



MISSISSIPPI POWER & LIGHT COMPANY

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October 4, 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 & 2
Docket Nos. 50-416 and 50-417
License No. NPF-29
Permit No. CPPR-119
Supplemental Information on
Proposed Amendment to Operating
License and Construction Permit
AECM-86/0314

On September 2, 1986, Mississippi Power & Light Company (MP&L) submitted proposed amendments to Operating License NPF-29 and Construction Permit CPPR-119 for Units 1 and 2 of the Grand Gulf Nuclear Station (GGNS). These amendments proposed to change the licensee responsible for operating Unit 1 and constructing Unit 2 from MP&L to System Energy Resources, Inc. (SERI).

On October 2, 1986, MP&L representatives met with members of your staff to discuss several questions which were identified during their review. Attachment 1 lists and provides responses to those questions. In addition, a more detailed discussion of significant hazards considerations was previously requested. This is provided in Attachment 2.

If there are further questions, please notify me.

Yours truly,

ODK:bms
Attachments

cc: (See Next Page)

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RESPONSES
TO
SERI LICENSE AMENDMENT
QUESTIONS
IDENTIFIED DURING
OCTOBER 2, 1986 MEETING

QUESTION 1: Discuss any changes expected to be required of FSAR Section 13 to effect the transfer from MP&L to SERI.

RESPONSE: It is proposed to amend the GGNS operating license and construction permit to allow SERI to become the constructor and operator of GGNS. The present constructor and operator of GGNS is MP&L acting as agent for SERI. As a part of the transfer of responsibility, the MP&L Nuclear Production Department (NPD) will move with no significant changes to SERI.

The plant, modification and construction, quality assurance, nuclear plant engineering, nuclear licensing and safety, and radiological and environmental organizations will be transferred with no changes in organization, reporting relationships, responsibilities or personnel assignments.

The only change within NPD that is planned involves two or three people in the Nuclear Support section who currently handle a portion of NPD budgeting will move to the SERI department which will handle budgeting for all of SERI. These personnel are not currently shown on any licensing document affected by this change.

The NPD currently handles all operation, maintenance, engineering, modification, licensing, fuel management, project management, quality assurance, construction, on-site security, nuclear related training, and other technical aspects of construction and operation of GGNS with NPD personnel or with contracted services managed by NPD personnel. Minimal technical support is provided by the non-nuclear portion of MP&L. The technical support provided by the non-nuclear portion of MP&L consists of calibration of the power use meters (not safety related) in the control room and those activities associated with transmission of electrical power described in the response to Question 2.

Areas of support which are provided by the non-nuclear portion of MP&L include public relations, legal, accounting, budgeting, purchasing, contract administration, payroll, employment, non-nuclear training, selected offsite security matters, and some emergency response support. These areas will be handled following the change by SERI personnel. Most of these services will be handled by two new departments responsible for financial, accounting, personnel, and administrative areas.

The new organization responsible for these areas has been defined and staffing plans have been made. More than half of the positions will be filled by transfer of non-nuclear MP&L personnel who are currently responsible for these areas on GGNS. These functions become effective immediately upon approval of the proposed license amendment or will continue to be supported by MP&L for a limited interim period; for example, the emergency planning transition plan is discussed in the response to Question 3. No changes are planned with regard to compliance with commitments and requirements in these areas.

There are numerous references throughout the FSAR to MP&L as the operator of GGNS. However, the principal sections that address Middle South Energy, Inc. (MSE, now SERI) as an owner and MP&L as the operator occur in Sections 1.1.2, 1.4.1 and 13.1.1. These sections will require revision to reflect MSE's name change to SERI and its assumption of operations responsibility for GGNS.

FSAR Section 13.1.1.2 Organizational Arrangements will require revision to provide a description of SERI instead of MP&L, which is currently described. Since the MP&L Nuclear Production Department is being transferred essentially intact, the principal sections requiring revision will be the introductory paragraph to Section 13.1.1.2.1 and Sections 13.1.1.2.1.1 and 13.1.1.2.1.2.

Other portions of Chapter 13 that will require some degree of revision include Figures 13.1-1 and 13.1-1a and appropriate portions of Appendix 13A.

Documents included in the FSAR by reference that will require revision include the Emergency Plan (Section 13.3), Security Plan (Section 13.6) and the Operational Quality Assurance Manual (Section 17.2). These documents will be revised in accordance with appropriate regulations to reflect name changes and organizational changes, but no substantive changes are planned in the manner of complying with their associated commitments and requirements as a result of the proposed license amendment.

