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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MEMORANDUM FOR: Commissioner Victor Gilinsky

FROM: William J. Dircks, Executive Director for Operations

SUBJECT: GRAND GULF SURVEILLANCE PROCEDURES

Your memo of March 2, 1984, posed four questions on the problems identified with the Grand Gulf surveillance procedures. Enclosed is the NRC staff's response to those questions.

William J. Dircks
Executive Director for Operations

Enclosure:
Answers to Surveillance Procedure
Questions

cc w/encl:
Chairman Palladino
Commissioner Roberts
Commissioner Asselstine
Commissioner Bernthal

ENCLOSURE

ANSWERS TO SURVEILLANCE PROCEDURE QUESTIONS

1. "How many of the Grand Gulf licensed operating staff were originally examined by the NRC on the plant-specific simulator? In the case of those who where (SIC) examined on another simulator, did the operating and emergency procedures that were used apply to Grand Gulf or to a different plant design?"

Response

There are twenty-nine (29) individuals currently on the Grand Gulf licensed operating staff. Some individuals have taken both plant specific and non-plant specific simulator examinations.

- Five (5) individuals (of 29) were originally administered plant specific simulator licensing examinations by the NRC.

- Twenty-two (22) individuals (of 29) were originally administered non-plant specific simulator licensing examinations by the NRC on the General Electric Perry Simulator. The Grand Gulf operating and emergency procedures in effect at the time of these examinations were utilized as much as practicable. However, since these examinations were conducted on a non-plant specific simulator, certain portions of these examinations may have required the use of the Perry Simulator procedures.

- Two (2) individuals (of 29) were not originally administered any simulator examinations, since their licensing examinations occurred after the NRC had discontinued administering non-plant specific simulator examinations but prior to Grand Gulf's simulator becoming operational.

It is important to note, however, that the Region II Operator Licensing Section on February 13-24, 1984, administered full plant oral and simulator examinations (equivalent to an initial licensing examination) to twenty-six (26) individuals on the Grand Gulf licensed operator staff. These examination utilized "current" plant operating and emergency procedures as well as the Grand Gulf plant specific simulator. Twenty-three (23) individuals passed these examinations. The three (3) individuals who failed and the three (3) individuals who have not yet taken these NRC examinations have been removed from licensed duties and will not be returned until they have satisfactorily completed an NRC administered examination.

2. "At present approximately how many errors or discrepancies in the plant surveillance procedures (as opposed to the technical specifications) does the staff estimate were made at Grand Gulf? How many of these have been corrected?"

Response

NRC Region II has not made an independent count of the number of surveillance procedures that needed correction. However, as a condition of the October 1982 Confirmation of Action Letter issued by Region II, MP&L submitted a summary report after their surveillance procedure review effort, documenting the problems found, the corrective action taken, and the probable consequences had no corrective action been taken. That report, designated AECM-83/0622 "GGNS Unit 1 Surveillance Review Program Results" was sent to the Region II on December 1, 1983 with copies to R. C. DeYoung, IE, and the NRC docket files. For the past year and a half resident and regional-based inspectors have monitored the licensee's actions to revise their surveillance procedures to assure that they conform with the technical specifications. Accordingly Region II believes that AECM-83/0622 provides an adequate estimate of the number of errors or discrepancies.

At Grand Gulf there are approximately 510 surveillance procedures. In response to question 2, AECM-83/0622 states that there were approximately 709 errors or discrepancies identified by the licensee in the surveillance procedures. It is emphasized that there were many instances of multiple problems with a single procedure. The number 709 is the item count and not the number of procedures that required revision.

The licensee has informed Region II that all known discrepancies in surveillance procedures required for normal operation (as distinguished from refueling or other special evolutions for which procedures are not yet needed) have been corrected. Region II has audited selected procedures to determine if they are adequate. We conclude, based on our audit, that the procedures are adequate pending resolution of a number of licensee identified items.

3. "How many errors were not merely typographical?"

Response

Based on the Region II review of AECM-83/0622, 46 of the 709 items requiring changes were typographical. Thus 663 errors were not merely typographical.

4. "How many errors involved surveillance checks that did not apply to the as-built plant?"

Response

Based on the Region II review of AECM-83/0622, 32 surveillance procedures were affected by Technical Specification changes which were required to be made to conform to the as-built plant.

Houston

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December 1, 1983

NUCLEAR PRODUCTION DEPARTMENT

U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30303

Attention: Mr. J. P. O'Reilly, Regional Administrator

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13
File 0260/L-835.0
GGNS Unit 1 Surveillance
Review Program Results
AECM-83/0622

Nuclear Regulatory Commission (NRC) Inspection Report No. 50-416/82-67 dated December 10, 1982, transmitted several violations that identified numerous GGNS Surveillance Program deficiencies. Mississippi Power & Light (MP&L) responded to the NRC violations in a letter (AECM-83/436) dated January 21, 1983. In this response, MP&L committed to establish a Surveillance Review Program to rewrite as necessary all surveillance procedures to ensure technical adequacy and compliance to Technical Specifications.

