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Jerry C. Roberts  
Director  
Nuclear Safety Assurance

November 28, 2000

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29  
Request for Exemption to 10CFR50.71(e)(1) UFSAR Updates By  
Use of a Utility Maintained Website For UFSAR Access

GNRO-2000/00086

Gentlemen:

In accordance with 10CFR50.12, Entergy Operations, Inc. requests an exemption to the requirements of 10CFR50.71(e)(1) for Grand Gulf Nuclear Station. Specifically, we request to discontinue submission of updates to the NRC of the Updated Final Safety Analysis Report (UFSAR). Instead, a complete UFSAR will be available on the World Wide Web (WWW) at a publicly accessible Internet website to be operated and maintained by Entergy Operations. The UFSAR will be maintained and updated on this website in accordance with the frequency outlined in 10CFR50.71(e). Our current plans are to update the web based UFSAR on a more frequent basis than annually or 6 months after each refueling outage, with a movement towards a living update frequency. We currently submit our complete (all chapters, pages and figures included) UFSAR, with replacement pages incorporated, via CD-ROM. Our UFSAR CD-ROM is submitted on a more frequent basis, than required by or called for in 10CFR50.71(e).

While the website will be publicly accessible, website security will be such that only authorized personnel will have access to modify or change the UFSAR files located on the web server. A complete CD-ROM copy of the UFSAR will be available to the NRC, should website problems significantly affect NRC access.

This exemption request meets the special circumstances of 10CFR50.12(a)(2)(ii) and (vi) because the requirements of the rule are not necessary to achieve the underlying purpose of the rule and there are material circumstances (advances in electronic access technology) that were not considered when the regulation was adopted. We also believe it to be in the public interest to grant the exemption since it will allow more accessibility of the UFSAR to the public.

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Our present UFSAR CD-ROM submission is approximately 600 megabytes in size. Due to the size and complexity (multiple files and directories) of the submission, it cannot be submitted via the NRC's Electronic Information Exchange (EIE) website. It is our understanding that our currently submitted 10CFR50.71 UFSAR CD-ROM updates will not be placed in ADAMS. This requires the NRC to physically distribute our CD-ROM. By providing our UFSAR on the WWW, we can reduce and eliminate the technical issues related to our present submission UFSAR update via a CD-ROM. The great benefit to the WWW is that the public has access to it and NRC personnel can access information at their computer workstation on demand. We will continue to follow the update requirements of 10CFR50.71(e), therefore, users of the Internet based UFSAR will be assured of using the latest updated information (as outlined in 10CFR50.71). Our UFSAR update process will be available for NRC inspection and would only allow changes to the online UFSAR via a formal Licensing Document Change process. All UFSAR changes would be reviewed using a 10CFR50.59 review process.

We believe this change is a reasonable request and is similar to the staff's efforts to allow licensee's to submit and receive data via electronic means. Our request is also similar the recent initiative by the NRC in regard to the ADAMS project and the theme that personnel access Licensee information using the NRC website. We understand that this is considered a new approach with the staff in regard to information submission and we are willing to offer ourselves as a pilot plant in this area. This item has been discussed with NIRMA personnel and does not conflict with their work in the area of Living UFSAR. In fact, a web-based UFSAR complements and promotes the living UFSAR concept.

We look forward to discussions with the staff in this area. We will work with the staff as needed on this project work since there are benefits for both the Licensee and the NRC. If you need further information on this topic please contact Michael Larson at 601-437-6685.

Yours truly,



JCR/MJL

cc: (See Next Page)  
Attachment: 1. Licensee Identified Commitments

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cc:

Hoeg	T. L.	GGNS Senior Resident)
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Reynolds	N. S.	
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Mr. E. W. Merschoff (w/2)  
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**ATTN: ADDRESSEE ONLY**

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**ATTACHMENT 1 TO GNRO-2000/00086  
LICENSEE-IDENTIFIED COMMITMENTS**

<b>Letter #:</b>	GNRO-2000/00086		
COMMITMENT	TYPE <small>(Check only one type)</small>		SCHEDULED
	ONE- TIME ACTION	CONTINUING COMPLIANCE	COMPLETION DATE <small>(If Required)</small>
In case of an extensive website failure, we will notify the NRC and submit a complete CD-ROM copy of the UFSAR. An extensive website failure would be one in which the website was not operational for an extended period of time.		YES	UPON APPROVAL
A complete UFSAR will be available on the World Wide Web (WWW) at a publicly accessible Internet website to be operated and maintained by Entergy Operations.		YES	UPON APPROVAL