



**ENTERGY**

Entergy Operations, Inc.  
P.O. Box 756  
Port Gibson, MS 39150  
Tel: 601 437 2800

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

April 19, 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 50-416/96-06-01 and 02  
Report No. 50-416/96-06, dated 03/21/96  
(GNRI-96/00072)

GNRO-96/00045

Gentlemen:

Entergy Operations, Inc. submits the response to Notices of Violation 50-416/96-06-01 & 02.

Notice of Violation (NOV) 50-416/96-06-01 stated that Grand Gulf Nuclear Station (GGNS) had failed to provide adequate procedural and supervisory oversight for a maintenance task being performed. GGNS agrees with the findings of this inspection report. The effects of this violation (i.e., standby diesel generator inoperability) were discussed in a voluntary Licensee Event Report, (LER 96-002-00), dated February 26, 1996. However, information contained in Attachment 1 of this violation response was not included in LER 96-002-00. The information in Attachment 1 of this response should be reviewed in conjunction with information contained in LER 96-002-00. As noted in the associated inspection report, we were remiss in not identifying and addressing the role of supervisory oversight in preventing such occurrences, particularly when maintenance work is being performed by relatively inexperienced personnel. This has been corrected. GGNS believes that the corrective action outlined in Attachment 1 of this violation will adequately address all issues associated with this event.

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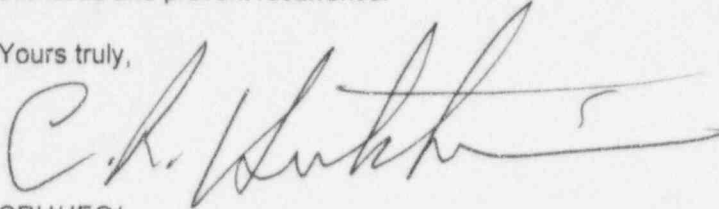
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Notice of Violation 50-416/96-06-02 stated that GGNS failed to follow the steps outlined in plant administrative procedure 01-S-07-43. GGNS agrees with the findings of this inspection report. Attachment 2 to this violation response outlines corrective actions that GGNS believes should address this issue and prevent recurrence.

Yours truly,



CRH/JEO/  
attachment:

- 1) Response to Violation 50-416/96-06-01
- 2) Response to Violation 50-416/96-06-02

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)

Mr. Leonard J. Callan (w/a)  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

Mr. J. N. Donohew, Project Manager (w/2)  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop 13H3  
Washington, D.C. 20555

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bcc: Mr. D. R. Franklin (w/a)  
Ms. C. W. Gunn (w/a)  
Mr. J. E Owens (w/a)  
Mr. G. D. Swords (w/a)  
Required Reading Coordinator (w/a)  
SRC Secretary (w/a)  
File (LCTS/RPTS) (w/a)  
File (NS&RA) (w/a)  
File (Central) (w/a) (14)

INPO Records Center (w/a)  
700 Galleria Parkway  
Atlanta, Georgia 30339-5957

Mr. W. T. Donovan (w/a)  
Illinois Power Company  
Clinton Power Station Mail Stop V-920  
P.O. Box 678  
Clinton, Illinois 61727

ccmail:

Mr. P. W. Alberstadt (ECH)	Mr. M. G. Hurley
Mr. C. A. Bottemiller	Mr. C. R. Hutchinson
Mr. O. P. Bulich (RB)	IEA (ANO)
Mr. R. W. Byrd	Ms. S. B. Mahoney
Mr. W. F. Clark	Ms. J. M. Manzella (W3)
Mr. D. G. Cupstid	Mr. J. R. McGaha (RB)
Mr. J. P. Czaika	Mr. M. J. Meisner
Mr. L. F. Dale	Mr. D. C. Mims (ANO)
Mr. L. F. Daughtery	Mr. L. B. Moulder
Mr. G. G. Davie (W3)	Mr. R. V. Moomaw
Mr. J. G. Dewease (ECH)	Mr. R. L. Patterson
Mr. M. A. Dietrich	Mr. F. T. Philpot (ANO)
Mr. C. M. Dugger	Mr. T. E. Reaves (ECH)
Mr. C. V. Ellsaesser	Mr. J. C. Roberts (ECH)
Mr. J. L. Ensley (ESI)	Mr. J. L. Robertson
Mr. J. J. Fisicaro (RB)	Mr. M. A. Smith (ANO)
Mr. T. W. Gates (RB)	Mr. R. L. Thomas (ECH)
Mr. T. J. Gaudet (W3)	Mr. T. H. Thurmon
Ms. C. W. Gunn	Mr. J. E. Venable
Mr. J. J. Hagan	Mr. D. W. Vinci (W3)
Mr. C. C. Hayes	Mr. D. H. Wells (RB)

**Notice of Violation 96-06-01**

Technical Specification 5.4.1.a requires, in part that written procedures be established covering the activities referenced in Appendix A to Regulatory Guide 1.33, Revision 2, 1978. Section 9 of Appendix A requires that the licensee have maintenance procedures.

Procedure 07-S-15-6, "Lubricating Oil Sample Selection," was issued to provide instructions for obtaining lubrication oil samples from the Division III Standby Diesel Generator.

Contrary to the above, Procedure 07-S-15-6 did not properly establish the activity of sampling the Division III Standby Diesel Generator in that the procedure did not provide specific directions for obtaining the sample. As a result of this procedural deficiency, the diesel generator was rendered inoperable for a period of 7 days.

**I. Admission or Denial of the Alleged Violation**

Entergy Operations, Inc. admits to this violation.

