



Entergy Operations, Inc.
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August 7, 2007

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Supplemental Information for Licensing Amendment Request
Pertaining to Control Room Envelope Habitability
River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47

Reference: License Amendment Request (letter no. RBG-46712)
Control Room Envelope Habitability in Accordance with TSTF-448,
Revision 3, Using the Consolidated Line Item Improvement Process,
dated June 16, 2007

RBFI-07-0146
RBG-46722

Dear Sir or Madam:

On July 16, 2007, Entergy Operations, Inc. filed an application to amend the operating license for River Bend Station (RBS) (referenced above). The proposed amendment would modify the Technical Specification related to Control Room Envelope Habitability in accordance with TSTF-448, Revision 3 under the Consolidated Line Item Improvement Program. This letter provides supplemental information to clarify certain items in the application.

Attachment 1 revises the description and assessment on affected pages of Letter No. RBG-46712. The changes are noted with change bars in the left hand column. If you have any questions or require additional information, please contact Bill Brice at 601-368-5076.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 7, 2007.

Sincerely,

A handwritten signature in black ink, appearing to read "D P Wiles".

Dennis P. Wiles
Director - Engineering

DPW/DHW

Attachment:
Description and Assessment (Markup)

A102

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cc: Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

U.S. Nuclear Regulatory Commission
ATTN: Mr. Bhalchandra Vaidya, NRR/DORL (w/2)
Mail Stop OWFN/O-7D1A
Washington, D.C. 20555-0001

NRC Senior Resident Inspector
River Bend Station

Attachment 1

RBG-46722

Description and Assessment (Markup)

1.0 DESCRIPTION

This letter is a request to amend Operating License NPF-47 for River Bend Station, Unit 1 (RBS).

The proposed amendment would modify Technical Specification (TS) requirements related to control room envelope habitability in TS 3.7.2, "Control Room Fresh Air (CRFA) System" and TS Section 5.5, "Programs and Manuals."

The changes are consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-448 Revision 3. The availability of the TS improvement was published in the *Federal Register* on January 17, 2007 (FR 72 2022) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy has reviewed the safety evaluation dated January 17, 2007, as part of the CLIIP. This review examined the NRC staff's evaluation, as well as the supporting information provided to support TSTF-448. Entergy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC are applicable to RBS and justify this amendment for the incorporation of the changes to the RBS TS.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the TS changes described in the TSTF-448, Revision 3, or the applicable parts of the NRC staff's model safety evaluation dated January 17, 2007, except for Evaluation No. 6 as described below. The parts of Section 3.0 "Technical Evaluation," of the model Safety Evaluation (SE) that are applicable to RBS are Evaluations 2, 5, and 6.

Evaluation No. 6 for RBS should read as follows:

In the emergency mode of operation, the CRFA system isolates unfiltered ventilation air supply intakes, filters the emergency ventilation air supply to the CRE; and pressurizes the CRE to minimize unfiltered air leakage past the CRE boundary. The licensee proposed to revise SR 3.7.2.4 by replacing the CRE pressurization surveillance requirement (SR) with a new CRE leakage measurement SR. Currently, SR 3.7.2.4 requires verifying that each CRFA subsystem can maintain a positive pressure of $\geq 1/8$ inch water gauge relative to outside atmosphere during the emergency mode of operation at a flow rate of ≤ 4000 cfm. The replacement of this SR is proposed because measurements of unfiltered air leakage into the CRE at numerous reactor facilities demonstrated that a basic assumption of this SR, an essentially leak-tight CRE boundary, was incorrect for most facilities. Hence, meeting this SR by achieving the required CRE pressure is not necessarily a conclusive indication of CRE boundary leak tightness, i.e., CRE boundary operability. In its response to GL 2003-01, June 25, 2005, the licensee reported that it had determined that RBS CRE pressurization surveillance, SR 3.7.2.4 was inadequate to demonstrate the operability of the CRE boundary, and proposed to replace it with an leakage measurement SR and a CRE Habitability Program in TS Section 5.5 in accordance with the approved version of TSTF-448. Based on

the adoption of TSTF-448, Revision 3, the licensee's proposal to revise SR 3.7.2.4 is acceptable.

2.3 License Condition Regarding Initial Performance of New Surveillance and Assessment Requirements

Entergy proposes the following as a license condition to support implementation of the proposed TS changes (in subpart (a) of the license condition below, Entergy proposes a surveillance grace period as allowed by SR 3.0.2 of 18 months, which differs from the model application value of 15 months. This discrepancy was noted in an NRC memorandum from C. Craig Harbuck to Timothy J. Kobetz, dated February 2, 2007 (ADAMS Accession Number ML070330657)):

Upon implementation of Amendment No. xxx adopting TSTF-448, Revision 3, the determination of Control Room Envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c.(i), and the assessment of CRE habitability as required by Specification 5.5.13.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.17.d, shall be considered met. Following implementation:

- (a) The first performance of SR 3.7.2.4, in accordance with Specification 5.5.14.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from May 2004, the date of the most recent successful tracer gas test, as stated in the January 25, 2005 letter response to Generic Letter 2003-01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.14.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from May 2004, the date of the most recent successful tracer gas test, as stated in the January 25, 2005 letter response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.14.d, shall be within 24 months, plus the 182 days allowed by SR 3.0.2, as measured from May 2004, the date of the most recent successful pressure measurement test, or within 182 days if not performed previously.

3.0 Regulatory Analysis

3.1 *No Significant Hazards Consideration Determination*

Entergy has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the *Federal Register* on January 17, 2007 (FR 72 2022) as part of the CLIP. Entergy has concluded that the proposed NSHCD presented in the *Federal Register* notice (FR 72 2022) is applicable to RBS and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).