MP&L has implemented numerous corrective actions to ensure that all surveillance procedures are technically adequate and in compliance with the Technical Specifications and a program has been established to effectively incorporate, control, and implement regulatory requirements.

The attached report describes the generic problems discovered during the review effort and the corrective actions implemented to correct surveillance deficiencies.

Yours truly,

L N Hobbs

for L. F. Dale
Manager of Nuclear Services

EBS/SHH:sap
Attachment

cc: (See Next Page)

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MISSISSIPPI POWER & LIGHT COMPANY

cc: Mr. J. B. Richard (w/a)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)
Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/a)
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SUMMARY

This report is a final summary of all problems encountered in the GGNS Surveillance Program.

Inadequate surveillance procedures were a result of inadequate programmatic controls over surveillance activities. [redacted]

Section 1 documents the problems discovered in the surveillance program review effort and the probable consequences of each generic problem. An estimate of the number of procedures associated with each generic problem is provided in the asscciated discussion of each problem.

Section 2 describes the corrective actions used to ensure that all surveillance procedures are technically adequate and in compliance with the Technical Specifications and the program established to effectively incorporate, control, and implement regulatory requirements.

All surveillance procedures have been reviewed for adequacy. All procedures identified as inadequate which are needed for Operational Conditions 2, 3, and 4 have been rewritten, reviewed, and approved, and, as necessary, associated surveillances have been reperformed for the applicable operational requirements. [redacted]

SECTION 1

Generic Problems

A. Non-Incorporation of Technical Specification Items

The following specific problems were found by the Surveillance Review Team involving surveillance procedures that did not adequately incorporate all Technical Specification requirements:

1. Procedures did not exist to perform the surveillances required by Technical Specifications. Thirty-eight procedures were affected.

2. Procedures did not test all the equipment required. Eighty procedures were affected.

3. The motor operated valve thermal overload protection functional test requirements of Technical Specification 4.8.2.1 and Technical Specification 4.8.4.2.3 were incorrectly or inadequately covered by procedures. Twenty-nine procedures were affected.

4. Procedures did not test every valve, breaker, or snubber required by the Technical Specifications. Thirty-four procedures were affected.

5. One procedure was changed prior to an ODCM revision, which would permit the change.

The probable consequences of non-incorporation of Technical Specification items are:

1. The inability to satisfy Technical Specification operability requirements, resulting in entry into an LCO action statement.

2. Uncertainty of the actual operational status of equipment not tested.

3. Operation of equipment not in compliance with Technical Specifications.

B. Procedural Non-Compliance with Technical Specification Definitions

The following specific problems were found by the Surveillance Review Team involving procedural non-compliance with Technical Specification Definitions:

1. Procedures did not check every alarm required by Technical Specification Definitions 1.4 and 1.6. Fifty-four surveillance procedures were affected.

2. Procedures did not specify the acceptance criteria for channel checks. Forty surveillance procedures were affected.

3. Calibration procedures did not adequately include a functional test as required by Technical Specification Definition 1.4. Fifty surveillance procedures were affected.

4. Channel calibration procedures did not check the entire parameter sensing loop (pressure transmitter and trip unit) as required by Technical Specification Definition 1.4. Twenty-eight surveillance procedures were affected.

5. The Logic System Functional Test did not take into account the required "series of sequential, overlapping or total system steps" so that the entire logic system could be considered tested per Technical Specification Definition 1.22. Forty-seven surveillance procedures were affected.

6. Some equipment response times were not covered by procedures. This invalidated the required "series of sequential, overlapping or total steps" concept so that the entire system response time, as defined in Technical Specifications 1.12, 1.13, 1.19, and 1.34, was inaccurate. Ten surveillance procedures were affected.

The probable consequences caused by non-compliance with Technical Specification Definitions are:

1. The inability to satisfy Technical Specification operability requirements, resulting in entry into an LCO action statement.

2. Uncertainty of the actual operational status of equipment not tested.

3. Operation of equipment not in compliance with Technical Specifications.

C. Non-Incorporation of Amended Technical Specifications

Administrative Procedure 01-S-06-12, Revision 5, "GGNS Surveillance Program", had no effective program to ensure that surveillance procedures were revised to comply with amended Technical Specifications. The probable consequences of an ineffective update program would have been the performance of surveillances that were not in compliance with the GGNS Technical Specifications.

D. Non-Conservatism

Procedure acceptance criterias were less conservative than Technical Specifications required. For example, some instrument setpoints used tolerances not within the limits of Technical Specifications or erroneously listed incorrect units. Twenty-three procedures were affected.

The probable consequences of this problem would have been the operation of equipment not in compliance with Technical Specifications.

