

## NRR-PMDAPEm Resource

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**From:** Wang, Alan  
**Sent:** Tuesday, March 18, 2014 12:38 PM  
**To:** SEITER, JEFFERY ALAN  
**Cc:** Burkhardt, Janet  
**Subject:** Grand Gulf Nuclear Station Request for Additional Information Regarding Maximun Extended Load Line Limit Plus Amendment Request (TAC MF2798)

Jeff,

By letter dated September 25, 2013 (Agencywide Document Access and Management System (ADAMS) Accession No. ML13269A140), Entergy Operations Inc. (Entergy, the licensee) submitted a license amendment request (LAR) to allow Grand Gulf Nuclear Station, Unit No. 1 (GGNS) to operate in the expanded maximum extended load line limit analysis plus (MELLLA+) domain.

### Request for Additional Information:

The proposed change to TS 3.3.1.1 Condition J, required action J.3 and TS 5.6.7 are not consistent with GGNS's current approved Technical Specifications and the improved Standard Technical Specification use and application section. In addition, the second and third issues noted below are applicable to the proposed TSs for GGNS. Provide TSs that are consistent with GGNS's current approved Technical Specifications and the improved Standard Technical Specification use and application section.

### Basis for the Request

On January 11, 2013, the NRC safety evaluation (ML12320A415) approved topical report NEDC-33075P. In our safety evaluation the US Nuclear Regulatory Commission (NRC) stated the following conclusion:

Section 8 of NEDC-33075P, Revision 7 [1] provides a description of required changes to Technical Specifications, and an example is provided in Appendix A. The proposed Technical Specifications are an acceptable implementation of DSS-CD. (See above note in Section 3.2.5.)

The note in Section 3.2.5 states that:

The NRC staff agrees with the technical intent provided in the example Technical Specifications; however, the example Technical Specifications are not written consistent with the improved Standard Technical Specifications format. When applying for this Topical Report, licensees should submit Technical Specifications that are consistent with their current approved Technical Specifications and the improved Standard Technical Specification use and application section.

This note was placed into the safety evaluation because TS 3.3.1.1 Condition I was not found to be acceptable because its structure is not consistent with NUREG-1430 through NUREG-1434 use and application section.

There are three specific problems with the Technical Specifications in NEDC-33075:

First, is the numbering of Condition I, required actions. They should be numbered I.1, I.2, and I.3. The I.2.1 and I.2.2 nomenclature is used not used correctly.

Secondly, the completion time for required action I.2.2 is not correctly stated; 90 days is an error in structure, it should state "immediately." Licensees should immediately initiate action in accordance with specification 5.6.6. Specification 5.6.6 then tells them that they have within the following 90 days to submit the report.

Thirdly, Technical Specification Section 5.6.6 is not stated correctly. It should not state, "within 90 days of entering Condition I," it should state, "within the following 90 days."

The proposed changes do not incorporate the correct usage and structure of technical specifications. The corrections stated above are consistent with the approved use and application section in NUREG-1433 and GGNS's current technical specifications. An example in NUREG-1433 that shows this structure is TS 3.3.3.1, "Post Accident Monitoring," Conditions B and F, and TS 5.6.5, Post Accident Monitoring Report." An example in GGNS's TS is also TS 3.3.3.1, "Post Accident Monitoring," Conditions B and F.

This RAI was discussed with Mr. Jeff Seiter on March 17, 2014, and it was agreed that a response would be provided within 60 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](mailto:Alan.Wang@nrc.gov).

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