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U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station Unit 1
Docket No. 50-416
License No. NPF-29
Reply To A Notice Of Violation
Failure To Perform Required TS Surveillance
Report No. 50-416/96-17 (GNRI-96/00234), dated 11/25/96

GNRO-96/00142

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/96-17-01. During the preparation and review of the response to the violation of Technical Specification Surveillance requirement 3.3.6.2.1 (50-416/96017-01) questions were raised by plant staff as to why a violation instead of an NCV was issued. In keeping with Grand Gulf's efforts to continually improve we would take this opportunity to increase our understanding of the regulations as explained in NUREG 1600 and the NRC Inspection Manual 0610 section 05.02 - Thresholds of Significance. In reviewing this event it is not clear to us what specific criteria were used to determine that this event was of "more-than-minor" significance. To ensure our safety focus, we would appreciate further clarification of how these guidelines are used in this event.

Yours truly,

JJH/CDH

attachment Response to Notice of Violation 50-416/96-07-01
cc: Mr. R. B. McGehee (w/a)
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Notice of Violation 96-17-01

Technical Specification Surveillance Requirement 3.3.6.2.1 states, in part, to perform a channel check every 12 hours for secondary containment isolation instrumentation, which includes the fuel handling area pool sweep exhaust radiation high high instrumentation.

Contrary to the above, from September 20-22, 1996, five required channel checks for the fuel handling area pool sweep exhaust radiation high high instrumentation were not performed in that operators read and recorded data from incorrect alternate instrumentation.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

The root cause of the missed surveillances was less than adequate work practices in that self-checking and error detection techniques were not applied to ensure the correct trip unit numbers were denoted on the information tag. Although the incorrectly identified trip unit is very similar to the desired trip unit, self-verification of the task did not detect the error when placing the information tag. Operators performed five subsequent surveillances by reading the information tag hanging on the cavity of the removed recorder and verbatimly following the directions provided on the information tag. However, if they had verified the name of the trip units being read against the parameter being measured on the Tech Spec rounds, they could have detected the error earlier.

A contributing cause of the missed surveillances was that there was no peer check performed to verify the accuracy and correctness of the task performed by the reactor operator. If performed, a peer check had the potential to reveal the incorrect trip unit numbers specified on the information tag. Correction of this deficient condition as a result of the peer review could have been accomplished prior to exceeding any Tech Spec and/or TRM time limits.

III. Corrective Steps Which Have Been Taken and Results Achieved

- The correct trip units were checked and channel checks were completed with satisfactory results.
- The information tag was removed and replaced with a tag which denoted correct trip units numbers.
- The use of self verification techniques and the use of the peer checks was discussed with the reactor operator and shift supervisor.
- The violation and use of peer checks were discussed with each shift via night orders and shift supervision.
- Labels were permanently installed adjacent to each Control Room ventilation radiation monitor that is used for Tech Spec/TRM data collection and has an associated trip unit which senses the same parameter. The labels specify the trip

units to be used for Tech Spec/TRM data collection when the recorder is out of service.

IV. Corrective Steps to be Taken to Preclude Further Violations

All corrective actions have been completed. No further actions are planned in response to this violation.

V. Date When Full Compliance Will be Achieved

All corrective actions have been completed.