E. Mis-Scheduling of Required Surveillances

The following specific mis-scheduling problems involving required surveillances were discovered by the Surveillance Review Team:

1. Procedures incorrectly stated the surveillance frequency requirements. Seventy procedures were affected.

2. Procedures incorrectly stated and/or did not include the operational conditions for which the surveillance was applicable. Eighty-one procedures were affected.

3. Time response procedures incorrectly stated the required test frequency of individual channels or subsections. Thirty-five procedures were affected.

The probable consequences of mis-scheduling required surveillances are:

1. Surveillance requirements not satisfied before the late date. This would require entry into an LCO action statement.

2. Surveillance procedures not being performed during the applicable operational conditions. This would require entry into an LCO action statement.

3. Surveillances being performed at a greater rate than the Technical Specification requires. This would not violate Technical Specifications but could create a manpower shortage for performing other required surveillances.

F. Inadequate Document Cross-Reference

The following specific problems involving inadequate document cross-references were discovered by the Surveillance Review Team:

1. Procedures specifying "normal" valve position were not in accordance with the Technical Specifications, FSAR, or the System Operating Instructions. Thirteen procedures were affected.

2. Steps were not provided in surveillance procedures to return safety related valves and switches to their "normal" or "as found" positions upon completion of a test when their positions were changed as a result of a surveillance. Sixteen procedures were affected.

3. Procedures referenced a System Operating Instruction or Integrated Operating Instruction to perform a surveillance or sequence of steps, however, the SOI or IOI did not actually perform the surveillance or sequence of steps to the desired end result. Fourteen procedures were affected.

The probable consequences of this problem would have been:

1. Surveillance requirements not being performed, resulting in the entry into an LCO action statement.

2. Equipment not returned to the "normal" operational configuration at surveillance completion.

G. Head Correction Factors

The calibration procedures of pressure transmitters were found to be inaccurate due to miscalculation of the transmitter head factor. The miscalculation was the result of using head height of the transmitters' designed location, but not the specific as-built transmitter location. All procedures which calibrate pressure transmitters were reviewed and corrected, as necessary, for this problem. The operation of pressure, flow, and level detection devices and their associated trips or alarms outside the allowed tolerances established by Technical Specifications is a probable consequence of the inaccurate head correction problem.

H. Technical Specification Non-Conformity to As-Built Conditions

Changes were made to the Technical Specifications to account for as-built plant conditions. ~~The as-built conditions conform to the systems described and analyzed in the~~ FSAR and approved by the NRC ~~in its operating license review.~~ The changes were necessary to correct inadvertent errors in the Technical Specifications when the license was issued rather than to change any physical features of the plant.

The procedures satisfying Technical Specification surveillance requirements have been reviewed by the Surveillance Review Team for compliance with the changes. The procedures have been revised as necessary. The probable consequences of not revising the procedures would have been non-compliance with Technical Specification surveillance requirements.

Table 1 references the amended Technical Specification number, the document containing the Technical Specification change technical evaluation, the number of surveillance procedures affected, and summary of the Technical Specification change.

Table 1

Technical Specification Number	AECM Number (Item Number)	Surveillance Procedures Affected	Summary of the Technical Specification Change
Table 2.2.1-1	83-0314 (1)	7	More conservative setpoints per NSSS specifications.
Table 2.2.1-1 Table 3.3.4.2-2	83-0356 (4)	4	Revised setpoint values more conservative than current values.
Table 3.3.2-1	83-0180 (29)	1	Addition of valves to listing.
Table 3.3.2-2	83-0370 (4)	8	Reflects actual conditions rather than nominal conditions.
Table 3.3.2-2 Table 3.3.3-3	83-0338 (2&3)	2	Revision of setpoints per NSSS specification, within bounds of previous analysis.
3.3.2-3	83-0180 (16)	1	~~MSIV isolation not a function of this~~ instrumentation.
Table 3.3.3-2	83-0356 (1)	2	Revised values more conservative than previous analysis.
Table 3.3.3-2	83-0370 (5)	11	Revised timer delay to incorporate tolerance, still within bounds of analysis.
Table 3.3.7.1-1 & Table 4.3.7.1-1	83-0207 (11)	1	~~Provides two trip systems for additional radiation monitor~~ installed over approved fuel storage area.
Table 3.3.7.3-1 & Table 4.3.7.3-1	83-0180 (30)	2	~~Direct [illegible] sensors at 162 ft. level not monitored. Differential Temperature [illegible] house elevation is provided as~~ required parameter.
Table 3.3.7.12-1 & Table 4.3.7.12-1	83-0180 (19)	2	~~Automatic isolati[illegible] not a function of noble gas monitor.~~ isolation provided by vent[illegible]ion exhaust monitor.

