



OLIVER D. KINGSLEY JR.
Vice President
Nuclear Operations

August 3, 1988

U. S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D. C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Revised Proposed Amendment to the
Operating License (PCOL-87/14)
AECM-88/0146

References: (1) MAEC-88/0043, February 29, 1988; NRC Request for Additional Information
(2) AECM-87/0246, December 16, 1987; Proposed Amendment to the Operating License (PCOL-87/14)

As requested in Reference (1), System Energy Resources, Inc. (SERI) is submitting by this letter a revision to the proposed amendment PCOL-87/14 originally submitted in Reference (2). The proposed amendment PCOL-87/14 addresses implementation of the revised 10CFR55 rule. The revision is based on conversations held with the NRC on March 8, 11, and 16 and June 15, 1988.

In accordance with the provisions of 10 CFR 50.4, the original of the revised proposed amendment is enclosed and the appropriate copies will be distributed. This revision has been reviewed and accepted by the Plant Safety Review Committee. The Safety Review Committee reviewed the technical content and approved the proposed amendment at the time of the original submittal.

Based on the guidelines presented in 10 CFR 50.92, SERI has concluded that this proposed amendment involves no significant hazards considerations.

An application fee has not been enclosed in this submittal because it was previously included in Reference (2).

Yours truly,

8808.50232 880803
PDR WADOCK 05000416
P PNU

ODK:slg
Attachments: 1. Affirmation per 10 CFR 50.30
2. Revised Proposed Amendment PCOL-87/14

cc: (See Next Page)

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Handwritten initials: Aool

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)
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State Board of Health
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BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

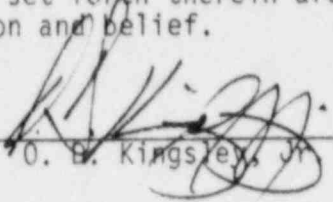
LICENSE NO. NPF-29

DOCKET NO. 50-416

IN THE MATTER OF
MISSISSIPPI POWER & LIGHT COMPANY
and
SYSTEM ENERGY RESOURCES, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

I, O. D. Kingsley, Jr., being duly sworn, state that I am Vice President, Nuclear Operations of System Energy Resources, Inc.; that on behalf of System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by System Energy Resources, Inc. 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 System Energy Resources, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

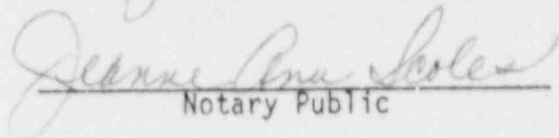


O. D. Kingsley, Jr.

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 3rd day of August, 1988.

(SEAL)



Notary Public

My commission expires:

My Commission Expires Sept. 21, 1991

A. SUBJECT

1. PS-87/04 Deletion of Training Commitments
2. Affected Documents:
 - (a) Operating License (OL) Condition 2.C.(30), Training Instructors, page 10
 - (b) Technical Specification (TS) 6.3, Unit Staff Qualifications, Page 6-6
 - (c) Technical Specification 6.4, Training, Page 6-6

B. DISCUSSION

The changes proposed below incorporate the revision to 10CFR55 which became effective May 26, 1987.

1. OL Condition 2.C.(30) states, "Permanent training center instructors and consultants assigned to training who, after initial criticality will teach systems, integrated responses, transients, and simulator courses to license candidates or NRC-licensed personnel, shall either demonstrate or have previously demonstrated their competence to the NRC staff by successful completion of a senior operator examination prior to teaching licensed operators."

SERI proposes to delete this condition, since the Grand Gulf Nuclear Station (GGNS) operator training program is now INPO accredited and based on a systems approach to training.

2. TS 6.3 states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter# to all licensees, except for the Chemistry/Radiation Control Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975##; the Shift Technical Advisor who shall meet or exceed the qualifications referred to in Section 2.2.1.b of Enclosure I of the October 30, 1979 NRC letter to all operating nuclear power plants..."

