



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39215-1640

April 10, 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
File: 0260/0765/L-860.0
Proposed Departure from
STA Team Concept
AECM-86/0058

- References:
- (1) MP&L letter dated October 26, 1983,
J. P. McGaughy to H. R. Denton - AECM-83/0680
 - (2) MP&L Letter dated November 21, 1983,
J. B. Richard to J. P. O'Reilly - AECM-83/0750
 - (3) NRC Letter dated November 23, 1983,
R. C. Lewis to J. B. Richard - MAEC-83/0369

Mississippi Power and Light (MP&L) Company currently has a Shift Technical Advisor (STA) assigned to each of five operating shifts at Grand Gulf Nuclear Station (GGNS). These STAs report to shift management and perform on-shift core monitoring and management activities, provide advanced technical assistance to the operating shift complement and are stationed in the Control Room and available to perform the STA function if off normal or accident conditions dictate.

In compliance with commitments stated in the referenced letters, MP&L has assigned the STAs to a particular shift and the STAs have remained with that shift except when the shift is in training or the plant is in operating conditions 4 or 5. This "Team Concept" has served to strengthen the GGNS operations staff through the initial startup and power ascension test program. During the past eighteen months since MP&L received its full power operating license for GGNS, the operating staff has gained much experience from the transients associated with the startup test program and has significantly increased the size of the pool of qualified operations personnel.

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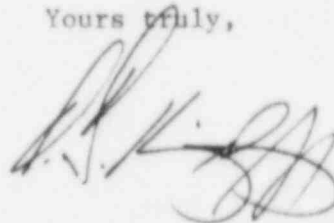
In mid-April, 1986, MP&L intends to implement a six shift operations rotation. This is a significant milestone in the maturity of the Grand Gulf plant. Subsequently, MP&L proposes placing the STAs on a rotation different from that of the operations shift rotation. The purpose of this letter is to request your review and approval of this departure from the "Team Concept".

The attachment to this letter describes the proposed plan and provides justification for the departure. MP&L requests your review and concurrence with this proposed plan. In accordance with the provisions of 10CFR170 an application fee of \$150.00 is enclosed.

Based on conversations with the NRC Project Manager an NRC response date of May 21, 1986 has been established. However, since approval of this proposal would, in MP&L's opinion, allow better utilization of STA resources, your expeditious review and approval of the proposal is requested.

If you require further information, please contact this office.

Yours truly,



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)
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

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

REMITTANCE ADVICE

CHECK DATE 03/04/86 VENDOR U S NUC REG COMM VENDOR NUMBER 929958 CHECK NO 03-0008

| INVOICE DATE | PURCHASE ORDER NO | INVOICE NUMBER / DESCRIPTION | VOUCHER NUMBER | GROSS AMOUNT | DISCOUNT | NET AMOUNT |
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| 03/04/86 | | 10CFR170 APPLICA FEE | 03-0282 | 15000 | | 15000 |
| <i>AECM- 86/0058</i> | | | | | | |

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TO THE
ORDER OF

U.S. NUCLEAR REGULATORY
COMMISSION
WASHINGTON, DC 20555

[Handwritten Signature]

SIGNED BY

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COUNTERSIGNED BY

Proposed Departure from the STA Team Concept

The STA function at GGNS currently is being performed via a five man shift rotation coincident with the operations shift rotation. The STA remains with a particular shift at all times the reactor is in operational conditions 1, 2, or 3. During the non-operational periods, the STA either works in the Technical Support Section or attends specified training.

Training for the STA engineers consists of:

(1) Annual Requalification Training

The STAs receive training in transient and accident analysis which is conducted through classroom lectures and simulator training. The STA engineers attend the simulator training with the operations personnel unless scheduling conflicts require separate simulator sessions.

(2) Required Reading Program

Through the Required Reading Program, the operations personnel and STA engineers maintain an awareness of plant design modifications, applicable procedure revisions and significant industry events. This program also includes supplemental information for the STAs in areas such as core performance monitoring and reactivity controls as specified by the Reactor Engineering Supervisor.

Procedures have also been established to ensure that the STA engineers attain sufficient knowledge of the current plant configuration prior to assignment to the shift. These procedures require STAs who are not currently assigned to a shift to stand periodic proficiency shifts and perform certain tasks in order to maintain their proficiency.

The adherence to the "Team Concept" with regard to shift operations has resulted in the following concerns:

- (1) The experience gained on shift by STA engineers is an invaluable mechanism for enhancing the overall strength of the engineering staff. However, the long periods of shift work required of the STA engineers make the job unattractive to engineers that would otherwise be good candidates for advancement through the STA function.
- (2) The strict adherence to "Team Concept" limits the positions available for engineering growth into the on-shift STA function.
- (3) The current STA rotation requires that STA engineers devote the majority of their time solely to the STA function whereas a larger shift rotation would allow use of these experienced STAs in other engineering functions.

Because of these concerns, MP&L is proposing herein to place the STA engineers on a shift rotation different from that of the operations shift rotation. This proposal would constitute a departure from "Team Concept" in that the STA engineer would no longer be solely dedicated to a particular shift. This departure would allow a larger number of STA qualified engineers to participate in the STA shift rotation when a larger pool of such personnel is available. This pool of experienced STA engineers would eventually provide a source of proven STA experienced engineers who would be available for the Senior Reactor Operator (SRO) training program thus providing a core of highly qualified licensed engineers. These licensed engineers would then be available for filling positions which required SRO license.

The benefits derived from such departure are as follows:

- (1) The departure will provide a broader base for gaining on-shift experience for the engineering personnel. This will provide more highly qualified personnel supporting the technical support and other engineering functions at GGNS.
- (2) A more attractive career path is provided for station engineers by reducing the period of time the engineer spends on-shift. This will encourage more qualified engineers to participate in the STA program and likewise encourage experienced engineers to remain with the program to eventually enter the SRO training program.
- (3) The increased STA rotation schedule will eventually provide a larger pool of individuals available for the SRO training program.
- (4) More qualified personnel will be available to fill the Emergency Plan job functions.
- (5) The larger shift rotation will provide a mechanism for resolving problems noted by the on-shift STAs during shift operations in that STA personnel when not on shift will be available to resolve those problems.
- (6) Separate shift rotations will provide STAs with a broader perspective on plant operations. Also, by not always rotating with the same shift, STAs can establish more independence in decision making, problem appraisal and making recommendations.

The "Team Concept" was adopted by MP&L to strengthen the overall operation shift experience level during the initial operation of GGNS Unit 1. Since that time, the operations staff has operated the plant through a rigorous startup test program and placed the unit in commercial operation. Approximately eighteen months of operation has significantly strengthened and seasoned the operating staff such that MP&L believes that this departure from the "Team Concept" will not adversely affect the operation of GGNS. It should be noted that the departure from the "Team Concept" in no way affects the qualifications of the STA engineer nor the NUREG-0737 (I.A.1.1) requirements for STAs. It is MP&L's belief that the overall effect of the departure from the "Team Concept" will be to strengthen the operating staff at GGNS.