Technical Specification Number	AECM Number (Item Number)	Surveillance Procedures Affected	Summary of the Technical Specification Change
3/4.6.1.3 3/4.6.2.3	83-0314 (10)	1	Change reflects that pressure instrumentation is provided for each air lock door inflatable seal rather than the air lock door seal system air tanks (flasks).
Table 3.7.4-2	83-0314 (14)	2	Added SRVs to surveillance table.
Table 3.7.6.5-1	83-0254 (6)	3	Provides proper notation for hose station locations.
Table 3.7.8-1	83-0207 (4)	1	Lower temperature limits agree with actual qualification temperature as required by NRC evaluation.
Table 3.8.4.1-1	83-0180 (14)	2	Revised the Trip Setpoint for the 6.9 KV circuit breakers to reflect the locked rotor current rise due to residual voltage. Provides equivalent protection of equipment.
Table 3.8.4.2-1	83-0180 (23)	3	Added valves to surveillance table.
3.9.1	83-0180 (26)	1	Deleted fuel grapple and SRM count rate interlocks.
3.9.1	83-0207 (6)	1	No longer are air vacuum breakers testing to be conducted by another suitable means.
4.1.3.1.4	83-0370 (10)	1	Deleted individual test that cannot be run separately; test still retained as part of another test.
Table 4.3.3.1-1	83-0314 (5)	5	Solid State digital systems allow only testing of overall delay, not individual inputs.
4.6.1.4	83-0338 (8)	1	Original values from purchase specification, revised values from functional test.
4.6.4.4	83-0180 (7)	1	Explosive valves not included in TIP system, not required for primary containment.

Technical Specification Number	AECM Number (Item Number)	Surveillance Procedures Affected	Summary of the Technical Specification Change
4.6.6.3.D.2	83-0338 (9)	1	Reflects a more conservative pressure drop for filter bank.
4.6.6.3.D.3	83-0314 (11)	1	Change adds "manual initiation" to the list of SGTS actuation signals and allows verification of test signals by LOGIC SYSTEM FUNCTIONAL TEST.
4.6.7.1	83-0207 (12)	1	Deleted since ~~specified system has no piping penetrations through containment~~ not applicable to GGNS.
4.7.2	83-0207 (5)	2	Deleted since GGNS design is ~~single path system and has no bypass valves.~~
4.7.2.D.2	83-0314 (13)	1	Change adds "manual initiation" to the list of CR emergency filtration system actuation signals and allows verification of test signals by LOGIC SYSTEM FUNCTIONAL TEST.
4.8.1.1.1	83-0338 (12)	3	Deletes surveillance requirement ~~on unnecessary existing feature (automatic transfer to another offsite source).~~
4.8.1.1.2	83-0207 (9)	10	Revised to reflect faster Diesel Generator start time; agrees with NRC evaluation.
4.8.1.1.21.16	83-0180 (22)	3	The word "engine" replaced the word "generator" such that item f reads "engine bearing temperature high (11 and 12 only). Item j was appended to reflect applicability to D/G 13 only.
Table 4.8.2.1-1	83-0180 (15)	2	~~different battery type.~~ New limits reflect manufacturer's specifications.
4.8.3.1.1 & 4.8.3.2.1	83-180 (12)	1	~~Voltage instrumentation not present on MCCs/panels;~~ sufficient voltage instrumentation present on busses on LCs.
4.9.12	83-0180 (25)	1	~~Not appropriate for Horizontal Tube Transfer System.~~

Technical Specification Number	AECM Number (Item Number)	Surveillance Procedures Affected	Summary of the Technical Specification Change
3.6.4, 4.6.1.1 Tables 3.3.2-1, 3.3.2-2 3.3.2-3, 3.6.4-1, 3.6.6.2-1, and 4.3.2.1-1; and B3/4.6.4, B3/4.6.6	83-0449 (1) and 83-0492 (1)	58	Nomenclature corrections, addition of valves to surveillance tables, reduction in closure times to agree with accident analysis, adjustment of closure times to agree with AMSE Section XI testing, realignment of valve groups according to isolation actuation.
4.4.7, Table 3.6.4-1	83-0492 (2)	1	Revised to allow MSIV and any other valves that can be tested in other than COLD SHUTDOWN or REFUELING to be tested with the plant hot but before reaching 600 psig.
Table 3.3.3-1, 4.3.3.1-1	83-0422 (15)	3	Redefines "operability" range for HPCS until first refueling outage due to water level instrumentation inaccuracies at low pressure.
Table 3.6.4.1	83-0356 (18)	2	[redacted] change to prevent automatic tripping of RHR jockey pumps; needed to prevent potential damage from waterhammer.
4.4.2.1.2.b, 4.4.2.2.1.b Table 3.3.3-1	83-0338 (7)	3	Provisions of Technical Specification 4.0.4 suspended to allow plant to attain operating conditions necessary of ADS trip system surveillance testing (one time Technical Specification exception).
4.1.3.1.4.a	83-0422 (13)	1	Provisions of Technical Specification 4.0.4 suspended to allow plant to attain operating conditions necessary for scram discharge volume surveillance testing (one time Technical Specification exception).
Table 3.3.2-1 Table 3.3.3-1	83-0356 (16)	12	[redacted] configuration.
Table 3.3.7.1-1	83-0356 (10)	0	Increases the number of minimum operable channels.
3.4.2.1	83-0314 (8)	2	Change revises the drift allowance for the relief valve function of the safety/relief valves to coincide with the design specification of these valves.