SERI proposes to delete the phrase "and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees except for the Chemistry/Radiation Control Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975##; the Shift Technical Advisor who shall meet or exceed the qualifications referred to in Section 2.2.1.b of Enclosure I of the October 30, 1979 NRC letter to all operating nuclear power plants" from the above TS and replace it with, "except for the Chemistry/Radiation Control Superintendent

and Shift Technical Advisor, who shall meet or exceed the education and experience requirements of ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, 1987, and licensed personnel who shall meet or exceed the criteria of the accredited license training program;". Deletion of this phrase will make GGNS TS consistent with the revision to 10CFR55 and Regulatory Guide 1.8, Revision 2, 1987.

3. Footnote # to TS 6.3 and 6.4 states, "Except that the experience and other training information provided in the licensee's letter to the NRC dated July 29, 1985 are acceptable for the individuals listed in that letter." Footnote ## to TS 6.3 states, "Except that the individual identified in MP&L's letter to the NRC dated December 11, 1985 is considered qualified to hold the position of Chemistry/Radiation Control Superintendent based on the experience, education, and other information provided or referenced in that letter."

SERI proposes to delete these footnotes. Footnote # modified Section A of Enclosure 1 of the March 28, 1980 NRC letter which SERI proposes deleting under B.2 and B.4 of this discussion. The individual identified in the referenced MP&L letter in Footnote ## complies with the requirements of Regulatory Guide 1.8, Revision 2, 1987.

4. TS 6.4 states, "A retraining and replacement training program for the unit staff...shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter # to all licensees,..."

SERI proposes to 1) delete the phrase "the requirements and recommendations of Section 5.5 of ANSI N18.1-1971" and replace it with "INPO accreditation criteria" 2) delete the reference to "Appendix A" since the revision to 10CFR55 deleted this appendix, and 3) delete the phrase "and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter # to all licensees" to make GGNS TS consistent with the revision to 10CFR55, which superseded the referenced letter.

C. JUSTIFICATION

These proposed changes result from the NRC revision to 10CFR55 in which the rule was completely rewritten and from NRC guidance on the implementation of the revised 10CFR55 as provided by Generic Letter (GL) No. 87-07 and subsequent public meetings. GL 87-07 states in the Introduction, "The Commission has become increasingly aware of the need to update its operator licensing regulations and related regulatory guides. These revisions are needed to...reflect upgraded requirements for licensed operator selection, training, and requalification programs resulting from the accident at TMI-2."

The proposed changes to the OL and TS result in no change in facility operations or license operator training programs and clearly are in keeping with NRC regulations.

Specifically:

1. The revision to 10CFR55 abolished categories of two previously permitted licenses under 10CFR55.30, namely "special senior operator licenses" and "instructor certification" at industry accredited facilities. GL 87-07, in explaining the changes made to the rule, stated "The Commission has deleted the provision for issuance of special senior operator licenses from the final rule. This action is in recognition of the industry accreditation of training programs ...and is in keeping with the intent of the Commission Policy Statement on Training and Qualifications of Nuclear Power Plant Personnel...since industry accreditation includes instructor evaluation, current NRC instructor certification will not continue at facilities with industry accreditation." This is consistent with the position taken in NUREG-0737 I.A.2.3, "Administration of Training Programs", that the requirements for instructors to have senior reactor operator license qualifications were to be interim until accreditation of training institutions. The GGNS training program is industry accredited and based on a systems approach to training, having become a full member in the National Academy for Nuclear Training in April 1987.
2. Enclosure 1, Section A of the March 28, 1980 NRC letter addressed eligibility requirements for license candidates to be administered license examinations. Enclosure 1, Section C of the March 28, 1980 NRC letter addressed requalification training programs. License candidates are not part of the Unit Staff discussed in TS 6.3. These individuals by definition must be licensed. Therefore Section A eligibility requirements for license candidates are not applicable to this TS. Similarly, the requalification program discussed in Section C is not applicable to minimum qualifications for Unit Staff, since requalification is already a part of the requirement for being a licensed operator. Further, SERI considers the revision to 10CFR55 supersedes in their entirety Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter based upon statements made by NRC representatives at the April 9, 1987 public meeting to discuss the changes presented by GL 87-07. Regulatory Guide 1.8, Revision 2, 1987, which was issued in conjunction with the revision to 10CFR55, continues to endorse ANSI/ANS 18.1-1971 except for certain positions in ANSI/ANS 3.1-1981. The proposed changes make GGNS TS consistent with the latest revision of the Regulatory Guide.
3. Footnote # modified the reference to Section A of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. With the deletion of that reference as discussed above, the footnote is no longer necessary. The individual referenced by footnote ## complies with Regulatory Guide 1.8, Revision 2, 1987. Therefore, this footnote is no longer necessary.
4. Regulatory Guide 1.8, Revision 2, 1987, which was issued in conjunction with the revision to 10CFR55, continues to endorse ANSI/ANS 18.1-1971 except for certain positions in ANSI/ANS 3.1-1981. However, SERI also recognizes that the training outlined in Section 5.5 of ANSI 18.1-1871 is both outdated and minimal at best. The proposed changes make GGNS TS consistent with the revised 10CFR55 and also

reflect SEKI's accredited status and commitment to current industry standards for performance-based training. The revision to 10CFR55 incorporated into the body of the rule those requirements previously contained in 10CFR55 Appendix A. Since Appendix A no longer exists SERI considers retention of a reference to it in TS is inappropriate. SERI also considers the revision to 10CFR55 supersedes in their entirety Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter as referenced in TS 6.4. SERI's basis for this opinion is statements to that effect which were made by NRC representatives at the April 9, 1987 public meeting to discuss GL 87-07 and the statement on page 6 of GL 87-07 which states, "Those facility licensees that have made a commitment different from or more than that required by these new rules for license amendments and technical specifications changes, may apply to the Commission so that they can conform to these new rules."

D. SIGNIFICANT HAZARDS CONSIDERATION

These changes are proposed in response to the NRC revision to 10CFR55 and Regulatory Guide 1.8, Revision 2, 1987. GL 87-07 indicated the revisions "were to improve the operator licensing process and to achieve the following objectives: (1) Improve the safety of nuclear power plant operations by improving the operator licensing process and examination content..."

SERI has evaluated the proposed changes to the OL and TS and determined the proposed changes are administrative in nature and do not involve a significant hazards consideration for the following reasons:

- (1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because they involve only an incorporation of changes from 10CFR55 and Regulatory Guide 1.8, Revision 2, 1987. The revision to 10CFR55 endorses an accredited training program such as the one at GGNS. NUREG-1262 indicates "the NRC has placed great importance in the INPO accreditation process," concluding that INPO's criteria are equivalent to NRC's. INPO accreditation signifies SERI's achievement of and commitment to the highest industry standards. Because of the administrative nature of the proposed changes the probability or consequence of an accident are not affected.
- (2) The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because the proposed changes will have no effect on plant configuration, setpoints or operating parameters. Since the intent of the NRC revision was stated as being to improve the safety of nuclear power plant operations, the proposed changes to comply with the revised rule will not adversely affect operator interface with plant equipment.
- (3) The proposed changes do not involve a significant reduction in the margin of safety because the revision to 10CFR55 superseded the NRC letter commitments referenced in the TS and endorsed nuclear industry accreditation of training programs such as SERI's INPO accredited license operator training program. This endorsement reflects the importance the NRC has placed in the INPO accreditation process. Also, Regulatory Guide 1.8, Revision 2, 1987 superseded the commitments referenced in the TS which it is replacing. The proposed changes are administrative in nature and clearly have no effect on the margin of safety.