QUESTION 2: Discuss the provisions to be taken by the licensee and the features of the offsite/onsite power supply systems which will ensure that the requirements of GDC-17 will continue to be met.

RESPONSE: The design of the GGNS offsite power system is described in the FSAR and the SER and meets the requirements of GDC-17. Since the proposed license amendment has no affect on the design of the offsite power system or its operation and maintenance, the present compliance with GDC-17 is not changed.

SERI (formerly MSE) contracted separately with MP&L when GGNS was planned to provide power to GGNS. This contract is a part of the basis for compliance with GDC-17 and is independent of the arrangements under which SERI contracted with MP&L to act as its agent in building and operating the facility.

The proposed license amendment provides for SERI to become the constructor and operator of GGNS. No change in ownership, operation, maintenance, or coordination of activities affecting offsite power supply is planned.

Ownership of offsite power supply equipment is depicted on the marked up copy of drawing ME-G2 Grand Gulf Nuclear Station 500 KV Switchyard which was provided during the October 2, 1986 meeting. Note that this ownership demarcation depicts existing arrangements already in effect between SERI (formerly MSE) and MP&L. As shown by the drawing, change in ownership occurs at the transformer bushings on the high voltage side of the two 500/34.5 KV transformers. Both 34.5KV substations and associated BOP and ESF transformers are owned by SERI. The 115KV/4.16KV ESF transformer, plus the underground cable and feeder breaker from the 115KV substation, are owned by SERI. The 115KV substation itself is owned by MP&L. The main unit output lines, through their main transformers (20.9/500KV) are owned by SERI. The 500KV lines downstream of these transformers are owned by MP&L as is the 500KV switchyard.

Equipment owned by MP&L and SERI equipment located in the switchyard will be maintained by MP&L with certain exceptions. SERI will maintain ESF transformer No. 12 and the main transformers (which are located in the switchyard), but, as has been the case in the past, major maintenance arrangements for the main transformers will be reviewed and those activities will be observed by representatives of organizations which will remain within MP&L and who will provide technical advice as appropriate.

No planned change to the availability of the offsite power system as described in the GGNS FSAR, including breaker manipulation, transformer outage, or feeder line deenergization, will be made by MP&L without specific verbal permission of the on shift Shift Superintendent.

Design changes in those parts of the GGNS switchyard and associated transmission facilities which are not owned or operated by the licensees are currently reviewed and approved by the MP&L Nuclear Production Department (NPD) prior to implementation. This review and approval is used to assure that commitments and requirements (including GDC-17) are satisfied and that prior NRC approval is obtained if needed. Following the proposed change, the NPD will become part of SERI. The current arrangements for design change review and approval prior to implementation will not be changed except that SERI will assume this responsibility instead of the NPD.

There will be a written agreement between MP&L and SERI under which MP&L and SERI will continue current arrangements for operation, maintenance and coordination of the switchyard and associated transmission facilities. This agreement will also contain provisions to assure that MP&L obtains SERI design change approval of the switchyard and associated transmission facilities prior to implementation. MP&L and SERI will maintain written guidance and procedures covering these items.

QUESTION 3: Discuss the actions to be taken by the licensee and all other involved organizations which will ensure that the requirements of 10 CFR 50.47, Emergency Plans, will continue to be met.

RESPONSE: Mississippi Power & Light Company (MP&L) maintains an Emergency Preparedness (EP) program for the Grand Gulf Nuclear Station (GGNS) that meets the requirements of applicable Federal regulations and guidance. This program includes numerous internal and external interfaces and working agreements that have been established for comprehensive emergency response support in the event of an emergency declaration at GGNS.

The establishment of System Energy Resources, Inc. (SERI) as the NRC licensee and operator of GGNS must be implemented such that these interfaces are smoothly and efficiently transferred to SERI with no resultant degradation of the effectiveness of the emergency preparedness program for GGNS. MP&L has reviewed and evaluated the effect of SERI's formation on these interfaces and has established a transition plan which will ensure compliance with applicable Federal regulations and guidance during the transition period.

External Interfaces

10 CFR Part 50.47 and Appendix E require that as a part of emergency response planning, the offsite organizations capable of providing support to the emergency response effort be identified and arrangements be in place for requesting and securing their assistance during emergency conditions.

