



JOHN G. CESARE, JR.
Director
Nuclear Licensing

May 23, 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. 50-416/89-07 dated
April 12, 1989 (MAEC-89/0127)
AECM-89/0100

On April 17, 1989 System Energy Resources, Inc. (SERI) received NRC Inspection Report No. 50-416/89-07 dated April 12, 1989. This inspection report requested SERI to provide a schedule to correct the nomenclature discrepancies between procedures and installed equipment as discussed in NRC Inspection Report Nos. 50-416/89-04 and 50-416/89-07. Also, SERI was requested to provide a justification for operation until this problem is corrected.

Attached is SERI's response to NRC Inspection Report No. 50-416/89-07. If you have any questions, please advise.

Yours truly,

JGC:jjb
Attachment

cc: (See next page)

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P. O. BOX 23070 | JACKSON, MISSISSIPPI 39225-3070 | (601) 944-9210
A Middle South Utilities Company

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cc: Mr. W. T. Cottle (w/a)
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. H. O. Christensen (w/a)

Mr. Stewart D. Ebnetter (w/a)
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

Mr. L. L. Kintner, Project Manager (w/a)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 14B20
Washington, D.C. 20555

I. Discussion

The two types of labeling used at GGNS are:

A. Plant Control Panel Labeling

This type labeling pertains to panels throughout the plant, e.g., handswitches, recorders, indicators, etc. These labels are defined on controlled plant design drawings. Plant "Control Room" panel labels require approval by Nuclear Plant Engineering (NPE) in accordance with Engineering Standard Number 17 (ES-17). An Engineering Evaluation Request (EER) must be developed, including a proposed markup of the affected drawing, prior to label modifications. ES-17 applies to "Control Room" panels only, i.e., all 1H13 panels, 1H22-P150, 1H22-P151, and alternate shutdown control and transfer panels 1H22-P152, 1H22-P295, 1H22-P296, 1H22-P298, and 1H22-P299. For other local control panels, (e.g., Motor Control Centers, Load Control Centers, and switchgear) the System Operating Instruction will be used to determine label nomenclature.

B. Plant Component Labeling

This type of labeling is for gauges on instrument racks, valves, doors, and other various components. These labels are not defined on controlled plant design drawings.

II. Administrative Controls

The Operations Department is assigned overall responsibility for the plant labeling program with assistance from NPE as required.

A. Plant Administrative Procedure 01-S-06-43, "Component Identification and Labeling" instructs plant personnel on the correct labeling process. All labeling activities are performed in accordance with the instructions delineated by this procedure. This procedure provides the methodology for specifying, manufacturing, and installing labels in the plant in accordance with ES-17 for "Control Room" panels as described above.

B. System Operating Instructions (and other plant procedures) will be used in determining the correct label nomenclature for other local control panels and components. All labels and label modifications will correspond to the noun descriptions specified by these instructions.

III. Labeling Schedule

SERI has developed an implementation schedule to eliminate labeling deficiencies.

<u>SERI Action</u>	<u>Completion Date</u>
A verification walkdown of existing plant labels versus the applicable System Operating Instructions (and other appropriate plant documentation) will begin by June 1, 1989, with priority given to ESF Systems.	
This verification will be performed, with required labeling changes completed in the following order:	
o Plant Breakers	September 30, 1989
o Control Room/Plant Panels	November 30, 1989
o Plant Valves (accessible)	November 30, 1989
o Plant Valves (inaccessible, e.g., Drywell, Condenser Bay, etc.)	During RF04

IV. Justification for Operation

The discrepancies identified by the Resident Inspectors in Inspection Report Nos. 50-416/89-04 and 50-416/89-07 are currently being corrected. Based on a review of the identified labeling discrepancies and on the fact that the discrepancies have not resulted in any significant plant operating problems, it is the consensus of plant management that the labeling concerns do not represent an adverse safety condition for plant operations.

Further, the proposed programmatic controls should preclude future occurrences of this nature.