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November 17, 1986
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O. D. KINGSLEY, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

Attention: Dr. J. Nelson Grace, Regional Administrator

Dear Dr. Grace:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Raychem Shrinkable Tubing
AECM-86/0355

This letter is provided to document activities conducted during the current refueling outage at Grand Gulf Nuclear Station (GGNS) regarding the application of Raychem shrinkable tubing on electrical splices. These activities involved field walkdown inspections and the rework of certain splices based on conservative acceptance criteria. The following information is provided to update the NRC staff on this matter and actions taken by MP&L at GGNS.

A. BACKGROUND

Early in the current refueling outage, selected splices were inspected for deficiencies recently identified in the industry. This inspection was in part due to NRC IE Notice 86-53 (June 26, 1986) and in part as a result of an MP&L initiated equipment qualification (EQ) field inspection program scheduled for this refueling outage. Based on the findings of this sample inspection, MP&L elected to perform a 100% walkdown inspection of splices requiring sealing according to the GGNS EQ program documentation.

B. WALKDOWN/INSPECTION FINDINGS

1. To establish a listing of splices to be inspected, the GGNS EQ program was used to identify those splice locations which require sealing. Based on the program, approximately 315 splice locations were identified, representing a complete listing of splices at GGNS requiring sealing.

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2. MP&L personnel attended a regional workshop on Raychem tubing and related industry problems in late September 1986. Based on information received at that seminar, the GGNS walkdown personnel were trained as to key parameters to be reviewed during splice inspections. The acceptance criteria utilized in the inspections was based on Raychem test reports and industry testing available at that time. For this reason, the acceptance criteria is considered conservative in that limited flexibility was allowed in tubing overlap and usage range.
3. The walkdowns were completed and resulted in the identification of approximately 60 splice locations which failed to meet the GGNS conservative acceptance criteria. The discrepancies identified generally dealt with the degree of tubing overlap (with insulation) and improper selection of splice tubing diameter.

C. CORRECTIVE ACTIONS

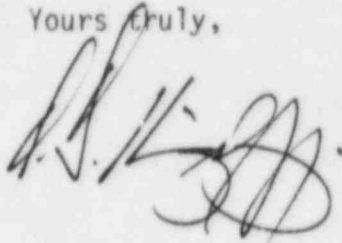
1. While additional industry testing data will soon be available, MP&L elected to rework the approximately 60 splice locations identified to be suspect in the walkdown. Rework of these splices is currently in progress and will be completed during the current outage. The rework essentially replaces the current tubing with an application which meets or exceeds the Raychem acceptance criteria. Personnel on the rework teams received training regarding proper tubing installation similar to that provided to walkdown personnel.
2. Prior to this outage, the GGNS installation standard associated with shrinkable tubing was revised to clarify proper tubing application criteria.

D. REPORTABILITY

1. Even though certain splice locations were reworked, walkdown inspection records have retained sufficient information to evaluate the as-found condition. MP&L is currently working with an industry group on equipment qualification to obtain the latest testing information for various Raychem tubing configurations. A reportability determination on the as-found condition will be made based on the latest testing information. Based on preliminary results regarding this testing, it is believed that the tubing discrepancies identified at GGNS would not have adversely impacted the required post-accident operation of the equipment associated with the subject splices.
2. Since the final reportability determination is dependent on the completion of certain industry tests, only an approximate schedule for this determination can be provided at this time. Based on current schedules, we anticipate the completion of our reportability determination by December 15, 1986.

Overall, we believe that the necessary, prudent steps have been taken at GGNS to address this industry concern and to permit resumption of critical operations at the conclusion of the refueling outage. Please advise this office, if you require additional information in this matter.

Yours Truly,



ODK:rg

cc: Mr. T. H. Cioninger
Mr. R. B. McGehee
Mr. N. S. Reynolds
Mr. H. L. Thomas
Mr. R. C. Butcher

Mr. James M. Taylor, Director
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