Technical Specification Number	AECM Number (Item Number)	Surveillance Procedures Affected	Summary of the Technical Specification Change
3.4.2.2	83-0314 (9)	2	Change revises the drift allowance for the relief valve function of the safety/relief valves to coincide with the design specification of these valves.
3.7.6.2 4.7.6.2	83-0422 (8)	3	[redacted] spray/sprinkler system for surveillance.
3.7.6.4 4.7.6.3 4.7.6.4	83-0422 (3)	4	[redacted] release levers but not valves. Redefinition of actuation and system operability surveillance.
Table 3.8.4.1-1	83-0370 (7)	2	[redacted] nce; revision of nomenclature.
4.1.3.2.B	83-0356 (9)	1	Allows entry into operational mode to test after maintenance or modifications.
4.3.7.5-1	83-0422 (12)	1	Increases surveillance frequency for hydrogen analyzers.
4.5.1.B	83-0370 (8)	5	Reflects test line pressure requirements to conform to ASME Section XI.
4.6.6.1.B.2	83-0370 (11)	1	Increase in pressure requirement.
4.6.6.3 4.7.2 B3/4.6.6 B3/4.7.2	83-0449 (3)* (Re-submittal of 83-0422 Item 14, 83-0356, Item 2)	1	[redacted] heater continuity assured by other elements of testing.
4.6.6.3.D.3	83-0314 (11)	3	Redefinition of functional testing, actual component performance test on same schedule

Technical Specification Number	AECM Number (Item Number)	Surveillance Procedures Affected	Summary of the Technical Specification Change
4.8.1.1.2	83-0338 (13)	3	~~System load shedding revised~~ to agree with FSAR.
4.8.1.1.2	83-0422 (10)	3	Reflects rated load of diesel generators.
4.8.1.12.D.2	83-0422 (2)	3	Revision due to nomenclature; largest load agrees with component table in FSAR.
4.7.2.D.2	83-0314 (13)	3	Redefinition of functional testing; actual component performance test on same schedule.
Table 3.3.3-1 Table 4.3.3.1-1 Base Figure 3/4.3-1	83-0422 (15)	0	~~Changes make the Technical Specifications consistent with plant design.~~ Further, they clarify that the required functions of the HPCS initiation instrumentation do not always include injection and that false indications of reactor water level due to instrumentation design and calibration requirements do not affect the safe operation of the plant. Changes to table applicable until restart following the first refueling outage. Change to base figure is a permanent change.

SECTION 1

I. Technical Specification Inconsistency

Several modifications were made to Technical Specifications to maintain internal consistency within the Technical Specifications. None of the changes involved a significant relaxation of the criteria used to establish safety limits or the bases for limiting safety system settings or limiting conditions for operation.

These administrative changes affected several surveillance procedures that the Surveillance Review Team revised as necessary to reflect the amended Technical Specification.

The consequence of not revising Technical Specifications and procedures would be the potential misinterpretation of surveillance requirements.

Table 2 references the amended Technical Specifications, the document containing the technical evaluation of the change and the number of procedures affected.

SECTION 1

Table 2

Technical Specification Section	AECM Number	Surveillance Procedures Affected
3.2.2	83-0338	1
Table 3.3.2-2	83-0180	2
Table 3.3.6.2 & Section 4.1.4.2	83-0180	1
3.7.1.3, 4.7.1.3	83-0314	2
3.8.1.1	83-0356	2
Table 4.3.3.1-1	83-0370	9
Table 4.3.3.1-1	83-0180	6
Table 4.3.6.1-1	83-0180	2
Table 4.3.6.1-1	83-0180	4
Table 4.3.7.12-1	83-0207	3
4.5.3.1, 4.6.3.1	83-0370	4
4.7.7.2	83-0422 (Resubmittal of 83-0314, Item 15)	3
4.8.4.3	83-0422	1
Table 4.3.7.5-1	83-0422	2
3.1.3.1	83-0422	0
Table 3.3.4.2-1	83-0207	4

J. Technical Specification Editorial or Nomenclature Errors

Several modifications were made to Technical Specifications which were administrative in nature and were necessary to correct editorial and nomenclature errors. None of these changes involved a significant relaxation of the criteria used to establish safety limits or the bases for limiting safety system settings or limiting conditions for operation.

