

From: [Wang, Alan](#)
To: [Ward, Steven](#); [SEITER, JEFFERY ALAN](#)
Cc: [Lent, Susan](#); [Burkhardt, Janet](#); [Robinson, Christopher](#)
Subject: Grand Gulf Nuclear Station Request for Additional Information Regarding 18 to 24 Month License Amendment Request (TAC ME9764)
Date: Wednesday, May 01, 2013 11:23:11 AM

Jeff and Steve,

By letter dated October 2, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12277A080), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) to amend the technical specifications (TS) of Grand Gulf Nuclear Station (GNNS), Unit 1. The LAR proposes to extend certain 18-month TS surveillance requirement (SR) frequency to 24-months SR frequency to accommodate a 24-month fuel cycle.

The NRC staff has determined that additional information is needed to complete our review of this request. The following requests for additional information (RAIs) are related to your LAR dated October 2, 2012:

1. LAR Section 3.1, states "GNNS setpoint calculations, and affected calibration and functional test procedures, have been revised, or will be revised prior to implement to reflect the new 30-month drift values. The revised setpoint calculations were developed in accordance with Setpoint Methodology JS-09, Rev. 1, 'Methodology for the Generation of Instrument Loop Uncertainty & Setpoint Calculations.' "

Please provide calculations used for the evaluation of the as-left tolerance, as-found tolerance, total loop uncertainty, nominal trip setpoint, and allowable value for representative TS functions, including the loss of voltage (i.e., for SR 3.3.8.1.3 Function 3.3.8.1-1.2a), and degraded voltage (i.e., for SR 3.3.8.1.3 Function 3.3.8.1-1.2c), functions in TS Table 3.3.8.1-1, "Loss of Power Instrumentation." Please also describe how the tolerances included in these setpoint calculations comply with the 95/95 confidence level specified in Regulatory Guide 1.105, "Setpoints for Safety-Related Instrumentation," Revision 3, issued December 1999 (ADAMS Accession No. ML993560062).

Please provide procedures or describe actions to be taken when (a) the as-found data is beyond the as-found tolerance limit established in the setpoint calculation, (b) when, at the end of the surveillance test, the instrument channel cannot be set within the as-left tolerance limit established in the setpoint calculation, and (c) when the as-found data is beyond allowable value during surveillance tests.

2. LAR Attachment 5 states that the proposed changes were evaluated in accordance with the guidance provided in the U.S. Nuclear Regulatory Commission (NRC) Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991 (ADAMS Accession No. ML013100215).

Please provide representative drift calculations, including drift evaluation for the

loss of voltage (i.e., for SR 3.3.8.1.3 Function 3.3.8.1-1.2a), and degraded voltage (i.e., for SR 3.3.8.1.3 Function 3.3.8.1-1.2c), functions in TS Table 3.3.8.1-1, "Loss of Power Instrumentation." Please describe how the calculations address:

- a. The number of samples used and the number of outliers rejected in the drift evaluation to ensure 95/95 confidence level specified in Regulatory Guide 1.105.
- b. How the drift data was grouped properly to ensure a normal distribution of the drift samples.
- c. The methodology used to calculate the drift limit for 30-month fuel cycles from the current plant drift data for 18-month fuel cycles.

This RAI was discussed with Mr. Steven Ward on May 1, 2013, and it was agreed that a response would be provided within 30 days of receipt of this email. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1445 or via e-mail at Alan.Wang@nrc.gov.

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