



MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi
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September 30, 1985

NUCLEAR LICENSING & SAFETY DEPARTMENT

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
 Units 1 and 2
 Docket Nos. 50-416 and 50-417
 License No. NPF-29
 File: 0025/L-860.0
 Response to Generic Letter 83-28,
 Item 3.2
 AECM-85/0265

REFERENCE: 1) AECM-84/0533 dated December 14, 1984

Generic Letter 83-28 requested response to several NRC positions derived from an evaluation of the Salem ATWS events. Attached is the Mississippi Power & Light (MP&L) response to Item 3.2 of the generic letter. This item deals with post-maintenance testing of safety-related components.

Final responses for all items of the generic letter have been provided with the exception of Item 4.5.3. That response will be provided within 90 days of NRC issuance of an evaluation of the BWR Owners Group report, NEDC-30844, as previously committed to in MP&L letter (AECM-85/0157) dated May 14, 1985. Please advise if further information is required.

Yours truly,

8510070452 850930
 PDR ADOCK 05000416
 P PDR

L. F. Dale
 Director

ARR/GWS/SHH:vcg
 Attachment

cc: (See Next Page)

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Member Middle South Utilities System

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cc: Mr. J. B. Richard (w/a)
Mr. O. D. Kingsley, Jr. (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

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101 Marietta St., N. W., Suite 2900
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Action 3.2

POST-MAINTENANCE TESTING (ALL OTHER SAFETY-RELATED COMPONENTS)

POSITION

The following actions are applicable to post-maintenance testing:

- 1) Licensees and applicants shall submit a report documenting the extending of test and maintenance procedures and Technical Specifications review to assure that post-maintenance operability testing of all safety-related equipment is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.
- 2) Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.
- 3) Licensees and applicants shall identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which are perceived to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval.

RESPONSE

Reference 1 provided MP&L's response to Item 3.1 of the generic letter which concerned post-maintenance testing of reactor trip system components. The procedures described in the Item 3.1 response control post-maintenance testing for all safety-related equipment and are, therefore, applicable for addressing Item 3.2 as discussed below.

Action 3.2.1 requires that post-maintenance operability testing of all safety-related equipment be conducted and that the testing demonstrate that the equipment is capable of performing its safety functions before being returned to service. Grand Gulf Nuclear Station (GGNS) administrative procedure 01-S-07-2, "Test and Retest Control", establishes the controls that are applied to testing, retesting, inspection and special tests that are performed to verify the operability of permanent plant equipment once activities which removed the equipment from service are completed. This procedure incorporates many of the concerns addressed in the Salem Restart Evaluation, SECY 83-98E, including:

- 1) Control/Standardization of post-maintenance testing requirements.
- 2) Provision for Plant Operations review of test results and development of additional tests prior to returning equipment to service.
- 3) Inclusion of a table of Technical Specifications which require post-maintenance testing in 01-S-07-2 in order that testing required by Technical Specifications can be provided with each Maintenance Work Order (MWO) package.

Procedure 01-S-07-2 requires that the Maintenance Superintendents be responsible for reviewing MWO's and work packages and providing test, retest or inspection instructions required to verify that equipment meets design requirements. Additionally, the Operations Shift Superintendent/Supervisor is responsible for verifying the operability of plant equipment prior to accepting equipment for operation. Also the Surveillance Coordinator, In-Service Inspection Coordinator, and Section Supervisors provide assistance in determining retest requirements for Technical Specifications, ASME Section XI/ISI equipment and equipment not under Operations control. Equipment is determined to be operable if it is capable of performing its intended function(s). Evaluation and disposition of unsatisfactory tests, retests or inspections is performed prior to returning the equipment to operation.

Action 3.2.2 requires that appropriate test guidance from vendor/engineering recommendations is included in procedures and Technical Specifications, where required. Procedure 01-S-07-2 contains a table which lists Technical Specifications with post-maintenance testing requirements and references applicable operability tests to be performed after maintenance. Plant maintenance procedures have been written to and are controlled by procedure 07-S-01-2, "Maintenance Section Directive Author's Guide", which provides uniform guidelines for preparation of maintenance procedures. These guidelines require the inclusion of applicable prerequisites and precautions, required material (i.e. vendor manuals or instructions) and operability requirements in each maintenance/testing procedure. Therefore, where applicable, the maintenance procedures contain information from vendor manuals and engineering recommendations related to equipment maintenance and operability testing. In addition, another GGNS administrative procedure is used to cross-reference technical manuals to applicable plant procedures.

Action 3.2.3 requests that licensees identify any post-maintenance testing requirements in existing Technical Specifications which are perceived to degrade rather than enhance safety. To date, MP&L has not identified any specific post-maintenance test requirements in the Technical Specifications which appear to degrade safety. However, should continued operation later reveal a post-maintenance test requirement in the Technical Specifications which degrades safety, MP&L will submit an appropriate change to the staff for approval. As discussed in MP&L letter (AECM-85/0157) dated May 14, 1985, MP&L is an active participant in the BWR Owners Group Technical Specification Improvement Committee whose main goal is to evaluate possible relaxation of selected surveillance testing intervals. MP&L plans to submit technical specification changes identified through the Owners Group effort for NRC review as deemed appropriate for extension of surveillance testing intervals. MP&L is also evaluating potentially excessive testing requirements in Technical Specification LCO Action Statements for the diesel generators and plans to submit changes to these testing requirements as appropriate.

In summary, MP&L believes that the procedures which are currently in place to control post-maintenance testing meet the intent of Item 3.2 of the generic letter. These procedures should adequately control post-maintenance testing to ensure that safety-related equipment is fully tested and determined to be capable of performing its intended safety function(s) prior to its return to service. This constitutes a final response to Action 3.2 of Generic Letter 83-28.