



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

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

July 25, 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
Unit 1
Docket No. 50-416
License No. NPF-29
File: 0260/0840/L-860.0
Proposed Amendment to the Operating
License (PCOL-86/18)
AECM-86/0198

Reference: (1) AECM-86/0042 dated April 3, 1986

Mississippi Power & Light (MP&L) is requesting by this submittal, an amendment to Facility Operating License No. NPF-29, for Grand Gulf Nuclear Station (GGNS) Unit 1. The proposed amendment modifies License Condition 2.C.(33)(b) requiring that MP&L conduct a simulated loss of onsite and offsite alternating current power test.

As part of the resolution of TMI Action Plan (NUREG-0694) Item I.G.1, entitled "Operator Training During Low Power Testing", the NRC required all BWR applicants for an operating license to commit to performing an in-plant Station Blackout (SBO) Test. The NRC Staff objectives for such testing would include evaluation of plant response and enhanced operator training under SBO conditions. This requirement was incorporated into the GGNS operating license as License Condition 2.C.(33)(b). The Staff modified the basic requirement with NRC Generic Letter 83-24 dated June 29, 1983 to allow compliance through participation in the BWR Owners Group (BWROG) Program for TMI Action Plan Item I.G.1 if an applicant demonstrates that SBO test conditions would adversely impact or pose a hazard to plant equipment.

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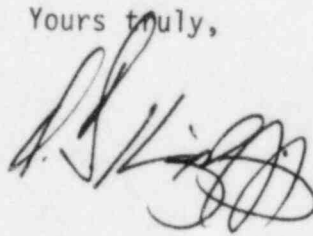
MP&L submitted a Station Blackout Report on April 3, 1986 (Reference 1) demonstrating the detrimental effects of the required test and proposing an alternate training/testing program that complies with the BWROG recommendations for alternate testing to satisfy the intent of SBO testing. The alternate training and test program has been initiated and will be completed before restart following the first refueling outage. Accordingly, MP&L is requesting the attached proposed change to the operating license to allow use of alternate training/testing to satisfy the I.G.1 requirement.

In accordance with the provisions of 10 CFR 50.30, three (3) signed originals and forty (40) copies of the requested amendment are enclosed. The attachment provides the complete technical justification and discussion to support the requested amendment. This amendment has been reviewed and accepted by the Plant Safety Review Committee (PSRC) and the Safety Review Committee (SRC).

Based on the guidelines presented in 10 CFR 50.92, it is the opinion of MP&L that this proposed amendment involves no significant hazards considerations.

In accordance with the requirements of 10 CFR 170.21, we have determined that the application fee is \$150. A remittance of \$150 is attached to this letter.

Yours truly,

A handwritten signature in dark ink, appearing to be a stylized name, possibly "D. S. [unclear]".

ODK:vog
Attachments: GGNS PCOL-86/18

cc: (See Next Page)

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

Dr. Alton B. Cobb (w/a)
State Health Officer
State Board of Health
Box 1700
Jackson, Mississippi 39205

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.

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 25th day of July, 1986.

(SEAL)

Jeanne Ann Scoles
Notary Public

My commission expires:

My Commission Expires Sep. 21, 1987

REMITTANCE ADVICE

CHECK DATE 07/22/86 VENDOR US NUC REG COMM VENDOR NUMBER 929958 CHECK NO. 07-0115

INVOICE DATE	PURCHASE ORDER NO.	INVOICE NUMBER / DESCRIPTION	VOUCHER NUMBER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
07/21/86		10 CFR 170 APPLICATION FEE <i>AECM-86/0198</i>	07-3272	15000		15000

DEPOSIT GUARANTY NATIONAL BANK
Jackson, Mississippi 39205

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MIDDLE SOUTH ENERGY, INC.
P.O. BOX 1640 • JACKSON, MISSISSIPPI 39205
JOINT ACCOUNT

CHECK NO. 07-0115

CHECK DATE		
MO.	DA.	YR.
07	22	86

DOLLARS	CENTS
\$150	00

PAY
TO THE
ORDER OF

U.S. NUCLEAR REGULATORY
COMMISSION
WASHINGTON, DC 20555

[Signature]
SIGNED BY

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COUNTERSIGNED BY

1) OLCR NLS-86/02

SUBJECT: Facility Operating License No. NPF-29, page 11 License Condition 2.C.(33)(b)

DISCUSSION: Mississippi Power & Light Company (MP&L) wishes to amend the Grand Gulf Nuclear Station (GGNS) Operating License replacing License Condition 2.C.(33)(b):

MP&L shall conduct a special test, Simulated Loss of Onsite and Offsite Alternating-Current Power Test, as described in the MP&L letter dated August 18, 1981. At least 4 weeks prior to performing the Special Test, MP&L shall provide a safety analysis for this test and its procedures to NRC for review and approval.

with the following:

MP&L shall demonstrate the adverse impact that a Simulated Loss of Onsite and Offsite power test will have on plant equipment and confirm that the BWR Owners' recommendations for compliance with I.G.1 will be implemented.

JUSTIFICATION: The requirement for performing an SBO test originated from TMI Action Plan Item I.G.1, "Training During Low Power Testing." This Action Plan item, as presented in NUREG 0694, requested that applicants, "...define and commit to a special low-power testing program approved by NRC to be conducted at power levels no greater than 5 percent for the purposes of providing meaningful technical information beyond that obtained in the normal startup test program and to provide supplemental training."

In a January 27, 1981 letter from the NRC, Mississippi Power & Light was requested to commit to performing an SBO test as part of TMI Item I.G.1.

MP&L committed to perform a Low-Power Test Training Program to be developed using the guidelines provided in the report "BWR Owners' Group Program for Compliance with NUREG 0737, Item I.G.1 Training During Low Power Testing" and also committed to perform a Station Blackout test.

The Grand Gulf Facility Operating License, NPF-29, consequently contained licensing condition 2.C.(33)(b) which required MP&L to conduct a simulated SBO test.

In NRC Generic Letter 83-24, the NRC modified their position on SBO testing by stating "...if it can be demonstrated that temperature and/or other SBO test conditions would adversely impact and pose a hazard to plant equipment, the BWR Owners' Group recommendations by themselves would constitute compliance with Item I.G.1...." MP&L submitted a Station Blackout report, transmitted by letter AECM-86/0042 dated April 3, 1986. Section 2.0 of this report provides justification for not performing the SBO test. This report shows that GGNS can withstand an SBO for at least 4 hours given no additional failures and points out the detrimental effect to plant components if SBO testing were allowed to progress to the point where temperature exceeds normal limits.

SIGNIFICANT HAZARDS CONSIDERATION:

1. MP&L has determined that no significant increase in probability or consequences of an accident previously evaluated exists due to this change. This change will not result in changes to hardware or operating procedures at GGNS. The object of "providing meaningful technical information beyond that obtained in the normal startup test program and to provide supplemental training" is fulfilled by alternate training and testing without the possible detrimental effects of the originally proposed test. The above conclusions are supported by the Station Blackout Report submitted to the NRC by MP&L April 3, 1986.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated since it will not result in hardware or operating procedure changes.
3. There is no significant reduction in margin of safety since the intent of performing alternate testing is to avoid degradation of plant equipment. As shown in the above referenced Station Blackout report the training goals are being met through alternate testing. The Station Blackout Report itself provided additional analytical information on plant performance under SBO conditions.

Therefore, deleting the requirement to conduct a special simulated loss of onsite alternating-current power test and instead demonstrating the adverse impact of such a test and implementing the BWR Owners' recommendations for compliance with I.G.1 does not involve a significant hazards consideration.