

**SYSTEM ENERGY
RESOURCES, INC.**

A Middle South Utilities Company

WILLIAM T. COTLE
Vice President
Nuclear Operations

July 27, 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
Response to Request for Additional
Information Related to Generic
Letter 87-09
Proposed Amendment to the Operating
License (PCOL-88/03)
AECM-89/0128

- References:
- 1) System Energy Resources, Inc. Letter (AECM-88/0064) dated August 19, 1988
 - 2) NRC Letter dated October 6, 1988 (MAEC-88/0302)
 - 3) System Energy Resources, Inc. Letter (AECM-88/0218) dated November 9, 1988
 - 4) NRC Letter dated November 25, 1988 (MAEC-88/0357)
 - 5) System Energy Resources, Inc. Letter (AECM-88/0243) dated December 14, 1988
 - 6) NRC Letter dated January 17, 1989 (MAEC-89/0012)
 - 7) System Energy Resources, Inc. Letter (AECM-89/0016) dated March 28, 1989
 - 8) NRC Letter dated May 22, 1989 (MAEC-89/0174)

System Energy Resources, Inc. (SERI) is responding by this letter to a written request for additional information by the NRC staff (Reference 8). The request concerned NRC staff review of a proposed change to the Grand Gulf Nuclear Station (GGNS) Operating License pursuant to Generic Letter (GL) 87-09 (Reference 1) as modified by References 2 through 7.

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GRAND GULF NUCLEAR STATION
PORT GIBSON, MISSISSIPPI 39150
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The NRC staff requested in Reference 8 the following:

- a) For each proposed Technical Specification (TS) 3.0.4 exception to be granted under GL 87-09, certify that remedial measures prescribed for the affected action statements are consistent with the UFSAR and its supporting safety analyses.
- b) Identify those administrative controls that have been established to limit the use of the TS 3.0.4 exceptions granted.
- c) Certify the administrative controls implementation.
- d) Certification should address training necessary for ensuring plant operators are made aware of, and are instructed to exercise the controls promulgated in limiting the use of such exceptions.

In addition, the staff requested to be advised when a response to Reference 8 could be expected.

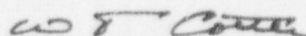
SERI notified the GGNS NRC Project Manager in a telephone call on June 12, 1989 that SERI planned to respond to Reference 8 by July 31, 1989. As mentioned above, this letter is the SERI response to the NRC staff request transmitted in Reference 8. This letter in conjunction with the attachment provides the information requested by the NRC staff.

This information was reviewed and approved by the Plant Safety Review Committee. The Safety Review Committee reviewed and approved the application at the time of the original submittal.

In accordance with the requirements of 10CFR170.21, an application fee was included with the original submittal.

On the basis of the analysis provided in Reference 5 and the discussion in the attachment of this letter, I herewith certify, in response to the NRC staff request for additional information, that for each TS that will be affected by the proposed amendment to TS 3.0.4, the action statement for that TS will provide an adequate level of protection for the startup, shutdown and extended operation of the GGNS. In addition, I herewith certify, that as described in the attachment of this letter, that administrative controls are implemented at the GGNS which will limit the use of the TS 3.0.4 exceptions and that plant operators have been made aware of and instructed to exercise the administrative controls promulgated in limiting the use of such exceptions.

Yours truly,



WTC:mtc
Attachment

cc: (See next page)

cc: Mr. D. C. Hintz (w/a)
Mr. F. 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)
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Dr. Alton B. Cobb (w/a)
State Health Officer
State Board of Health
P.O. Box 1700
Jackson, Mississippi 39205

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, W. T. Cottle, 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.

W. T. Cottle
W. T. Cottle

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 27th day of July, 1989.

(SEAL)

Linda W. Miller
Notary Public

My commission expires:

My Commission Expires Aug. 5, 1991

DESCRIPTION OF RAI RESPONSE

By letter dated August 19, 1988 (AECM-88/0064), SERI applied for changes to the GGNS Unit 1 Technical Specifications (TS) pursuant to Generic Letter (GL) 87-09 regarding TS Sections 3.0 and 4.0. The NRC staff is reviewing this application and requested additional information to complete their review in a letter dated May 22, 1989 (MAEC-89/0174). Below are the SERI responses to each of the NRC staff requests.

