

## NRR-PMDAPEm Resource

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**From:** Wang, Alan  
**Sent:** Tuesday, July 29, 2014 12:21 PM  
**To:** BURMEISTER, BARRY M; Joseph Clark (JCLARK@entergy.com)  
**Cc:** Burkhardt, Janet  
**Subject:** River Bend Station, Unit 1, Request for Additional Information Regarding Technical Specification Task Force Traveler (TSTF) - 423 (TAC No. MF2299)  
**Attachments:** Reference Error RAI.docx

Barry and Joey,

by letter dated June 13, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13169A068), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) to revise the River Bend Station, Unit No. 1 (RBS) Technical Specification (TS). Specifically, this LAR proposed adopt changes consistent with TSTF -423, Revision 0, "Technical Specification End States, NEDC-32988-A." The proposed amendment would modify RBS TS to risk-inform requirements regarding selected Required Action end states. The Nuclear Regulatory Commission (NRC) staff has reviewed the June 13, 2013, submittal regarding changes to the selected Required end states and has determined that the attached request for additional information is required to complete its review of the amendment request.

This request was discussed with Mr. Barry Burmeister of your staff on July 29, 2014, and it was agreed that a response would be provided within 30 days from the issuance 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).

Alan B. Wang

Project Manager (River Bend Station)

Nuclear Regulatory Commission

Division of Operating Reactor Licensing

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 1459

**Mail Envelope Properties** (Alan.Wang@nrc.gov20140729122000)

**Subject:** River Bend Station, Unit 1, Request for Additional Information Regarding  
Technical Specification Task Force Traveler (TSTF) - 423 (TAC No. MF2299)  
**Sent Date:** 7/29/2014 12:20:42 PM  
**Received Date:** 7/29/2014 12:20:00 PM  
**From:** Wang, Alan

**Created By:** Alan.Wang@nrc.gov

**Recipients:**  
"Burkhardt, Janet" <Janet.Burkhardt@nrc.gov>  
Tracking Status: None  
"BURMEISTER, BARRY M" <BBURMEI@entergy.com>  
Tracking Status: None  
"Joseph Clark (JCLARK@entergy.com)" <JCLARK@entergy.com>  
Tracking Status: None

**Post Office:**

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MESSAGE	1353	7/29/2014 12:20:00 PM
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**Expiration Date:**  
**Recipients Received:**

July 22, 2014

MEMORANDUM TO: \_\_\_\_\_ Doug A. Broaddus, Chief  
\_\_\_\_\_ Plant Licensing Branch LPL-4  
\_\_\_\_\_ Division of Operating Reactor Licensing  
\_\_\_\_\_ Office of Nuclear Reactor Regulation

FROM: \_\_\_\_\_ Robert B. Elliott, Chief ~~/RA/~~  
\_\_\_\_\_ Technical Specifications Branch  
\_\_\_\_\_ Division of Safety Systems  
\_\_\_\_\_ Office of Nuclear Reactor Regulation

SUBJECT: \_\_\_\_\_ RIVER BEND STATION, UNIT 1 - REQUEST FOR ADDITIONAL  
\_\_\_\_\_ INFORMATION RELATED TO THE ADOPTION OF TECHNICAL  
\_\_\_\_\_ SPECIFICATION TASK FORCE (TSTF) TSTF 423, REVISION 1,  
\_\_\_\_\_ "TECHNICAL SPECIFICATIONS END STATES, NEDC 32988-A"  
\_\_\_\_\_ (TAC NO. MF2299)

By letter dated June 13, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13169A068), Entergy Operations, Inc. (Entergy) (the Licensee) submitted a license amendment request (LAR) which proposed changes to the Technical Specifications (TSs) for River Bend Station, Unit 1 (RBS) nuclear facility. Specifically, the licensee proposed to adopt U.S. Nuclear Regulatory Commission (NRC) approved Revision 1 to Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) Change traveler TSTF 423, "Technical Specifications End States, NEDC 32988-A," dated December 22, 2009.

The Technical Specifications Branch (STSB) of the Division of Safety Systems (DSS) has identified the need for additional information to complete its review of the LAR. The staff RAI is enclosed.

Docket No: ~~50-458~~

Enclosure:  
Request for Additional Information

CONTACT: ~~Ravi Grover, NRR/DSS/STSB~~  
\_\_\_\_\_ ~~301 415 2166~~

July 22, 2014

MEMORANDUM TO: ~~\_\_\_\_\_ Doug A. Broaddus, Chief~~  
~~\_\_\_\_\_ Plant Licensing Branch LPL-4~~  
~~\_\_\_\_\_ Division of Operating Reactor Licensing~~  
~~\_\_\_\_\_ Office of Nuclear Reactor Regulation~~

FROM: ~~\_\_\_\_\_ Robert B. Elliott, Chief /RA/~~  
~~\_\_\_\_\_ Technical Specifications Branch~~  
~~\_\_\_\_\_ Division of Safety Systems~~  
~~\_\_\_\_\_ Office of Nuclear Reactor Regulation~~