MP&L has in place approximately twenty-three (23) written agreements and commitment letters with Federal, state and local government agencies, hospitals, institutions, utility groups, commercial companies and consultants which establish and define the support to be provided by these organizations in the event of an emergency declaration at GGNS. Some of these documents are executed in MP&L's name for support to GGNS and others are executed by MP&L, as agent for the owners of GGNS.

These documents have been reviewed to determine their validity and the need for any modifications taking into account the establishment of SERI as the operator of GGNS.

- i. For those documents which were executed by MP&L as agent for the owners of GGNS, no action is necessary except to notify the signatory organizations that MP&L will no longer be acting in the agency capacity, and that future dealings will be with SERI, acting for itself.

2. Those documents that were executed in MP&L's name without the agency disclosure were done so on the basis that MP&L was the operator of GGNS. MP&L intends to assign these agreements and commitments to SERI and notify the signatory organizations that such assignment is being undertaken due to the transition from MP&L to SERI.

MP&L believes this portion of the transition is an administrative change and will ensure that the signatory organization representatives realize that they will be interfacing with the same people with whom they currently interface. Good relationships exist between MP&L's staff and the offsite agency representatives and no difficulties are expected in implementing this transition.

The above described actions are expected to be complete by November 15, 1986 and will ensure continuity of offsite support coverage, thus meeting the requirements of 10 CFR 50.47 and Appendix E.

Internal Interfaces

The Nuclear Production Department (NPD) within MP&L is responsible for GGNS emergency preparedness planning and response. However, significant resources are provided by non-NPD departments in support of this effort. In order for SERI to assume responsibility for emergency preparedness planning and response, the transition plan has been developed to address how and when SERI will assume responsibility for the EP resources currently provided by MP&L non-NPD departments.

A list has been compiled of the non-NPD facilities, equipment and people currently committed to the EP effort. The physical facilities include the Corporate Emergency Center (CEC) and other offices associated with its operation, located in MP&L's corporate headquarters building, and the Backup Emergency Operations Facility (BEOF), located at one of MP&L's fossil generating plants. Equipment includes the MP&L helicopter, radio communication channels and miscellaneous office and telecommunications equipment. Additionally, approximately seventy (70) MP&L employees from non-NPD departments have been identified (by name) who participate in the program as corporate level respondents.

MP&L and SERI have carefully reviewed and evaluated these resource needs and have agreed on a transition plan which provides for SERI assuming responsibility to furnish these services from its own resources in a step-wise process as it can reasonably be expected to do so. In the interim, MP&L will continue to provide support to the GGNS EP program using its currently committed resources under the terms of a written agreement with SERI.

The major transition activities and milestones are summarized below:

1. December 31, 1986 - GGNS to Jackson radio communications as a backup to telephone systems
2. June 30, 1987 - Personnel for management and operations of the CEC and its associated functions including Rumor Control and Message Center

Facilities and equipment for the Rumor Control and Message Center
3. September 30, 1987 - Personnel and equipment for the Emergency News Media Center. New facilities for this center are to be constructed and will be provided by Claiborne County under a written agreement with SERI.
4. March 31, 1988 - Paging of corporate personnel from new SERI corporate office
5. April 30, 1988 - CEC facilities and equipment located at new SERI corporate office
6. Permanent Use of - MP&L Resources MP&L helicopter will be available at all times to SERI on a first priority basis for scheduled exercises and any actual emergencies.

The BEOF will be available on a first priority basis in the event it is needed.

The scheduling of transition milestones has been developed in such a way as to allow SERI sufficient time to develop its capabilities to support these activities. Additionally, enough time has been allowed for staffing, identification, training and special drills for SERI personnel who will be assuming new duties and responsibilities in the emergency organization. Prior to the April 30, 1988 milestone, a series of full-scale drills will be conducted to ensure personnel familiarity with and integrated operability of the new CEC and associated communications facilities.

At each major transition milestone, SERI will review the GGNS Emergency Plan and determine the need for its revision. Revisions necessary to reflect changes in emergency plan implementing procedures or other substantive modifications will be submitted to NRC within 30 days. Minor or purely administrative changes will be included in the annual revision to the Emergency Plan.

