanation as to the proper disposition of the requirement in question. Overall, the change document was detailed and provided outstanding reference for the inspectors to conduct the inspection. The inspectors sampled and reviewed approximately 75 percent of the facility Technical Specifications, with outstanding results overall.

c. Conclusions

The licensee successfully revised its previous Technical Specifications to the format of NUREG-1434 and relocated requirements to other documents as appropriate.

03.03 Implementation of Controls

a. Inspection Scope (TI2517/130)

The inspectors reviewed selected revisions to various sections of the relocated Technical Specification elements that had been processed since the implementation of the improved Technical Specifications. These elements had been relocated either to the Updated Safety Analysis Report, Technical Specification bases, or the technical requirements manual. The change control mechanisms identified in the safety evaluation report for license amendment 120 were 10 CFR Part 20, Part 50.4, 50.48, 50.54a, 50.55a, 50.59, 50.72, 50.73, Part 61 and 71.

b. Observations and Findings

Several changes had been made in the technical requirements sections for limiting conditions for operations, action statements, and surveillance requirements. These changes were made under the Part 50.59 rule and were found to be correctly processed and properly documented.

Other changes were found to the administrative controls section of the technical requirements manual. These were processed under Parts 50.54a and 50.59. These changes were also found to be correctly processed and properly documented. However, discussions with the licensee revealed that one change made under the 50.54a process was subsequently challenged by the NRC. The challenge addressed the assumption that the change did not reduce any of the commitments made in the quality assurance program as approved by the NRC. NRC had determined that a reduction in commitments was involved in the change. The licensee had placed a hold on any procedure or document revisions that will be required by the change pending final resolution of the matter. The licensee acknowledged that the expanded application of Part 50.54a could cause additional problems and agreed to review the need for additional guidance and clarification.

The Part 50.54a changes were also the subject of NRC Inspection Report 50-416/96-14. These NRC inspections occurred concurrently, and further information regarding changes to the quality assurance program were addressed in that report.

c. Conclusions

The licensee had properly applied the use of the change mechanisms defined in license Amendment 120 safety evaluation. The changes reviewed by the inspectors had been correctly processed and properly documented. The one anomaly identified was considered to be the result of a misinterpretation by personnel inexperienced in the use of Part 50.54a changes.

V. Management Meetings

X1 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on July 12, 1996. The licensee acknowledged the findings presented. No proprietary information was identified.

ATTACHMENT

PARTIAL LIST OF PERSONS CONTACTED

Licensee

D. Best, Director, Design Engineering
C. Bottemiller, Superintendent, Nuclear Safety & Regulatory Affairs
C. Brooks, Licensing Specialist
W. Cade, Operations Assistant
L. Daughtery, Technical Coordinator, Nuclear Safety & Regulatory Affairs
B. Ford, Senior Lead Engineer, Nuclear Safety & Regulatory Affairs
W. Garner, Supervisor, Quality Programs Audits
J. Hagan, Plant Manager
C. Holifield, Licensing Engineer
M. Larson, Senior Licensing Specialist
M. Meisner, Director, Nuclear Safety & Regulatory Affairs
L. Moulder, Maintenance
S. Saunders, Manager, Nuclear Plant Engineering
M. Shelly, Manager, Training (Acting)
C. Stafford, Operations Assistant
C. Stafford, Operations Assistant
M. Stevens, Mechanical Coordinator, Maintenance
T. Tankersly, Technical Coordinator, Maintenance

NRC

W. Ang, Senior Reactor Inspector, Engineering Branch
E. Ford, Technical Reviewer, Office of Nuclear Reactor Regulation
J. Tedrow, Senior Resident Inspector
K. Weaver, Resident Inspector

INSPECTION PROCEDURES USED

TI2515/130 Improved Standard Technical Specification Implementation Audits
71715 Sustained Control Room and Plant Observation