The consequences of not revising Technical Specifications would have been the possible misinterpretation of Technical Specification requirements.

Table 3 references the amended Technical Specification and the document containing the technical evaluation of the change.

SECTION 1

Table 3

Technical Specification Section	AECM Number	AECM Item Number
Table 3.3.2-1	83-0180	6
4.4.6.1.3	83-0207	3
4.8.1.1.2.d.9	83-0207	13
6.5.2.8	83-0207	22
3.7.5	83-0254	1
Table 3.3.2-1	83-0314	3
Table 3.3.3-3	83-0314	4
Table 3.3.7.1-1	83-0314	6
Table 4.3.7.12-2	83-0314	7
Table 3.3.7.1-1	83-0338	5
4.6.7.3	83-0338	10
3.11.1.1	83-0338	15
3.11.1.2	83-0338	15
3.11.2.2	83-0338	15
3.11.2.3	83-0338	15
3.7.10; 4.7.10	83-0370 and 83-0565	2 3
Table 3.6.4-1	83-0180	1
Table 3.6.4-1	83-0180	2
Table 3.3.3-2	83-0180	5
Table 3.6.4-1	83-0180	9
3.1.3.2.B	83-0180	10
Table 4.3.7.11-1	83-0180	11
Table 1.1	83-0180	17
Table 3.6.6.2-1	83-0180	18

SECTION 1

Technical Specification Section	AECM Number	AECM Item Number
Table 3.3.7.1-1	83-0180	21
Table 3.3.7.5-1	83-0180	24
Table 3.3.2-1	83-0180	27
Table 3.3.2-2	83-0180	27
Table 3.3.2-3	83-0180	27
Table 4.3.2.1-1	83-0180	27
Table 3.3.7.2-1	83-0180	32
Table 4.3.7.2-1	83-0180	32
3.11.1.3	83-0180	34
6.9.1.12.K	83-0207	1
Table 4.3.1.1-1	83-0207	2
Table 3.3.3-2	83-0207	7
Table 3.3.2-3	83-0207	10
Table 4.3.7.11.1	83-0207	17
3.5.1	83-0207	20
4.7.4	83-0207	21
4.7.5.3	83-0254	2
3.3.2; 3.6.6.1; 3.6.6.2; 3.6.6.3; 3.7.1.1.3; 3.7.2; 3.8.1.2; 3.8.2.2; 3.8.3.2; Table 3.3.2-1; 3.3.7.1-1; 4.3.2.1-1; 4.3.7.1-1	83-0314	2
Table 3.3.7.9-1	83-0411	1
	and 83-0565	1
Table 4.3.1.1-1	83-0422	1
Table 3.7.6.6-1	83-0422	4
3.3.7.9; Table 3.7.8-1	83-0422	5
6.9.1.5; 6.9.1.12	83-0565	17
6.5.2.2	83-422	9

K. Proposed Technical Specification Changes

Due to the large number of Technical Specification changes required, the changes were prioritized, based upon the operational mode requirements necessary to achieve criticality, power ascension, and commercial operation. Some proposed changes have been received as Technical Specification Amendments 7, 8, 9, 10, and 11 while others are undergoing NRC review or being prepared by MP&L for NRC submittal. Table 4 provides a list of Technical Specifications yet-to-be amended and the document containing the technical evaluation of the change.

SECTION 1

Table 4

Proposed changes to Technical Specifications

Technical Specification	AECM Number (Item Number)	Summary
3.3.2-1.2.E 4.3.2.1-1.2.E	83-0356 (8)	Resolves Technical Specification conflict to perform required Condenser Vacuum Surveillance.
Table 3.3.7.9-1	83-0253 (8)	Deletion of some smoke detectors.
3.4.2.1	83-0373 (1)	Reflects a design change to SRV low-low set logic.
Table 3.6.4-1	83-0356 (18)	To support implementation of a design change package needed to correct a design deficiency.
Table 3.6.4-1	83-0449 (2) (Partial submittal of 83-0373, Item 4)	Makes basis for maximum valve isolation times consistent; comply with ASME Section XI requirements.
3.7.6.4 4.7.6.4 4.7.6.3.1 4.7.6.3.2.B.1	83-0254 (5)	Revision to conform with as-built GGNS design.
3.9.2.C	83-0207 (19)	Redefinition of applicability requirements.
4.3.7.5-1	83-0356 (13)	Alternate method for calibration of containment/drywell area radiation monitors.
4.3.7.5-1	83-0356 (14)	Increases calibration frequency.
4.5.1.C.2.B	83-0356 (11)	Maintain consistency between Technical Specifications and system design specifications.
4.5.1.C.A.2.A	83-0356 (15)	Correction to LCPI A & B low pressure setpoints to reflect plant design.
4.7.6.1.1.E.1	83-0254 (3)	Deletion of requirement not applicable to GGNS design.
4.7.6.1.3.A.	83-0254 (4)	Provide consistency between GGNS Technical Specifications and Standard Technical Specifications of NUREG-0123.

