

## NRR-PMDAPEm Resource

---

**From:** Wang, Alan  
**Sent:** Wednesday, July 30, 2014 9:28 AM  
**To:** 'SCARBROUGH, RICHARD A (RSCARBR@entergy.com)'  
**Cc:** Burkhardt, Janet  
**Subject:** Grand Gulf Nuclear Station Request for Additional Information Regarding Maximun Extended Load Line Limit Plus Amendment Request (TAC MF2798)

Richard,

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. The US Nuclear Regulatory Commission (NRC) staff has reviewed the September 25, 2013, submittal for the use of MELLLA+ domain and has determined that the following additional information is required to complete its review of the amendment request.

1. Section 10.5.3 of Attachment 4 states "Although there are no new operator actions, the higher core power after a RPT [recirculation pump trip] may reduce operator action timing for ATWS [Anticipated Transient Without Scram] level/power control and potential increased SRV [safety relief valve] cycling." Please explain the changes to the timing of operator response as well as any increase to operator workload as result of the proposed license amendment.
2. Has an operating experience review been performed, including plant-specific condition reports, Licensee Event Reports, INPO reports, and other relevant sources?
3. What has been or will be done to assure ATWS response actions can be performed within the time limits of the relevant analyses? Are any changes necessary to the task analysis to ensure that tasks can be completed as described?
4. Please describe any changes to staffing or qualifications needed to support the proposed license amendment.
5. Section 10.5.3 of Attachment 4 indicates that there are no significant changes to operator actions, however, it also says indicates that certain actions "become more important." In what way are these actions more important and how are they treated differently?
6. What are the performance shaping factors (PSFs) that can affect the performance of ATWS response operator actions? What are the likely errors? Is there sufficient time available for recovery actions after errors?
7. Several sections (such as sections 3.1 and 5.3 of Attachment 4) mention that there are limited effects on controls and instrument setpoints as a result of MELLLA+ operation. What changes to Human-System Interface (HIS) are necessary to support these changes (i.e. changes to ranges, labels on displays, etc.)?
8. Please describe any changes to operating procedures (or alarm procedures) needed to support the proposed license amendment (such as water level control procedures as described in Section 9.3.1.1 of Attachment 4).

9. What validation activities have been done to ensure that operators can complete all of the necessary tasks within the allowable time frames? Has any validation occurred to ensure that the changes to the HSI (power/core flow maps, alarms, instrument setpoints) and procedures are sufficient for task completion?

This RAI was discussed with Mr. Richard Scarbrough on July 29, 2014, 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](mailto:Alan.Wang@nrc.gov).

Alan Wang  
Project Manager (Grand Gulf Nuclear Station)  
Nuclear Regulatory Commission  
Division of Operating Reactor Licensing  
[Alan.Wang@NRC.gov](mailto:Alan.Wang@NRC.gov)  
Tel: (301) 415-1445  
Fax: (301) 415-1222

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 1462

**Mail Envelope Properties** (C0A338EE37A11447B136119705BF9A3F0214F79506C2)

**Subject:** Grand Gulf Nuclear Station Request for Additional Information Regarding  
Maximun Extended Load Line Limit Plus Amendment Request (TAC MF2798)  
**Sent Date:** 7/30/2014 9:27:56 AM  
**Received Date:** 7/30/2014 9:27:00 AM  
**From:** Wang, Alan

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

**Recipients:**  
"Burkhardt, Janet" <Janet.Burkhardt@nrc.gov>  
Tracking Status: None  
"SCARBROUGH, RICHARD A (RSCARBR@entergy.com)" <RSCARBR@entergy.com>  
Tracking Status: None

**Post Office:** HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	3657	7/30/2014 9:27:00 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**