NRC Request

"... we request that for each proposed TS exception to be granted under Generic Letter 87-09, you certify that remedial measures prescribed for the affected action statements are consistent with the Updated Safety Analysis Report and its supporting safety analyses."

SERI Response

The NRC staff requested that, for each TS that will be affected by the proposed amendment to TS 3.0.4, SERI should "certify that remedial measures prescribed for the affected action statements are consistent with the Updated Safety Analysis Report and its supporting safety analyses."

The basis for that request for additional information (RAI) clarifies the type of certification required. The NRC staff explains in the May 22, 1989 letter that the certification is necessary to confirm the assumption that "the remedial measures prescribed by the TS action statements for which the TS 3.0.4 exception will be granted provide a sufficient level of protection to permit operational condition changes and safe long-term operation consistent with the licensing basis described in the Updated Safety Analysis Report"

The NRC internal memorandum (memorandum for S. A. Varga and G. M. Holahan from J. Partlow, Implementation of GL 87-09, May 4, 1989) that generated the RAI also clarifies the nature of the certification requested. "In processing GL 87-09 amendments and to avoid the necessity of a labor intensive effort on the part of the staff, licensees should be requested to certify that their programs provide an adequate level of safety and that the Specification 3.0.4 reliefs will be used sparingly." Similarly, the generic safety evaluation report attached to that memorandum indicates that a TS 3.0.4 amendment will be issued upon a determination that "the remedial measures prescribed by the action statement for each change involving the applicability of the Specification 3.0.4 exception should provide a sufficient level of protection to permit operational mode changes and safe long-term operation consistent with the plant's Updated Safety Analysis Report"

SERI understands, therefore, that the certification requested should confirm that, for each TS that will be affected by the proposed amendment to TS 3.0.4, the action statement for that TS will provide, consistent with the requirements of the Atomic Energy Act, an adequate level of protection for the startup, shutdown, and extended operation of the plant. However, we interpret the RAI not to require that the certification confirm those action statements literally are consistent with the safety analyses in the Updated Final Safety Analysis Report (UFSAR). Those analyses were prepared to support the limiting conditions for operation in the plant TS, which ensure that the operation of the plant will provide the adequate level of protection that is documented in the UFSAR. They were not prepared specifically and directly to support the action statements, which, it is recognized and understood, address a theoretical degradation in the operation of the plant but which also ensure an adequate level of protection.

SERI has analyzed the action statements for the thirty-nine TS that will be affected by the proposed amendment to TS 3.0.4. That analysis was submitted to the NRC on December 14, 1988 in AECM-88/0243. It is not based literally on the safety analyses contained in the GGNS UFSAR. However, it confirms that each action statement will provide an adequate level of protection for the startup, shutdown, and extended operation of the plant.

Specifically, with respect to each TS, the analysis (i) describes the safety function or functions involved; (ii) describes the impact of the proposed amendment to TS 3.0.4; (iii) describes the impact of the proposed amendment on the safety function or functions involved; and (iv) demonstrates the acceptability of the proposed amendment because it confirms that the action statement will provide an adequate level of protection and identifies any additional restriction or control necessary to demonstrate that acceptability.

On the basis of that analysis, the SERI Vice President, Nuclear Operations certified in the cover letter of this submittal, in response to the NRC Staff RAI, that for each TS that will be affected by the proposed amendment to TS 3.0.4, the action statement for that TS will provide an adequate level of protection for the startup, shutdown, and extended operation of the GGNS.

NRC Request

In addition, we request that you identify those administrative controls (e.g., maintenance program provisions, plant operating procedures, management directives, onsite safety reviews, etc.) that have been established to limit the use of the Specification 3.0.4 exceptions granted and certify their implementation. Your certification should address training necessary for ensuring that plant operators are made aware of, and are instructed to exercise, the controls promulgated in limiting the use of such exceptions.

