SYSTEM ENERGY RESOURCES, INC.

OLMER D. KINGSLEY, JR.
Vice President
Nuclear Operations

July 8, 1988

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

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
SERI Response to Inspection Report
No. 50-416/88-06 Regarding GGNS
Emergency Operating Procedures
(MAEC-88/0139)
AECM-88/0135

The Nuclear Regulatory Commission (NRC), during the Emergency Operating Procedure (EOP) inspection of April 11-18, identified certain concerns with the Grand Gulf EOPs and EOP development process. At the exit meeting, System Energy Resources, Inc. (SERI) described corrective actions being implemented or planned to ensure these concerns are properly addressed. The subject inspection report requested SERI to formally submit these plans to the NRC for corrective action. Per the inspection report and information received from the NRC Senior Resident Inspector, the Emergency Procedure Improvement Program (EPIP) is hereby submitted. This is an updated version of the program presented at the NRC exit meeting.

The NRC and SERI independently reached the conclusion that the existing procedures could be implemented by shift operations which would ensure placing the plant in a safe condition. In light of these conclusions, SERI developed two action plans. The short term plan ensures that the EOPs and EOP development program will meet current SERI EOP commitments. These actions include correcting EOP technical concerns, updating EOP development documents, incorporating certain human factors changes, and verifying and validating the revised EOPs as necessary. The revised EOPs and supporting documents are currently scheduled to be in place by the end of July 1988. The long term plan involves revising the EOPs to meet Revision 4 of the BWR Owners Group Emergency Procedure Guidelines. This effort will result in significant changes to the flowcharts. SERI will as a part of this effort make further human factors improvements.

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SERI has determined that the primary cause leading to the concerns described in the NRC inspection report was inconsistent EOP program management and SERI management oversight following initial development. A SERI policy establishing clear EOP lead and supporting responsibilities along with involvement of Quality Programs (QP) is included as part of the short term improvement plan.

SERI believes that the actions taken for the Emergency Procedure Improvement Program will result in the proper development and long term maintenance of high quality EOPs. Should it be necessary to make any significant changes to the EPIP program or schedule, the GGNS Resident Inspector will be appropriately notified and briefed of these actions.

Yours truly,

ODK:bms
Attachment

cc: Mr. T. H. Cloninger (w/a)
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GGNS EMERGENCY PROCEDURE IMPROVEMENT PROGRAM

		SCHEDULED COMPLETION
A.	SHORT-TERM ACTIONS	
1.	Re-establish V&V for changes made to EOPs since Rev. 0 was turned over.	
a.	Complete and issue revised process control procedures to be consistent with PGP.	Complete
(1)	Writers Guide	
(2)	Verification and Validation (V&V) Procedure	
b.	Document deviations from the PGP in letter to NRC.	8/31/88
c.	V&V of EOPs	
(1)	Conduct review of all EOPs to the revised PSTG to ensure technical adequacy.	Complete
(2)	Review EOPs against the new Writers Guide.	Complete
(3)	Conduct Human Factors review of present Emergency Procedures.	Complete
(4)	Revise EOPs according to new program and as required by outcome of the above.	Complete
(5)	Utilize new V&V procedure to ensure quality EOPs and proper documentation.	Complete
(6)	Incorporate changes required by V&V and issue new EOPs.	7/31/88

		SCHEDULED COMPLETION
2.	PSTG	
	a. Revise and reformat PSTG to include "PSTG step" information.	Complete
	b. Perform complete comparison of PSTG with the EPGs. Correct any discrepancies found.	Complete
	c. Perform verification of PSTG	Complete
	d. Incorporate PSTG changes required by verification and issue PSTG	7/31/88
3.	Human Factors (HF)	
	a. Review EOPs to new Writers Guide criteria.	Complete
	b. Revise EOPs to correct short term HF issues.	Complete
4.	EOP/Plant Labeling	
	a. Perform necessary reviews to identify discrepancies between plant labels and EOP descriptions. Review criteria should adopt concept that equipment labeling and EOP should be "exact".	Complete
	b. Revise equipment labels or EOPs as appropriate.	7/31/88
5.	EP-2 (Level Control)	
	Revise EP-2 to resolve entry level concern.	Revised. Scheduled for issue by 7/31/88.
6.	ONEP vs. EP Overlap	
	a. Perform review to identify overlap areas.	Complete
	b. Revise ONEPs as necessary to address overlap concerns.	Revised. Scheduled for issue by 7/31/88.