SUBJECT: ~~\_\_\_\_\_ RIVER BEND STATION, UNIT 1 REQUEST FOR ADDITIONAL~~  
~~\_\_\_\_\_ INFORMATION RELATED TO THE ADOPTION OF TECHNICAL~~  
~~\_\_\_\_\_ SPECIFICATION TASK FORCE (TSTF) TSTF 423, REVISION 1,~~  
~~\_\_\_\_\_ "TECHNICAL SPECIFICATIONS END STATES, NEDC 32988-A"~~  
~~\_\_\_\_\_ (TAC NO. MF2299)~~

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~~CONTACT: Ravi Grover, NRR/DSS/STSB~~  
~~\_\_\_\_\_ 301 415 2166~~

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~~ADAMS Accession No. ML14199A528 \_\_\_\_\_ NRR-106~~

OFFICE	NRR/DSS/STSB	NRR/DRA/APLA	NRR/DSS/STSB
NAME	RGrover	HHamzehee,	RElliott
DATE	7/8 /2014	7/21 /2014	7/ 22 /2014

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**REQUEST FOR ADDITIONAL INFORMATION**  
**RIVER BEND STATION, UNIT 1**  
**ENTERGY OPERATIONS, INC**  
**ADOPTION OF TSTF-423, REVISION 1**  
**“CHANGE IN TECHNICAL SPECIFICATIONS END STATES (CE NPSD-1186)”**

By letter dated June 13, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13169A068), Entergy Operations, Inc. (Entergy) (the Licensee) submitted a license amendment request (LAR) which proposed changes to the Technical Specifications (TSs) for River Bend Station, Unit 1 (RBS) nuclear facility. Specifically, the licensee proposed to adopt U.S. Nuclear Regulatory Commission (NRC)-approved Revision 1 to Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) Change traveler TSTF-423, “Technical Specifications End States, NEDC-32988-A,” dated December 22, 2009.

The licensee’s application proposes changes to end-states associated with several of its TS LCOs as listed in the application. While working on the application, the Staff noticed that one of the regulatory guidance documents used in the ~~NRC S~~staff’s regulatory assessment for the TSTF and referenced in the ~~s~~Staff’s model SE for the TSTF, has since been superseded and therefore, is not a valid guidance for the adoption of approved TSTF. The issue concerns specific reference to Regulatory Guide (RG) 1.182, “Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants,” in TSTF-423, Revision 1 (ADAMS Accession No. ML093570241) as well as model Safety Evaluation (ADAMS Accession No. ML102730688) for the TSTF, which currently states,

“Regulatory Guide (RG) 1.182, “Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants” (Reference 5), provides guidance on implementing the provisions of 10 CFR 50.65(a)(4) by endorsing the revised Section 11 (published separately) to NUMARC 93-01, Revision 2. The revised Section 11 of NUMARC 93-01, Revision 2, was subsequently incorporated into Revision 3 of NUMARC 93-01 (Reference 6). However, Revision 3 has not yet been formally endorsed by the NRC. The changes in TSTF-423 are consistent with the rules, regulations, and associated regulatory guidance, as noted above.”

While working on the amendment, the ~~NRC S~~staff ~~identified noticed~~ that RG 1.182 was withdrawn since it was determined that the document (RG 1.182) was redundant due to the inclusion of its subject matter in Revision 3 of RG 1.160, “Monitoring the Effectiveness of Maintenance at Nuclear Power Plants.” Withdrawal of RG 1.182 was published in Federal Register Notice ~~(FRN)~~ 78 FR 70846,

**ENCLOSURE**

dated, November 27, 2012. The ~~FRN~~Notice also states that withdrawal of RG 1.182 neither altered any prior or existing licensing commitments based on its use, nor constituted backfitting as defined in 10 Code of Federal Regulations (CFR) 50.109 (the Backfit Rule) and was not otherwise inconsistent with the issue finality provisions in 10 CFR Part 52.

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In addition, the ~~NRC~~Staff observed that RG 1.160 endorsed Revision 4A of the Nuclear Management and Resources Council (NUMARC) 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." NUMARC 93-01 provides methods that are acceptable to the NRC staff for complying with the provisions of Section 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," of ~~Title 10, of the Code of Federal Regulations, CFR~~ Part 50, "Domestic Licensing of Production and Utilization Facilities" (~~10 CFR Part 50~~) (~~Ref. 2~~). The model SE for the TSTF currently refers to the guidance in Revision 2 of the NUMARC 93-01.

#### Request For Additional Information:

In order to justify adoption of the approved TSTF changes, please confirm that ~~RBS~~iver Bend's current licensing basis adheres to the RG 1.160 guidance and commitment to the updated version of NUMARC 93-01. In addition, confirm that the topical report supporting the TSTF complies with NUMARC 93-01, Section 11, and identify, if any, inconsistencies with this section.

#### Regulatory Basis

~~The regulations under 10 CFR 50.36 (c)(2)(i) state that Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility (emphasis added). When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. The regulations under 10 CFR 50.65(a)(4) requires that before performing maintenance activities (including but not limited to surveillance, post maintenance testing, and corrective and preventive maintenance), the licensee shall assess and manage the increase in risk that may result from the proposed maintenance activities. The scope of the assessment may be limited to structures, systems, and components that a risk informed evaluation process has shown to be significant to public health and safety.~~