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Technical Specification	AECM Number (Item Number)	Summary
4.8.1.1.2.A.5 4.8.1.1.2.D.9	83-0356 (5)	Modification of requirements to better represent actual plant design and to comply with the intent of Regulatory Guide 1.108.
4.8.1.1.2.D.2	83-0207 (15)	Maintain consistency with the largest single load that can be applied to ESF busses during planned testing of the diesel-generators.
6.5.2	83-0180	Change the Advisor to Vice-President Nuclear Operations from a non-voting member to a voting member of the SRC.
6.5.2.10	83-0180	Maintain consistency with Operational Quality Assurance Manual regarding audits of SRC written reports.
4.8.2.1.D.2.B	83-0356 (6)	Revision of Division 2 125 Volt D.C. battery load profile to reflect as-built plant conditions and a planned change in the Division 2 inverter.
4.3.4.2.3 B 3/4.3-3	83-0356 (7)	Corrects the specification and bases to accurately reflect the breaker arc suppression requirement. The basis change clarifies the definition of the EOC-RPT system response time.
3.7.6.2 4.7.6.2.C	83-0338 (11)	Addition of spray/sprinkler system surveillance requirements; deletion of visual inspecions of pre-action sprinklers.
4.4.2.1.2.B 4.4.2.2.1.B Table 3.3.3-1	83-0338 (7)	Allows entry into Operational Condition 2 without performing the valve opening part of the LOGIC SYSTEM FUNCTIONAL TEST.
4.8.4.3.B	83-0314 (16)	Revision of setpoint tolerances to agree with equipment design specifications.
4.9.6	83-0314 (17)	To incorporate additional plant features not covered by Technical Specifications.
6.5.2.2	83-0338 (14)	Reflect change in MP&L corporate structure.
3.3.1	83-0565 (18)	Conformance of Technical Specifications with the Standard Technical Specifications

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Technical Specification	AECM Number (Item Number)	Summary
3.1.3.2	83-0565 (32)	Redefinition of Technical Specification applicability requirements.
Table 3.3.3-2	83-0565 (24)	Revision of setpoints per NSSS specifications, within bounds of previous analysis.
Table 3.3.2-3	83-0565 (10)	Pipe break detection circuitry modification for compliance with generic letter 83-02.
3.3.3	83-0565 (6)	Utilization of the most limiting LPCI response time to maintain consistency with FSAR.
3.3.3.2 3.3.5-2	83-0565 (21)	Revision of reference evaluation of suppression pool level instrumentation to maintain consistency with plant design.
3.3.6-1 4.3.6-1	83-0565 (13)	Redefinition of operational condition applicability requirement.
3/4.3.7.1 Table 3.3.7.1-1	83-0565 (5)	Inclusion of data inadvertently omitted by the NRC in Amendment 7.
3.4.1.4	83-0565 (4)	Redefinition of requirement applicability.
3.6.2.5 B3/4.6-3	83-0565 (22)	Reflects incorporation of one of the Humphrey concerns into plant design.
3.7.1.1 4.7.1.1	83-0565 (9)	Revised to reference all applicable operational conditions.
Table 3.7.6.5-1	83-0565 (23)	Addition of fire hose stations to list.
Table 3.7.8-1	83-0565 (33)	Change of temperature limits and changes to conform to Standard Technical Specifications.
Table 4.3.3.1-1	83-0565 (28)	Addition of surveillance requirement inadvertently omitted from Technical Specifications.

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Technical Specification	AECM Number (Item Number)	Summary
4.3.7.6.C Table 3.3.6-2	83-0565 (1)	Change SRM minimum count rate setpoints to prevent replacement of neutron source; within bounds of G.E. Rod Drop Analysis re-analysis.
Table 4.3.7.12-1	83-0565 (19)	[redacted]
Figure 6.2.2-1	83-0565 (35)	Change to Unit Organization Chart for more effective utilization of personnel resources.
6.5.1.2	83-0565 (20)	Expansion of PSRC membership.
Table 3.3.8-1	Unassigned (Not yet submitted)	[redacted]
Table 3.3.8-1	Unassigned (Not yet submitted)	Minimum operable channels listed are too few.
Table 3.3.5-1	83-0642 (1)	Minimum operable channel should be four for low-low level.

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Proposed Technical Specifications changes to correct editorial and nomenclature errors.