		SCHEDULED COMPLETION
7.	NRC Technical Comments on EOPs	
	a. Evaluate NRC technical comments	Complete
	b. Address and resolve any items assigned a "short term" priority.	8/31/88
8.	"Satellite" Procedures Referenced in EOPs	
	a. Identify other plant procedures referenced from EOPs in which EOP relies on action to be accomplished per the plant procedure (e.g., containment venting).	Complete
	b. Establish criteria for format and presentation of information in a "satellite" procedure.	Complete
	c. Revise "satellite" procedures as necessary to conform with criteria established for such procedures.	Revised. Scheduled for issue by 7/31/88.
9.	General Physics Comments	
	Address and resolve comments resulting from 3/88 GP review of EOPs.	Complete
10.	Quality Programs (QP) Involvement	
	a. Establish and execute QP audit activities to confirm that this Improvement Program is carried out in an effective and quality manner.	7/31/88
	b. Establish appropriate measures to insure proper QP involvement in EOP program in the future.	7/31/88

		SCHEDULED COMPLETION
11.	DCP Impact Review	
	a. Review current process in place to review DCPs for EOP impact.	Complete
	b. Revise process as appropriate to insure that implemented facility changes are properly reviewed for EOP impact and that EOPs are revised in timely manner.	Complete
	c. Conduct verification/validation of EOPs to ensure no adverse DCP impact on EOPs.	Complete
12.	Root Cause Assessment	
	a. Categorize and evaluate findings resulting from preparation for and execution of this EOP inspection.	Complete
	b. Evaluate root cause for each category of findings.	7/31/88
	c. Identify and implement EOP programmatic corrective actions to address root causes identified.	7/31/88
13.	SERI Program Management of Emergency Procedures	
	a. Establish clear lead and supporting responsibility assignments for maintenance of EOPs and supporting documentation in a quality fashion.	7/31/88
	b. Develop and implement the necessary overall programmatic controls governing future EOP program management. Program must contain the following characteristics as a minimum:	7/31/88
	(1) Team approach, with single organization accountable for overall project management responsibilities.	

		SCHEDULED COMPLETION
	(2) Human Factors Engineering expertise represented on team and in key aspects of EOP control processes.	
	(3) Training of team members and all other personnel involved in EOP review, revision, and oversight.	
	(4) Proper level of independent expert review in control processes.	
	(5) Thorough QP involvement to assess quality and effectiveness of program.	
	(6) Participation in BWROG/HCOG efforts to improve EOPs.	
14.	NRC Questions	
	a. Obtain Comprehensive Listing of NRC Inspector Questions	Complete (From Inspection Report)
	b. Address/Resolve Any Inspection Questions	
	(1) Incorporate as many comments as feasible into the short term program.	Complete
	(2) Include the remainder of the comments in the long term program.	See Item B.3
B.	LONG-TERM ACTIONS	
1.	EPG Rev. 4	
	a. Follow NRC review of EPG Rev. 4. Participate with BWROG in resolution of NRC SER issues (following issuance of SER).	Ongoing
	b. Evaluate EPG Rev. 4, and develop a schedule for revision of GGNS EOPs.	9/30/88

		SCHEDULED COMPLETION
2.	Human Factors Issues (Long Term)	
	Follow industry developments on human factor improvements in EOPs, Writers Guide, etc. Make determination if changes to the EOP program based on new human factors standards in industry is appropriate for GGNS.	9/30/88
3.	NRC Inspector Technical Comments (Long Term)	
	a. Identify comments that will not be addressed on short term basis (Item A.14 above).	Complete
	b. Establish schedule for addressing these comments.	9/30/88