



MISSISSIPPI POWER & LIGHT COMPANY

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March 7, 1986

O. D. KINGSLEY, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

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
Response to Generic Letter 83-28,
Items 3.1 and 3.2
AECM-86/0059

An NRC letter dated December 3, 1985 (MAEC-85/0413) from W. R. Butler to J. B. Richard requested additional information or a final response for Generic Letter 83-28 Items 3.1 (3.1.1 and 3.2.1) and 3.2 (3.1.2 and 3.2.2). Attached is the Mississippi Power & Light (MP&L) final response to those items.

Please advise if further information is required.

Yours truly,

ODK:lwm
Attachment

cc: Mr. T. H. Cloninger (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
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REPORT ADDRESSING SECTIONS 3.1 AND 3.2
OF GENERIC LETTER 83-28

Mississippi Power & Light (MP&L) makes no formal procedural distinction between safety related Reactor Trip System components and other safety related components when determining the post maintenance testing requirements. Therefore, this report addresses both Sections 3.1 (3.1.1 & 3.2.1) and 3.2 (3.1.2 & 3.2.2) of Generic Letter 83-28.

COMMENT ON 3.1.1 & 3.2.1

The MP&L response to Section 3.1.1 & 3.2.1 of Generic Letter 83-28 does not include a statement that a review was made of the actual working level maintenance and test procedures to assure that post-maintenance testing is required to be conducted and that the testing specified in the procedures demonstrates that the equipment is capable of performing its intended safety functions prior to being returned to service.

RESPONSE - Items 3.1.1 & 3.2.1

The Work Control Program used at Grand Gulf Nuclear Station (GGNS) does not require advance preparation of generic type retest procedures which are used over and over again. Instead, the program utilized allows the scope and type of work performed to dictate the testing/retesting required. The testing/retesting is identified for each specific work activity and is developed at the time the work plan is developed for that specific work activity.

Adequate post-maintenance testing (PMT) cannot be assured by relying solely on standard PMT requirements in procedures. The primary responsibility of MP&L is to ensure that PMT performed on safety related components is correct, complete and germane to the specific maintenance activities performed. PMT requirements are developed at GGNS on a case by case basis. This process is more adequately assessed by a review of the programmatic controls and built-in checks and reviews. Therefore, MP&L did not perform a review of GGNS's previously developed and completed work packages which include the specific test/retest instructions, but instead reviewed the programmatic controls and built-in checks and reviews. A discussion of this program is described in the following paragraphs.

Procedures which provide controls of activities at Grand Gulf Nuclear Station (GGNS) fall into three categories: (1) Plant Administrative Procedures being the highest level, (2) Section Procedures being the second level, and (3) Section Instructions being the lowest level. In this hierarchy, MP&L establishes programmatic controls in the Administrative Procedures and each section is required to specify in detail these controls down to their personnel through Section Procedures. Section Instructions are then left to detail specific guidance on such things as how to tear down a pump and put it back together, but does not cover how to retest the component.

Grand Gulf Nuclear Station (GGNS) Operations Manual includes Administrative Procedures 01-S-07-2, "Test and Retest Control" and 01-S-07-1, "Control of Work on Plant Equipment and Facilities". These two procedures provide management direction for the performance of work and retesting activities at GGNS and provide the guidance for implementing the appropriate requirements of ANSI 18.7 - 1976 and the approved MP&L Quality Assurance Program concerning maintenance and retest. The directions contained in these procedures are passed down through the hierarchy of procedures utilized at GGNS.

A review of the Section Level Procedures was conducted to determine if adequate controls are in place to ensure that PMT will be performed and that it will be sufficient to ensure operability before returning a component/system to service.

The controls in place require that the Maintenance Planner/Engineer develop a specific work package for each component/system worked on. The controls require that the specific retest requirements be developed/identified during this process. (See response to items 3.1.2 & 3.2.2 for additional details.) Development controls require that each work package be processed through a review/approval cycle consisting of an independent review by Quality Assurance and final approval by the appropriate Maintenance Discipline Superintendent.