Summary

MP&L and SERI recognize the complexity of this emergency preparedness transition and the importance of ensuring that the program continues to meet the requirements of 10 CFR 50.47 and Appendix E. The transition plan has been developed carefully and taking into account the interfaces that must be coordinated and preserved. Both companies believe that the transition plan they are implementing will result in a coordinated and effective transition that will maintain the effectiveness of the GGNS Emergency Preparedness Program.

QUESTION 4: Discuss the results of the licensee's overall review to ensure that all regulatory issues relevant to the requested action have been identified and appropriately dealt with.

RESPONSE: During the preparation of the request for a license amendment, a review of the license and relevant portions of Title 10, Code of Federal Regulations (10CFR) was performed by both licensing and legal staff personnel. In addition, the preparers of the license amendment request used as guidance a previous submittal to the NRC made by another utility whose request was similar. These actions and comparisons served as the basis for concluding that the request for license amendment addressed the areas pertinent to the issue required by Title 10 of the Code of Federal Regulations.

In response to verbal suggestions made by the NRC, an additional systematic section-by-section review of 10CFR has been performed to assure the completeness of the license amendment request submittal. In actuality, two independent reviews have been performed, one by technical licensing personnel and the other by legal staff. Both of those reviews have concluded that the license amendment request is complete and satisfies the requirements specified in 10CFR for this type of application.

It is clear that 10CFR addresses itself to many facets of licensed plant operation for which SERI will assume responsibility. Specific areas include plant security, emergency planning, financial protection requirements, record keeping and posting requirements, reporting and quality assurance. The responsibilities in these areas borne by MP&L will be assumed in an identical manner by SERI. As such, no change in these basic requirements were identified in the licensing amendment.

As discussed in the response to Question 1, changes will be required to the Emergency Plan, Security Plan, and the Quality Assurance Manuals to incorporate name and organizational changes. These changes are being handled in compliance with the specific regulatory requirements applicable to these areas. The changes involved have no significant effect on the manner of compliance with commitments and requirements.

SUPPLEMENTAL
INFORMATION
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THE DISCUSSION OF
SIGNIFICANT HAZARDS CONSIDERATIONS
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The following discussion provides a more specific discussion of the three significant hazards considerations standards delineated in 10CFR50.92:

- 1) Operation of the facility in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The design of the facility, its licensing bases, and the personnel who operate and manage the facility are not being changed in any manner by the proposed license amendment. Facility operating license conditions, technical specification limits and licensing commitments are similarly unaffected. The existing plant operating and emergency procedures will continue to be utilized and the operator training program will proceed without change. For these reasons it is concluded that the proposed license amendment will not create an increase in the probability or consequences of an accident. In fact, due to the opportunity for increased management focus on GGNS operations afforded by this proposed license amendment, it is believed that its incorporation will actually decrease the probability of an accident.
- 2) Operation of the facility in accordance with the proposed amendment will not create the possibility of a new or different type of accident from any accident previously evaluated. The design and design basis of the plant remains the same. In that regard, Chapter 15 of the GGNS remains complete and accurate in addressing the licensing basis events and analyzing plant response and consequences. The allowable conditions of operations of GGNS, as specified by the Operating License and Technical Specifications are unchanged. The plant operating and emergency procedures are also unaffected. As such, the initial plant conditions for which design basis accident analyses have been based are still valid. It is therefore concluded that new or different types of accidents from those previously analyzed are not introduced by the proposed license amendment since there are no design or operation changes which could create a new design basis accident nor are there any changes to allowable plant operating conditions created which were not considered in the existing Chapter 15 of the GGNS FSAR.
- 3) Operation of the facility in accordance with the proposed amendment will not involve a significant reduction in a margin of safety. Plant safety margins are established through Limiting Conditions For Operations, Safety Limits, and Limiting Safety System Settings specified in the GGNS Technical Specifications. These prescribed minimum operating criteria serve as the input basis to the plant safety analyses which establishes plant safety margins for design basis events. The only changes to the plant Technical Specifications which will result from the proposed license amendment are a

change to the title of the position of president shown on the Offsite Organization figure (6.2.1-1) and the substitution of SERI for MP&L in the discussion of SRC composition in Section 6.5.2.2.

Neither of these changes affect Limiting Conditions For Operations, Safety Limits, or Limiting Safety System Settings. Since there will be no technical changes to the plant Technical Specification as a result of the proposed license amendment that will impact the plant design basis and safety analysis, and since no plant design changes are proposed in conjunction with the amendment request, it is concluded that the proposed license amendment will have no affect of any plant margin of safety.