

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

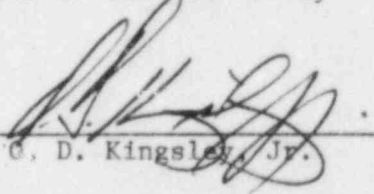
LICENSE NO. NPF-29

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 28th day of February, 1986.

(SEAL)

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Paul J. Richardson
Notary Public

My commission expires:

Oct. 27, 1987

1. (NPE-86/06)

SUBJECT: Technical Specification Table 3.6.4-1; Page 3/4 6-30

DISCUSSION: The proposed technical specification change results from a design change that added a more accessible containment isolation valve, E12-F394, which is designated in Technical Specification Table 3.6.4-1 as the RHR to Head Spray Valve. The technical specification change for the revised designation of this valve was transmitted to the NRC via AECM-85/0228, dated August 12, 1985 and was approved by the NRC on November 8, 1985 as Amendment 7 to Facility Operating License No. NPF-29. The previous technical specification change contained a commitment to the NRC that MP&L would revise the maximum closing time of valve E12-F394 within 90 days after completion of the second ASME Section XI closure time test.

This test to determine closure time was completed on November 30, 1985. It is therefore proposed that Table 3.6.4-1 be revised to reflect the final maximum closing time of 43 seconds and that the footnote marked "##" on Technical Specification Page 3/4 6-30 be deleted. The revised valve closing time satisfies the accepted NRC formula for calculating closure times for isolation valves as presented in Technical Specification Bases 3/4.6.4. The proposed change to correct the valve closure time in Table 3.6.4-1 is considered purely administrative in nature.

JUSTIFICATION: Valve E12-F394 is located on the Residual Heat Removal (RHR) System Head Spray Line to the reactor vessel. This valve serves as the inboard containment isolation valve, with valve E12-F023 serving as the outboard containment isolation valve for penetration number 18. Although these two valves perform the same function (containment isolation), their closing times are different because the valves were purchased with different closure time design specifications. However, because the operability of valves E12-F394 and E12-F023 was not assumed in the FSAR for any safe shutdown or accident analysis, the valves have no analytical closure times, as defined in the FSAR.

In the previous submittal (August 12, 1985), an initial closure time of 35 seconds was chosen as a reasonable interim closing time for valve E12-F394. This closure time was chosen because valve G33-F253, which is of the same manufacturer and was procured through very similar purchase specifications as valve E12-F394, is listed in the technical specifications as having a maximum closure time by technical specification bases criteria of 35 seconds. The final maximum closing time for valve E12-F394 of 43 seconds has been defined according to the criteria established in the Technical Specification Bases 3/4.6.4. Maximum closing times for containment isolation valves which do not have analytical closing times are calculated by taking the allowable ASME Section XI margin (25% of test closure time for this valve), multiplying it by two, and adding it to the test closure time. The ASME Section XI test closure time for valve E12-F394 was determined by testing to be 28.8 seconds.

The containment isolation valve E12-F394 is normally closed and its operability is not assumed in any accident or fire hazards analysis. Its maximum closing time of 43 seconds meets all the applicable requirements described in Technical Specification Bases 3/4.6.4 and assures the containment isolation function. Changing Technical Specification Table 3.6.4-1 to reflect this revised closing time is considered an administrative change since it relies on already accepted NRC criteria for determining valve closure times and places the correct closure time in the table.

SIGNIFICANT HAZARDS CONSIDERATIONS:

The proposed changes reflect the revised maximum closing time of 43 seconds for valve E12-F394. This time was determined using the guidelines for maximum closure times for containment and drywell isolation valves established in Technical Specification Bases 3/4.6.4. For valves defined in the FSAR to be without analytical closure times, the margin of safety and the consequences of an accident will not be affected as long as valve closure is assured. The containment isolation valve E12-F394 is normally closed and its operability is not assumed in any accident or fire hazards analysis. Valve E12-F394 operability is tested using ASME Section XI criteria.

The technical evaluation of whether or not the final closure time for valve E12-F394 involves significant hazards considerations is centered on three standards:

- A. First Standard - involve a significant increase in the probability or consequences of an accident previously evaluated.

The FSAR accident analyses took credit for closure of 34 reactor coolant and containment isolation valves. Valve E12-F394 is not one of these valves. Its closing time, therefore, is not a factor in any previously evaluated accident. The final maximum closing time of valve E12-F394, which meets all requirements identified in Technical Specification Bases 3/4.6.4, does not involve any increase in the probability or consequences of an accident previously evaluated.

- B. Second Standard - Create the possibility of a new or different kind of accident from any accident previously evaluated.

The final maximum closing time of 43 seconds for valve E12-F394 assures it will function appropriately as the reactor coolant boundary or containment isolation valve. The final maximum closing time of 43 seconds was determined using the Technical Specification Bases 3/4.6.4 and meets all requirements and guidelines defined in these Bases for valves without analytical closure times. Since the closure time of valve E12-F394 is not considered in the mitigation

of any accident analyses and the operability of the valve is not affected by the proposed change, revising the closure time does not create the possibility of a new or different kind of accident from any previously evaluated.

- C. Third Standard - Involve a significant reduction in a margin of safety.

The FSAR accident analyses took credit for closure of 34 reactor coolant and containment isolation valves. Valve E12-F394 is not one of these valves. For valves without analytical closure times, the margin of safety will not be affected as long as valve closure is assured. To ensure the operability of valve E12-F394, the valve is tested using ASME Section XI criteria. Since the proposed change will not affect the operability of the valve, the change in maximum closing time for valve E12-F394 does not involve a significant reduction in a margin of safety.

The change to Table 3.6.4-1 is considered purely administrative in nature since the revised maximum closing time satisfies the accepted method in Bases 3/4.6.4 for calculation of valve closure times and involves no significant hazards considerations.