



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

P. O. BOX 1640, JACKSON, MISSISSIPPI 39215-1640

September 25, 1985

O. D. KINGSLEY, JR.  
VICE PRESIDENT - NUCLEAR OPERATIONS

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: 0260/0840/L-860.0  
Additional Information on  
PCOL-85/11 and PCOL-85/14  
AECM-85/0304

This letter provides information that supplements previous requests for an amendment made by Mississippi Power and Light (MP&L) by submittals on August 12, 23 and 30, 1985.

In accordance with the provisions of 10 CFR 50.30, three (3) signed originals and forty (40) copies of the requested supplement to an amendment are enclosed. The attachment provides the complete technical justification and discussion to support the requested supplement to an amendment. This attached information has been reviewed and accepted by the Plant Safety Review Committee (PSRC) and the Safety Review Committee (SRC).

Based on the guidelines presented in 10 CFR 50.92, it is the opinion of MP&L that this proposed supplement to an amendment involves no significant hazards considerations.

In accordance with the requirements of 10 CFR 170.21 an application fee of \$150 was included with each of the original submittals made on August 12, 23 and 30, 1985. Since this letter provides information that supplements these original submittals, MP&L has determined that no additional application fee is required.

MP&L requests NRC Approval of item one (1) of this submittal as soon as possible. The two individuals referenced in this submittal will be utilized as Shift Supervisors and these additional SRO licenses will allow progression toward a six shift rotation, provide for enhanced shift maintenance coordination and allow contractor phase out.

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Items two (2), three (3), and four (4) of this submittal are expansions or supplements to previously submitted items which are needed to support design changes currently scheduled to be performed during an outage planned to commence in October 1985.

As a matter of good operating practice, we will maintain frequent contact with your staff during the review period to ensure that the date of issuance of these changes will coincide with completion of the proposed modifications.

Yours truly,



ODK:vog

Attachments: Additional Information on GGNS PCOL-85/11 and PCOL-85/14

cc: Mr. J. B. Richard (w/a)  
Mr. R. B. McGehee (w/a)  
Mr. N. S. Reynolds (w/a)  
Mr. H. L. Thomas (w/o)  
Mr. R. C. Butcher (w/a)

Mr. James M. Taylor, Director (w/a)  
Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. J. Nelson Grace, Regional Administrator (w/a)  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N. W., Suite 2900  
Atlanta, Georgia 30323

Dr. Alton B. Cobb (w/a)  
State Health Officer  
State Board of Health  
Box 1700  
Jackson, Mississippi 39205

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

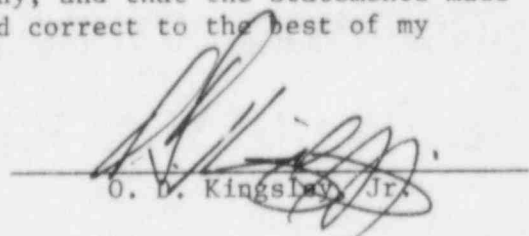
LICENSE NO. NPF-29

DOCKET NO. 50-416

IN THE MATTER OF  
MISSISSIPPI POWER & LIGHT COMPANY  
and  
MIDDLE SOUTH ENERGY, INC.  
and  
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

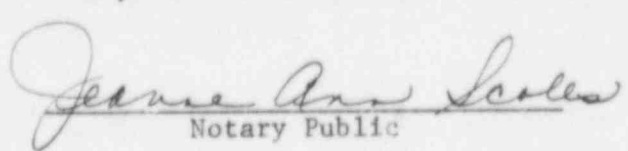
I, O. D. Kingsley, Jr., being duly sworn, stated that I am Vice President, Nuclear Operations of Mississippi Power & Light Company; that on behalf of Mississippi Power & Light Company, Middle South Energy, Inc., and South Mississippi Electric Power Association I am authorized by Mississippi Power & Light Company to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Vice President, Nuclear Operations of Mississippi Power & Light Company; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

  
O. D. Kingsley, Jr.

STATE OF MISSISSIPPI  
COUNTY OF HINDS

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 25th day of September, 1985.

(SEAL)

  
Notary Public

My commission expires:

My Commission Expires Sep. 21, 1987

1. NLS-85/09 (PCOL-85/14 additional information)

SUBJECT: Technical Specification 6.3.1, page 6-6

DISCUSSION: It is proposed to add a "#" footnote to the March 28, 1980 NRC letter reference in Technical Specification 6.3.1. This proposed "#" footnote will read as follows:

# Except that the experience and other training information provided in a letter to the NRC dated July 29, 1985 are acceptable for the individuals listed in that letter.

Mississippi Power & Light (MP&L) Company submitted a proposed change to Facility Operating License, NPF-29, in a letter from O. D. Kingsley, Jr to Mr. Harold R. Denton dated August 30, 1985. During discussions with your staff, it was determined that the proposed "#" footnote was also required in Technical Specification 6.3.1. This proposed change supplements the previous submittal.

JUSTIFICATION: Present Technical Specification 6.3.1 and 6.4.1 endorses Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter concerning qualifications of reactor operators. Section A states that "Applicants for senior reactor operator license shall have 4 years of responsible power plant experience. Responsible power plant experience should be that obtained as a control room operator (fossil or nuclear)". For plants like Grand Gulf, these regulations do not adequately consider the situation where a plant has not held an operating license for 4 years so that operators can obtain this required experience. Grand Gulf Unit 1 was issued an operating license in June 1982 and a full power operating license in August 1984.

Section A of the March 28, 1980 NRC letter allows exceptions to experience requirements for precritical applicants to accommodate the fact that their facility has not yet been in operation. The proposed technical specification change is similar to this exception in that Grand Gulf has not been in operation long enough for its operators to obtain four years of control room experience.

MP&L is requesting this technical specification exception for two individuals whose experience and training is provided in a letter dated July 29, 1985 from Mr. L. F. Dale to Dr. J. Nelson Grace. These two candidates were selected as senior reactor operator candidates because of their proven performance working as licensed control room operators. They have demonstrated strong supervisory abilities as they have directed activities of non-licensed personnel. These two individuals have been determined to be qualified to fill a supervisory role in the Grand Gulf Operations Department and if licensed will be promoted to Shift Supervisors to allow staffing for a six shift rotation.

#### SIGNIFICANT HAZARDS CONSIDERATIONS:

There is a need at Grand Gulf to upgrade certain reactor operators to senior reactor operators in order to meet and maintain shift manning requirements, move into a six-shift rotation, and provide for attrition. Staffing projections and plans are predicated on the ability to upgrade reactor operators to senior reactor operators. The proposed exception for these two individuals is based on their licensed operator experience on Grand Gulf, their completion of an extensive training program, and their demonstrated supervisory skills.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the two individuals seeking the technical specification exception are highly trained on Grand Gulf and each has held a reactor operator license on Grand Gulf for more than two years.

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed exception will apply to individuals that are experienced licensed operators on Grand Gulf and who have demonstrated supervisory skills in directing the work of other operators.

The proposed change does not involve a significant reduction in a margin of safety because the two individuals involved have extensive experience on Grand Gulf as licensed and unlicensed operators.

Therefore, the proposed change involves no significant hazards considerations.