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Director
Nuclear Licensing

April 14, 1989

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
Report No. 50-416/89-04 dated
March 16, 1989 (MAEC-89/0085)
AECM-89/0078

System Energy Resources, Inc. hereby submits response to violation
50-416/89-04-05.

Yours truly,

JGC:bms
Attachment

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Notice of Violation 89-04-05

10CFR50.59 states that the licensee may make changes in the facility and procedures as described in the FSAR unless the changes involve an unreviewed safety question. The licensee shall maintain records of changes in the facility made pursuant to 10CFR50.59 and these records must include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, the licensee failed to initially perform a written safety evaluation prior to the storage of Ecodex resin in containment. An 'after the fact' evaluation determined that Ecodex storage presents a potential seismic hazard to small diameter lube oil tubing required for continued operations of one of two drywell purge compressors. The drywell purge system is a sub-system of the Combustible Gas Control System and Engineered Safety Features System.

I. Admission Or Denial Of The Alleged Violation

System Energy Resources, Inc. (SERI) admits to this violation.

II. The Reason For The Violation, If Admitted

SERI failed to initiate a written 10CFR50.59 Safety Evaluation for storage of Ecodex inside containment due to Plant Staff's failure to recognize the safety significance involved. It was understood as standard practice that unused boxes of Ecodex would be stored in designated areas inside the Containment until they were consumed.

Ecodex is a powdered resin used in the Reactor Water Cleanup System (and other plant systems) to remove impurities, corrosion and iron products. Due to certain properties, i.e., ion exchange, fiber contents, etc., it acts as a "mechanical filter" during precoat activities. This resin has been used for the RWCU filter demineralizers since initial plant startup.

III. The Corrective Steps Which Have Been Taken And The Results Achieved

Immediate Actions

1. The Ecodex that was stored inside containment has been removed. System Operating Instruction (SOI) 04-1-01-G33-1 was changed to require removal of Ecodex resin and containers after each precoat activity.
2. Plant personnel performed a walkdown of the Containment Building to determine if similar storage conditions exist, i.e., items/materials unauthorized for permanent storage.

Results indicated that the Standby Liquid Control (SLC) Drain Collective Storage Area contained 55 gallon drums. Although plant piping layout drawings reflect the location of these drums in this area, they were removed until an engineering evaluation can be performed to determine possible safety implications.

3. A memo was sent to all plant personnel informing them of the nature of this event. Appropriate guidance was provided to individuals regarding permanent storage of materials (such as Ecodex) in safety related areas.

Long Term Actions

1. SERI will take appropriate actions to ensure conformance to design consideration requirements prior to storing Ecodex inside containment on a permanent basis.
2. As previously committed, SERI plans to take several actions with regard to the 10CFR50.59 screening process and training program. Such actions include an additional screening review to be performed by a qualified person; procedures governing screening will be reviewed and approved by PSRC and SRC; and periodic audits of screening effectiveness will be conducted. Audit results will be reported to PSRC and SRC for review.

IV. The Corrective Steps Which Will Be Taken To Preclude Further Violation

SERI considers the actions taken in Section III adequate to preclude further violation of this nature.

V. Date When Full Compliance Will Be Achieved

The engineering evaluation discussed in Section III.2 will be requested by June 30, 1989. Any additional corrective actions required as a result of this evaluation will be completed by August 31, 1989.