SERI Response

GL 87-09 states that "nothing in this staff position should be interpreted as endorsing or encouraging a plant startup with inoperable equipment," and that "plant startup should normally be initiated only when all required equipment is operable and that startup with inoperable equipment must be the exception rather than the rule." In order to determine the effect of the proposed change to Specification 3.0.4 on maintenance priorities, the NRC staff requested (MAEC-88/0302, October 6, 1988) a description of administrative controls on maintenance, startup operation and refueling activities which demonstrate that plant startup and refueling activities will usually be conducted when all required equipment is operable. This description of maintenance administrative controls was provided as Attachment 5 to AECM-88/0243 dated December 14, 1988 but is repeated below.

Control of maintenance at GGNS is accomplished via Plant Administrative Procedure 01-S-07-1. This procedure outlines a prioritized system of control which breaks maintenance down into categories with regard to urgency, releasing organization, and scope.

The priorities are as follows:

Priority-1:

Immediate action is required and should be maintained on a 24-hour basis until the condition requiring immediate action is under control. The Duty Manager shall be notified upon initiation of Priority 1 work. This work is assigned under the following conditions:

- o Immediate danger to the public
- o Immediate personnel hazard
- o Immediate and severe danger to major equipment
- o Any item which will cause the plant to shut down in 24 hours or less

Priority-2:

Action is to be assigned and coordinated on a priority basis to meet imposed time restraints. Equipment down time will be scheduled to support Priority 2 work. Priority 2 maintenance work orders written to repair inoperable equipment are assigned under the following conditions:

- o Non-emergency personnel hazard
- o Major equipment problems which will immediately restrict the desired power level of the plant
- o LCOs not covered by Priority 1
- o Items to support meteorological monitoring system operation

Priority 3, 4, and 5 are lower priorities for routine, fill-in work or work tied to specific milestones (i.e., plant outages).

Maintenance work orders written to repair inoperable equipment that is required by TS to be operable will receive a Priority 1 or 2. Under some cases, plant conditions will not permit working the maintenance work order. These cases are evaluated separately (Priority 5) and are scheduled for work as soon as plant conditions permit. Priority 1 is reserved for items of an immediate safety or plant availability concern and requires action to begin immediately and to continue on a 24-hour basis until the problem is under control. Priority 1 maintenance work orders are rarely received. Therefore, Priority 2 maintenance work orders are generally the highest priority to be worked. This ensures that maintenance work to clear LCOs receives high priority.

GGNS procedures currently require the Shift Superintendent review all LCOs in effect prior to startup to ensure all LCOs are met for which 3.0.4 is applicable. Also, these LCOs are tracked throughout each refueling outage to ensure they are closed prior to startup. The proposed change to Specification 3.0.4 will reduce the number of LCOs that must be cleared prior to startup. However, maintenance work priority will be unchanged following approval of the proposed change to Specification 3.0.4.

GL 87-09 stated that the proposed change to Specification 3.0.4 should not be "interpreted as endorsing or encouraging a plant startup with inoperable equipment." GL 87-09 further stated that "plant startup should normally be initiated only when all required equipment is operable and that startup with inoperable equipment must be the exception rather than the rule." As discussed above, maintenance work priority will be unchanged following approval of the proposed change to Specification 3.0.4. SERI has in addition implemented the following additional controls in the plant startup procedure 03-1-01-1.

1. Throughout each refueling outage LCOs will be tracked with the purpose of clearing them prior to startup whether or not startup is prohibited per Specification 3.0.4.
2. Prior to each startup (i.e., scram recovery or refueling outage), the Shift Superintendent will review LCOs in effect and will contact the Duty Manager if any LCOs are not met. They will review these LCOs with the intent of clearing them, if possible.
3. If reactor startup is not prohibited by 3.0.4 and it is not practicable to clear the remaining LCOs prior to startup, startup may commence with the concurrence of the Plant Safety Review Committee (the onsite safety review committee). Efforts to return the equipment to operability will continue.

The above described administrative controls to limit the use of TS 3.0.4 exceptions are implemented. GGNS plant operators have received the necessary training in the use of both procedures and instructions to exercise the administrative controls limiting the use of TS 3.0.4 exceptions.

The cover letter of this submittal contains the certification by the SERI Vice President, Nuclear Operations that the appropriate administrative controls are implemented and that the necessary plant operator training has been conducted.