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MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi
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February 14, 1986

NUCLEAR LICENSING & SAFETY DEPARTMENT

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

Dear Dr. Grace:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
File: 15521/15524
Report No. 50-416/86-45
dated January 15, 1986
(MAEC-86/0015)
AECM-86/0041

Mississippi Power & Light Company hereby submits response to violations
50-416/85-45-06, -07, -11, and deviation 50-416/85-45-02.

Yours truly,

L. F. Dale
Director

MFN/SHH:bms
Attachment

- cc: Mr. O. D. Kingsley, Jr. (w/a)
- Mr. T. H. Cloninger (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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DEVIATION 50-416/85-45-02

NOTICE OF DEVIATION

Final Safety Analysis Report (FSAR) paragraph 9.4.5.4 states that the Engineered Safety Feature (ESF) room coolers are periodically inspected to ensure that all normally operating equipment is functioning properly and standby components are periodically tested to ensure system operation.

Contrary to the above, as of December 20, 1985, the licensee did not have a program to test and inspect the ESF room coolers to ensure their operability as required by the FSAR.

I. CORRECTIVE ACTION

In order to ensure that Grand Gulf Nuclear Station ESF room coolers are operable, Technical Special Test Instruction (TSTI) 1P41-85-001-1-S was developed and performed.

II. ACTIONS TAKEN TO AVOID FURTHER DEVIATION

A General Maintenance Instruction will be developed, which establishes the inspection and testing program for the ESF room coolers.

III. DATE WHEN FULL COMPLETION WILL BE ACHIEVED

Full Compliance will be achieved by March 28, 1986.

NRC Violation 50-416/85-45-06

Notice of Violation

10CFR50, Appendix J, states in part that for type C local leak rate tests, each valve to be tested shall be closed by normal operation and without any preliminary exercising or adjustments.

Contrary to the above, on November 7, 1985, the licensee had to use a valve wrench and excessive force to get valve C41F150 closed tight enough to pass the required type C local leak rate test.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. This violation had no effect on the health and safety of the public.

II. THE REASON FOR THE VIOLATION IF ADMITTED

The personnel involved in operating valves and troubleshooting valve leakage did not realize that use of a valve wrench to tighten a valve was not the normal means of closing a manual isolation valve. A contributing factor was that there were no guidelines in leak rate testing procedures to clarify the normal methods for closing manual valves for the test.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The valve in question was disassembled under Maintenance Work Order (MWO) M58058 and examined for the cause of the difficulty in operating the handwheel. The cause was determined to be galling of surfaces due to lack of lubricant. The valve was polished, lubricated, and reassembled, and another LLRT was performed.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

A revision to surveillance procedures, 06-ME-1M10-0-0002, Containment Integrated Leak Rate Test, and 06-ME-1M61-V-0001 Local Leak Rate Test will include clarifications on the prohibition of valve wrenches and the use of other tightening aids for the closure of manually operated valves.

In addition to the revision, maintenance task card ME4555 was issued to ensure proper lubrication of the valve.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by February 21, 1986.

Violation 50-416/85-45-07

Notice of Violation

10CFR50, Appendix B, Criterion II states in part that the Quality Assurance Program shall take into account the need for special controls, process, test equipment, tools and skills to attain the required quality; and the program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.

Contrary to the above, an electrician, not trained in the protection characteristics and interfaces of feeder breakers, performed an operation which resulted in the loss of power to an Engineered Safety Feature (ESF) electrical bus and subsequent loss of Residual Heat Removal (RHR) System A shutdown cooling.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. This violation had no effect on the health and safety of the public.

II. THE REASON FOR THE VIOLATION IF ADMITTED

As described in MP&L's letter (AECM-85/0362) dated November 18, 1985, transmitting LER 85-039-0, the electrician, who was a certified electrical maintenance journeyman, was not knowledgeable of the relationship between protective relay circuit and other feeder breakers. This lack of knowledge was the cause of an inadvertent loss of power to the Division 2 ESF bus and the subsequent loss of RHR "A" shutdown cooling.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Certified electrical maintenance journeyman were instructed in the relationship of protective relay circuits to other feeder breakers. An appropriate caution note was added to the calibration procedure.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

The actions taken in III above are considered sufficient to prevent further violation.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

Violation 50-416/85-45-11

Notice of Violation

Tech Spec 6.8.1 requires written procedures be established, implemented, and maintained covering activities recommended in App. A of Regulatory Guide 1.33. Regulatory Guide 1.33 requires procedures for performing maintenance that can affect the performance of safety related equipment.

Contrary to the above:

- a. Maintenance procedure 07-S-09-40, Rev. 1, paragraph 6.3.2.d.(1) states "when maintenance retests (special instructions) are required that do not exist, and are subsequently developed by a Maintenance Planner, an Engineer will review the maintenance retest and approve, disapprove, or modify accordingly." This was not followed in that the special instruction included in MWO M57687 does not have the approval signature of the Responsible Maintenance Engineer.
- b. MSP 07-S-09-40, Rev. 1, paragraph 6.3.2 requires that the RME specify maintenance retest. This was not followed in that the retests contained in MWO M57687 were specified by a Mechanical Supervisor.
- c. PMI 07-S-24-P75-E001AE-5, Rev. 0, Periodic Oil Change of the Standby Diesel Woodward Governor Model #EGB-3S-C, paragraph 7.10.1 states "Run engine 15 minutes, stop engine, drain governor oil and fill with fresh oil." This was not followed in that the retest included in MWO M57687 did not specify the draining of the governor oil and refill with fresh oil following a 15 minute run.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company admits to the alleged violation. This violation had no effect on the health and safety of the public.

II. THE REASON FOR THE VIOLATION IF ADMITTED

Various maintenance activities were nearing completion with each work document requiring and sometimes duplicating retests. The Mechanical Supervisor in charge of the work activities wished to coordinate the retests and accomplish them through a projected test sequence. He provided an MWO and special instruction to Maintenance Planning to accomplish this effort.

The Mechanical Planner obtained the system engineer review and the 10CFR50.59 screening. The system engineer performed an inadequate review. The MWO was issued and work commenced.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

PQDR's 198-85, 199-85, 206-85, and 208-85 were issued to track this deficiency. The Emergency Diesel Generator (EDG) was disassembled, inspected, reworked as necessary, reassembled, and retested. These retests were developed by the system engineer and approved by Operations Management.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

Applicable Plant Staff Directives will be revised to allow anyone within Plant Staff to initiate a special instruction. The special instruction shall be reviewed by maintenance engineering with the review documented. Special instructions written for major rotating equipment shall also be reviewed by Operations Management with the review documented. Special instructions will use System Operating Instructions (SOI's) when possible. Training for maintenance personnel will be conducted on this incident.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by February 21, 1986.