Technical Specification	AECM Number (Item Number)
Table 3.3.1-1	83/0565 (27)
3.3.2 Table 3.3.2-2	83/0565 (16)
3.3.3 Table 3.3.3-1	83/0565 (7)
Table 3.3.7.1-1 Table 4.3.7.1-1 Table 3.3.7.12-1	83/0565 (2) (Resubmittal of AECM-83/0370, Item 6)
Table 3.4.3.2-1 Table 3.4.3.2-2	83/0565 (8)
B3/4.6.1.7	83/0565 (14)
4.5.3.1 3.6.3.1 B3/4.6.3	83/0565 (15)
3/4.6.7	83/0565 (12)
Table 3.7.4-2	83/0565 (31)
3.8.1.2	83/0565 (11)
Table 3.8.4.2-1	83/0565 (25)
4.8.1.1.2.D.9	83/0565 (26)
5.1.3 Figure 5.1.1-1 Figure 5.1.3-1	83/0565 (29)
6.10.2	83/0565 (30)

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Technical Specification	AECM Number (Item Number)	
Table 3.7.6.6-1	83/0422 (4)	(Resubmittal of AECM-83/0254, Item 7)
4.8.4.2.1.A	83/0356 (12)	
4.3.4.2.3 B3/4.3.3	83/0356 (7)	(Not a Technical Specification Change - one time exemption to the operating license)

SECTION 2

Corrective Action

The following describes the corrective actions used to ensure that all Technical Specifications and Surveillance Procedures are technically adequate; and the program established to effectively incorporate, control and implement regulatory requirements:

1. A Surveillance Review Team, headed by the Technical Engineering Supervisor, was established to review/rewrite all existing and new surveillance procedures to ensure technical adequacy and compliance to GGNS Technical Specifications and 10CFR50 - Appendix J. A preliminary review of compliance with ASME Section XI regulations, which are not required until commercial operation, was conducted.

2. A standard criteria checklist was developed to serve as a review guideline and method of review documentation.

3. A surveillance punchlist was established and maintained to identify and track discrepancies internally within the Surveillance Team. This included all procedural problems, needed Technical Specification changes, and programmatic problems encountered by the Surveillance Review Team.

4. The Integrated Operating Instruction and Operating Logs were reviewed by the Surveillance Review Team to ensure that the surveillance requirements associated with operational mode changes are adequately incorporated.

5. Revision 6 of 01-S-06-12, "GGNS Surveillance Program Administrative Procedure" was written to ensure prompt incorporation of Technical Specification changes into applicable surveillance procedures.

6. Revision 0, 09-S-05-7, "GGNS Technical Specifications/Surveillance Program Master Cross-Index" was developed and issued to aid plant personnel in the use of Technical Specifications and Surveillance Procedures.

7. A cross-reference index of surveillance procedure requirements to operational mode requirements was developed to aid plant personnel in the use of Technical Specifications and Surveillance Procedures.

8. The computerized surveillance scheduling program was reviewed by the Surveillance Review Team to ensure procedures are scheduled in accordance with Technical Specification requirements. This presently is an effective program, however, the Review Team is looking at other methods to further enhance the program.

9. Section Level Procedure Philosophy Statements and Technical Specification Position Statements are being prepared as necessary to document the clarification of specific procedures and technical specification requirements as an aid to plant personnel.

10 To satisfy the requirements of the Logic System Functional Tests per Technical Specification Definition 1.22, the following overall test philosophy was developed by the Surveillance Review Team:

Instrument calibration procedures are used to accomplish testing from the sensor to a convenient overlap point in the logic. A functional test then overlaps with the calibration procedure and verifies the logic and the required action of the actuated device.

11. Instead of retesting equipment tested in another procedure to obtain an equipment response time from which a system response time could be calculated, the following approach was developed to satisfy system response time testing per Technical Specification Definitions 1.12, 1.13, 1.19, and 1.34:

    System Response Time Test procedures were revised to reference the procedure and step to which equipment response times were tested. This data is collated to produce a series of sequential, overlapping or total steps such that the entire system response time is measured.

12. Applicable Plant Quality Deficiency Reports, Material Non-Conformance Reports and Quality Assurance Corrective Action Requests concerning the Surveillance Program were reviewed and corrective actions were coordinated with MP&L QA and Plant Quality.

13. The "Grand Gulf Nuclear Station Operations Enhancement Program", was established to improve the short and long-term safety, reliability, and operating effectiveness of the Grand Gulf Nuclear Station. More specific goals include:

    - Improve management controls necessary for safe and reliable operations.

    - Increase the proficiency and quality of licensed personnel.

    - Emphasize procedure awareness and regulatory concern.

    - Establish efforts to improve the utilization/effectiveness of management and licensed operating personnel.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations

FROM: James P. O'Reilly, Regional Administrator

SUBJECT: GRAND GULF SURVEILLANCE PROCEDURES

The enclosed memorandum is the proposed response to Commissioner Gilinsky's March 2, 1984, memorandum on Grand Gulf Surveillance Procedures.

James P. O'Reilly

Enclosure:
Proposed Response to
Commissioner Gilinsky's memo
of 3/2/84

cc w/encl.:
Harold R. Denton
Richard C. DeYoung