



OLIVER D. KINGSLEY JR.
Vice President
Nuclear Operations

April 1, 1988

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Report No. 50-416/88-01-01
dated March 3, 1988
(MAEC-88/0044)
AECM-88/0068

System Energy Resources, Inc. hereby submits response to violation
50-416/88-01-01.

Yours truly,

[Handwritten signature]
ODKingsley, Jr.

ODK:bms
Attachment

- cc: Mr. T. H. Cloninger (w/a)
- Mr. R. B. McGehee (w/a)
- Mr. N. S. Reynolds (w/a)
- Mr. H. L. Thomas (w/o)
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Notice of Violation

Technical Specification (TS) 6.8.1 requires that written procedures be established, implemented and maintained covering the activities recommended in Regulatory Guide (R.G.) 1.33, Revision 2, February 1978. R.G. 1.33 recommends procedures covering the Control Rod Drive System. Section 4.4 of System Operating Instruction 04-1-01-C11-1, Control Rod Drive Hydraulic System, addresses the hydraulic control unit nitrogen charging method.

Contrary to the above, on February 2, 1988, the licensee failed to follow Procedure 04-1-01-C-11-1 to properly store a nitrogen bottle inside containment.

I. Admission of Denial of the Alleged Violation

System Energy Resources, Inc. (SERI) admits to the alleged violation. This violation had no affect on the health and safety of the public.

II. The Reason for the Violation if Admitted

The reason for the improper storage of nitrogen bottles inside the containment was due to the lack of adequate procedural controls concerning handling of nitrogen bottles and awareness of Operations Shift personnel of the potential missile hazards these bottle may present.

System Operating Instruction (SOI) 04-1-01-C11-1 was changed, per a previous NRC commitment made in the response to Notice of Violation 50-416/85-03-03 (AECM-85/0104), to ensure Control Rod Drive (CRD) charging carts are returned to their storage locations and secured following accumulator charging activities. However, the SOI did not provide the necessary guidance to ensure all nitrogen bottles, both "empty" and "full", were returned to their storage locations.

Previous practices dictated placing empty bottles on the floor, in lieu of in the storage racks. This action would indicate that the bottle was empty. The Labor/Decontamination Section would be notified for removal by the Shift Supervisor.

Additionally, the Auxiliary Building Round Sheet requires verification, once every 24 hours, that the charging bottles are secured in their storage locations; however, it did not address the appropriate actions to be taken if loose nitrogen bottles were found in the area.

SERI did not have adequate procedural controls which explicitly governed the removal of nitrogen bottles from the CRD area.

III. The Corrective Steps Which Have Been Taken and the Results Achieved

The following actions have been taken to ensure nitrogen bottles are properly stored:

1. Quality Deficiency Report (QDR #070-88) was initiated to document and resolve improper storage of nitrogen bottles.

2. Temporary identification stickers have been obtained and are in use to identify bottle status (e.g. full, in-use, empty). Purchase orders for future nitrogen bottles will require a three-part identification sticker to be supplied with each bottle.
3. System Operating Instruction 04-1-01-C11-1 was changed to require that nitrogen bottles be secured in either the stored charging cart or the storage rack following CRD charging activities.
4. The Auxiliary Building Round Sheet has been revised to include verification that there are no loose nitrogen bottles in the CRD area.

IV. The Corrective Steps Which Will Be Taken To Avoid Further Violation

To preclude further violation of this nature, the following actions have been taken:

1. The Operations Department Night Orders were issued to notify operations shift personnel of the changes made to SOI 04-1-01-C11-1 regarding the proper storage of nitrogen bottles inside containment.
2. The Auxiliary Building Round Sheets (which includes the containment) were changed to include a generic walkdown to check specifically for any compressed gas bottles which may be improperly stored. The round sheets will be further revised to provide the appropriate corrective actions to be taken which include prompt removal or proper storage of the bottles.
3. A memo was issued to all plant personnel from the General Manager to reemphasize the importance of proper compressed gas bottle storage inside the plant.
4. Plant Administrative Procedure 01-S-07-9, "Housekeeping" will be changed to provide specific guidance to check for compressed gas bottles in the plant and to call for prompt removal or proper storage of bottles.
5. Operations management will conduct briefings with each shift to stress the importance of preventing missile hazards in areas containing safety related equipment.

V. Date When Full Compliance Will Be Achieved

1. Full compliance has been achieved for Section IV items 1 and 3.
2. Full compliance will be achieved for Section IV items 2, 4, and 5 by April 30, 1988.