



ENTERGY

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C. R. Hutchinson
Vice President
Operations
Grand Gulf Nuclear Station

September 11, 1996

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
Response to Notices of Violation 50-416/9611-04
Report No. 50-416/9611, dated 08/12/96
(GNRI-96/00168)

GNRO-96/00104

Gentlemen:

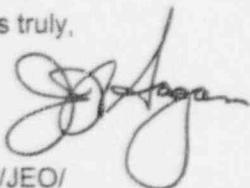
Entergy Operations, Inc. submits the response to Notices of Violation 50-416/9611-04.

Notice of Violation (NOV) 50-416/9611-04 stated that Grand Gulf Nuclear Station (GGNS) was in violation of Criterion V of 10 CFR Appendix B, which states in part, that activities affecting quality shall be prescribed by documented procedures and drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures and drawings.

Guidance for development of such procedures, drawings, and instructions is contained in Regulatory Guide (Reg Guide) 1.33, revision 2, section D. 4. This section states, in part instructions for energizing, filling, venting, draining, startup, shutdown and changing modes of operation should be prepared, as appropriate. Listed under item w. (2) (a) is Emergency Power Sources (e.g., diesel generator, batteries).

Procedures in effect at the time of the subject violation met the requirements of Reg Guide 1.33 for the Standby Diesel Generators. Therefore GGNS considers the requirements of 10CFR Appendix B Criterion V as having been met and denies Notice of Violation 416/9611-04.

Yours truly,

 C. R. Hutchinson

CRH/JEO/
attachment: Response to Violation 50-416/9611-04
cc: Mr. J. E. Tedrow (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. J. W. Yelverton (w/a)
(Continue Next Page)

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September 11, 1996

GNRO-96/00104

Page 2 of 3

cc:

(Continued)

Mr. Leonard J. Callan (w/a)
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U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
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Mr. J. M. Donohew, Project Manager (w/2)
Office of Nuclear Reactor Regulation
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September 11, 1996

GNRO-96/00104

Page 3 of 3

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Mr. M. A. Smith (ANO)
Mr. R. L. Thomas (ECH)
Mr. T. H. Thurmon
Mr. J. E. Venable
Mr. D. W. Vinci (W3)
Mr. D. H. Wells (RB)

Notice of Violation 9611-04

Criterion V of Appendix B to 10CFR 50 states, in part, that activities affecting quality shall be prescribed by documented procedures and drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures and drawings.

Contrary to the above, an activity affecting quality was not properly prescribed by procedures appropriate to the circumstances in that Procedures 06-OP-1P75-M-0001, "Standby Diesel Generator 11 Functional Test," Revision 100 and 06-OP-1P75-M-0002, "Standby Diesel Generator 12 Functional Test," Revision 100, did not provide direction for properly maintaining the oil level in the governor or for periodically checking the governor oil level during operation of the standby diesel generators.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. denies this violation.

II. The Reason for the Violation Denial

On April 24, 1996 the monthly surveillance test of the SDG was performed with a visiting resident inspector observing. After the SDG was started the visiting inspector noted that the governor oil level appeared to drop out of the indication range of the sightglass. The inspector questioned the system engineer about the operation of the governor and proper oil level to be maintained in the sightglass while the SDG was in operation. Later the inspector noted a sticker on the governor pertaining to oil level stipulations. The inspector reviewed the surveillance and daily rounds and concluded that the procedural controls were deficient in that they failed to provide adequate procedures for ensuring continued operation of the SDG. This resulted in the issuance of Notice of Violation 50-416/9611-04.

The notice of violation stated that procedures "did not provide direction for properly maintaining the oil level in the governor or for periodically checking the governor oil level during operation". Grand Gulf Nuclear Station (GGNS) maintains that the procedures in place prior to the April 24, 1996, event did provide for maintaining oil level and did call for periodic monitoring of governor level. GGNS procedures 06-OP-1P75-M-0001 and M-0002 did call for verifying proper oil level prior to SDG start. The Building Rounds required monitoring governor oil level daily. These procedures are only for performing surveillance (one hour runs) and do not require extended run times for the diesels.

The vendor manual for the SDG did contain information related to the governor, however this information did not contain information on specific frequency for monitoring of the governor oil level. Only after contacting the sub-component vendor and reviewing a manual not supplied by the vendor (Cooper) was a recommendation discovered to check the governor oil level immediately following start-up of the SDG.

GGNS believes that the approved vendor for the SDG is the proper source for information used in the development of procedures. Information from other sources, including sub-component stickers should be reviewed by the SDG vendor prior to use to ensure that it does not adversely affect the original SDG design qualification.

As always, GGNS looks for improvements that can enhance the safety and reliability of its equipment. We therefore appreciate the feedback from the visiting resident inspector related to monitoring of the SDG governor oil level. We agree that there was room for SDG procedural enhancement in this area and changes have already been made. However, GGNS does not believe this situation constitutes a violation as cited in inspection report 50-416/9611.

III. Corrective Steps Which Have Been Taken and Results Achieved

Changes were made to Operations SDG Standard Operating Instruction, and monthly surveillance procedures to include specific written criteria for maintaining governor oil levels and for level monitoring frequency while the SDG is running. Also, written guidance for adding oil to the governor was included in the changes.

Changes were made to Operations Daily Round Criteria for the diesel governor to verify sightglass oil level is within 1/8 inch of the top of the sightglass.

IV. Corrective Steps to be Taken to Preclude Further Violations

SDG 18 month surveillance and operability verification surveillance will be changed prior to completion of RF08.

V. Date When Full Compliance Will be Achieved

All actions are scheduled to be complete by the end of RF08.

CONCURRENCE REVIEW FORM

SECTION I

GNRO-96/00104 Rev.0

RESPONSE DUE: 09/11/96
(NRC Required or Target)

SUBJECT: Response to Notices of Violations 9611-04, Inadequate Procedure for Monitoring
SDG Governor Oil Level

James L. Owen 9/10/96
NRC Document Preparer Date

[Signature] 9/10/96
Responsible Section Date
Manager/Superintendent

Commitment Concurrence

SECTION II

Locations	Commitment	Responsible Organization Primary/Secondary	Due Date
Attachment 1, Page 2, Section IV	SDG 18 monthly surveillance and operability verification surveillance will be changed prior to completion of RF08.	Ops	RF08

This letter contains commitments requiring procedural implementation YES (X) NO ()

UFSAR Potential Impact Classification

SECTION III

UFSAR Impact: No X Yes

If Yes:

- A) List UFSAR sections/tables/ _____
figures affected and _____
describe nature of UFSAR _____
- B) UFSAR revision affected: Current Future
- C) Additional comments: _____

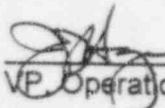
SECTION IV

Concurrence
Review Required
Y N

() (X)

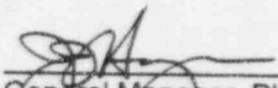
VP, Engineering/Date

(X) ()

 for C.R. Hutchinson

VP, Operations GGNS/Date

(X) ()

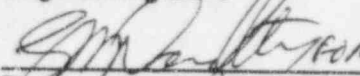


General Manager, Plant
Operations/Date

() (X)

Director, Design
Engineering/Date

(X) ()

 for 9/10/96


Director, Nuclear Safety &
Regulatory Affairs/Date

(X) ()

See Attached sheet (M. McDowell)

Manager, Operations

(X) ()

or 

Manager, P+SE

