



Entergy Operations, Inc.  
P. O. Box 756  
Port Gibson, MS 39150  
Tel 601 437 6409  
Fax 601 437 2795

William A. Eaton  
Vice President,  
Operations  
Grand Gulf Nuclear Station

February 15, 2001

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  
Correction to Cycle 12 Reload  
Proposed Amendment to the Operating License, LDC-2000-076

Reference: Letter: W. A. Eaton to US Nuclear Regulatory Commission, "Grand Gulf Nuclear Station Cycle 12 Reload Proposed Amendment to the Operating License, LDC-2000-076", GNRO-2000/00084, dated November 10, 2000

GNRO-2001/00011

Gentlemen:

On November 10, 2000 Entergy Operations, Inc. (EOI) requested NRC staff approval of a proposed change to the Grand Gulf Nuclear Station (GGNS) Technical Specifications (TS) (TAC No. MB0514). This proposed amendment requested a change to the minimum critical power ratio safety limit (SLMCPR) and changes to the references for the analytical methods used to determine the core operating limits. This change is required to support the GGNS upcoming Cycle 12 operation.

The proposed amendment reflected a decrease of the two recirculation loop SLMCPR limit from 1.09 to 1.08 with the single recirculation loop SLMCPR limit remaining at 1.10. Subsequent to issuing the referenced letter it was found that the analysis supporting the proposed amendment did not correctly account for the effects of channel bow. A reanalysis has been performed correctly accounting for channel bow.

APO1

The results of the reanalysis continue to support the proposed SLMCPR limit. The calculated percentage of rods in boiling transition has changed as a result of the reanalysis, but remains under the limit of less than 0.1%.

Only Table 2 and Figure 1 of Attachment 4 of the referenced submittal are affected by the reanalysis. The corrected pages are included in the Attachment of this letter. This information is considered to be proprietary. In accordance with 10 CFR 2.790, an application for withholding this information in whole from public disclosure and the accompanying affidavit by the information owner, Framatome ANP, is included in the Attachment.

The reanalysis resulted in no change to the technical basis of the request or to the requested SLMCPR limits. Therefore, this correction to the referenced amendment request does not require review by either the Plant Safety Review Committee or the Safety Review Committee.

The proposed change introduces no new commitments.

Entergy Operations requests NRC approval and issuance of the proposed Technical Specifications changes prior to the Grand Gulf Refueling Outage 11 now scheduled to begin in April 2001. Entergy Operations requests that the amendment go into effect after Operating Cycle 11, but prior to reactor steam dome pressure reaching 785 psig or core flow reaching 10% rated core flow in operating Cycle 12. Although this request is neither exigent nor emergency, your prompt review is requested.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 15, 2001.

Very truly yours,



/as

Attachment: Corrected pages to Attachment 4 of GNRO-2000/00084

cc: (see next page)

cc: Mr. Ellis W. Merschoff  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

Mr. S. P. Sekerak, NRR DLPM/PD IV-1 (w/2)  
**ATTN: ADDRESSEE ONLY**  
U. S. Nuclear Regulatory Commission  
One Flint North, Mail Stop 07-D1  
11555 Rockville Pike  
Rockville, MD 20852-2378

Mr. T. L. Hoeg, GGNS Senior Resident  
Mr. D. E. Levanway (Wise Carter)  
Mr. L. J. Smith (Wise Carter)  
Mr. N. S. Reynolds  
Mr. H. L. Thomas

## AFFIDAVIT

STATE OF WASHINGTON     )  
                                      ) ss.  
COUNTY OF BENTON        )

1.       My name is Jerald S. Holm. I am Manager, Product Licensing, for Framatome ANP Richland, Inc. ("FRA-ANP"), and as such I am authorized to execute this Affidavit.

2.       I am familiar with the criteria applied by FRA-ANP to determine whether certain FRA-ANP information is proprietary. I am familiar with the policies established by FRA-ANP to ensure the proper application of these criteria.

3.       I am familiar with the FRA-ANP information included in the attachment to letter KVV:01:045, dated February 7, 2001, from K. V. Walters to Mr. J. B. Lee, Entergy Operations, Inc. This attachment is referred to herein as "Document." Information contained in this Document has been classified by FRA-ANP as proprietary in accordance with the policies established by FRA-ANP for the control and protection of proprietary and confidential information.

4.       This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by FRA-ANP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in the Document be withheld from public disclosure.

6. The following criteria are customarily applied by FRA-ANP to determine whether information should be classified as proprietary:

- (a) The information reveals details of FRA-ANP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FRA-ANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRA-ANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FRA-ANP, would be helpful to competitors to FRA-ANP, and would likely cause substantial harm to the competitive position of FRA-ANP.

7. In accordance with FRA-ANP 's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside FRA-ANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FRA-ANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge,  
information, and belief.

Gerald S. Holm

SUBSCRIBED before me this 7<sup>th</sup>  
day of February, 2001.

Susan K. McCoy

Susan K. McCoy  
NOTARY PUBLIC, STATE OF WASHINGTON  
MY COMMISSION EXPIRES: 01/10/04