**II. The Reason for the Violation, if Admitted**

On January, 19, 1996, a repetitive task was issued for maintenance personnel to obtain an oil sample from the Division 3 SDG. The task description said to take a sample from both crankcases using generic procedure 07-S-15-06, Lubricating Oil Sample Collection. The procedure gives generic instructions on collecting oil samples. With the procedure containing only generic instructions, the repetitive task should have contained specific instruction for collecting an oil sample from the Division 3 SDG.

Maintenance personnel attempted to obtain the oil sample from the Division 3 SDG scavenger strainer. The strainer is adjacent to the reservoir where the sample is normally taken. After partially disassembling the strainer cover, the maintenance person became uncertain about the task and stopped to consult a co-worker. After a brief discussion, the mechanic realized he had made an error. When attempting to close the strainer, the cover was not seated properly. The reservoir was then opened and the sample taken from the appropriate location. The task was completed and the Work Order closed. Management expectation of the mechanic was to make his supervisor aware of this error. This was not done, therefore, there was no evaluation to determine whether a retest should be performed.

The maintenance personnel assigned this task was unfamiliar with this task. No pre-job briefing was held therefore supervisory oversight was inadequate. During a pre-job briefing, there would have been opportunity for the supervisor to inquire concerning the maintenance person's familiarity with the task or for the maintenance person to question the process himself.

These factors described above, inadequate work instructions, failure to adhere to management expectations, and inadequate supervisory oversight were the fundamental factors contributing to this event.

**III. Corrective Steps Which Have Been Taken and Results Achieved**

- Maintenance personnel removed the oil scavenger strainer cover, and inspected the o-ring. The cover was reinstalled, and inspected to ensure proper seating. A leak check was satisfactorily performed with oil pressure applied.
- Quality Deficiency Report was written by Maintenance to document this deficiency and track corrective actions.
- The work instruction for task was revised to incorporate specific directions for obtaining oil samples from the Division 3 SDG.
- The personnel involved were counseled concerning management's expectations to inform supervision concerning mistakes or problems with performance of a task.

**IV. Corrective Steps to be Taken to Preclude Further Violations**

- Review procedure 07-S-15-06, "Lubricating Oil Sample Selection," for technical adequacy. Verify that applicable tasks are evaluated to ensure that instructions are component specific and that correct sampling methods are indicated in the instructions.
- Review oil sampling tasks to ensure that the sampling methods chosen do not adversely impact plant equipment.
- Reinforce management expectations and supervisor guidance on the methods for worker selection. Ensure that supervisors use pre-job briefings and provide overall supervision and direction to craft under their control.
- Reinforce to all personnel the requirements for handling mistakes or problems and when the job supervisor should be contacted.

V. Date When Full Compliance Will be Achieved

All actions are scheduled to be completed by June 30, 1996.

**Notice of Violation 96-06-02**

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

Updated Final Safety Analysis Report, Section 3.7, stated, in part, that since all structures, systems, and components related to plant safety are required to have the capability to withstand potential earthquakes, each of these structures or systems have been designed to seismic Category I. Non-safety related systems and components, whose continued function is not required to shutdown the plant or mitigate the consequences of a loss-of-coolant accident, but whose failure during a safe shutdown earthquake could affect safety-related equipment, were seismically analyzed and supported, as necessary, to prevent such collapse on safety-related equipment.

Procedure 01-S-07-43, "Safe Handling of Loose Items Inside the Plant," was issued to implement the requirements stated in the Updated Safety Analysis Report. Step 6.4.14 of Procedure 01-S-07-43 stated, in part, that loose items, which weigh more than 10 pounds but less than 200 pounds and will remain for a long duration, must be tightly restrained to a permanent structural component such as handrails, structural steel, or reinforced concrete walls, floors, or columns.

Contrary to the above, on January 29, 1996, the inspectors identified that the storage locker, which weighs approximately 150 pounds, in the remote shutdown panel room did not meet the requirements specified in Procedure 01-S-07-43, in that the locker was not tightly restrained to a permanent structural component.

**I. Admission or Denial of the Alleged Violation**

Entergy Operations, Inc. admits to this violation.

**II. The Reason for the Violation, if Admitted**

Grand Gulf Administrative procedure 01-S-07-43 does not contain adequate direction for ensuring the requirements of the Updated Final Safety Analysis Report, section 3.7 are carried out. Additionally, the mechanisms for communicating and ensuring that the requirements of 01-S-07-43 are followed have not been effective.

**III. Corrective Steps Which Have Been Taken and Results Achieved**

- A Quality Deficiency Report (QDR 020-96) was written to document and address the items discovered in the remote shutdown room and the ESF switchgear room.
- The cabinet in the Remote Shutdown Panel Room was secured.

- On March 21, 1996 a Plant Stand-Down was conducted to address Plant issues. Temporary storage of items in Category 1 buildings was one of the topics of discussion.

**IV. Corrective Steps to be Taken to Preclude Further Violations**

- Revise the standard Grand Gulf Nuclear Station-Civil Standard-17 and plant procedure 01-S-07-43 to include maps with "safe areas" where equipment can be stored on each floor without seismic concern and clarify the criteria (weight limits, distances, tie down, etc.) used in the standard and procedure.
- Perform a 100% walkdown of all accessible areas of Category 1 buildings.
- Modify the Work Incomplete Tag to address the requirements of 01-S-07-43.
- Revise the housekeeping procedure (01-S-07-9) to incorporate a requirement to inspect for loose items during housekeeping walkdowns.
- Communicate the loose items storage requirements and procedure at the next Plant Stand-Down in the second quarter of 1996.
- This event will be reviewed by the Maintenance, Engineering Support, Operations, Chemistry, and Health Physics Training Review Groups to assess the need for additional training once Civil Standard 17 and procedure 01-S-07-43 are revised.

**V. Date When Full Compliance Will be Achieved**

All actions are scheduled to be completed by August 31, 1996.