The review revealed that additional special guidance has been developed for governing the generation of retest instructions for large rotating equipment. These controls which are in addition to that previously discussed require the use of the System Operating Instructions (SOI's) whenever possible. If the SOI cannot be utilized, the guidance specifies that the retest instructions be reviewed and that Plant Operations Management approve the retest instructions. This additional review provides further assurance of personnel and equipment protection and adequate retest requirements.

This review also revealed that there are specific requirements that appropriate surveillance tests be performed prior to returning a component/system to service when required to confirm operability. Additionally, a final determination is made by the Shift Superintendent/Supervisor that the component/system is capable of performing its intended function before declaring the component/system operable as defined by GGNS Technical Specifications.

The above described process has many built in checks, such as Quality Assurance, Engineering and Management reviews before and after work completion; therefore, MP&L is of the opinion that the presence of these procedure controls provides assurance that post-maintenance testing has and will demonstrate that equipment is capable of performing its intended safety functions prior to being returned to service.

COMMENT ON 3.1.2 & 3.2.2

The MP&L response to Sections 3.1.2 & 3.2.2 of Generic Letter 83-28 does not include a statement that a review was performed of those test and maintenance procedures to verify that appropriate vendor and engineering recommendations had been incorporated.

RESPONSE - Items 3.1.2 & 3.2.2

The Work Control Program used at Grand Gulf Nuclear Station (GGNS) does not utilize generic type test procedures which are used over and over again. Instead, as described in response to Items 3.1.1 and 3.2.1, the program utilized, allows the scope and type of work performed to dictate the testing/retesting required. Therefore, each work instruction becomes a unique entity for a given work item. This type of process is more adequately assessed by a review of the programmatic controls and built-in checks. Therefore, MP&L did not conduct a review of each previously completed individual work instruction, but instead reviewed the programmatic controls and built-in checks.

Maintenance Section Procedure 07-S-09-40, "Control of Retest Requirements", details how retest requirements will be determined to ensure permanent plant equipment conforms to specified design requirements after maintenance activities. Included in this procedure are guidelines establishing a review of the work package to ensure that maintenance retest requirements can be satisfied by existing written and approved MP&L vendor documentation or parts thereof. Additionally, GGNS utilizes the expertise of vendor representatives whenever it is deemed necessary.

The Responsible Maintenance Engineer/Field Engineer provides work instructions and/or special instructions which are limited to use with the work package for which the instruction was generated. Special instructions undergo appropriate engineering review of applicability to the specific task for which it was generated. Special instructions consist of a detailed review of material (e.g., vendor manuals, drawings, standards, specifications, handbooks, etc.) in order to generate appropriate test requirements. Additionally, vendor representatives are utilized to provide additional expertise when deemed necessary.

Special note should be made of arrangements made with General Electric, the GGNS Nuclear Steam Supply System vendor, who provides Service Information Letters (SIL's), Service Advisory Letters (SAL's) or special engineering notification when the safety significance warrants special notification. This is especially true for the Reactor Trip System and MP&L utilizes this information as deemed appropriate.

By letter AECM-85/0157 dated May 14, 1985 MP&L committed to review and evaluate operating experience per INPO VETIP recommendations. The evaluation of these operating experiences is performed using approved procedures. Recommendations derived from the review process are transmitted to the appropriate MP&L organization for action including maintenance.

Grand Gulf's program for review of vendor technical manuals is described in Nuclear Plant Engineering Procedure 01-302, "Design Review Of Contractor Prepared Design Documents", which controls the receipt and review of incoming vendor documents including vendor manuals, SIL's, etc. Once a manual has been reviewed and approved for plant use, it is controlled by GGNS Administrative

Procedure 01-S-05-4, "Control Of Technical Manuals", which establishes the methods used to formally control the use, distribution, maintenance and revision of plant technical manuals. The objective of this procedure is to ensure that only the latest revision of any given manual is made available to support plant activities. In addition, Administrative Procedure 01-S-05-12, "Directive Submittal Requirements For Plant Technical Manuals" provides a method for formally tracking and cross-referencing which plant technical manuals are referenced in plant procedures.

MP&L has reviewed the appropriate administrative and section level procedures and has concluded that these procedures require the use of vendor and engineering recommendations when developing the retest instructions for a given work document.

As discussed above, the controls in place effectively ensure GGNS's test and maintenance procedures include adequate guidance to ensure that appropriate vendor and engineering recommendations are considered.