

NRR-PMDAPEm Resource

From: Wang, Alan
Sent: Wednesday, April 01, 2015 10:39 AM
To: 'SCARBROUGH, RICHARD A (RSCARBR@entergy.com)'; 'Nadeau, James'
Cc: Blechman, Paula
Subject: Grand Gulf Nuclear Station, Unit 1, Request for Additional Information (RAI) Regarding Adoption of TSTF-522 License Amendment Request (TAC No. MF5504)

Jeff and Jim, by letter December 15, 2014, (Agencywide Documents Access and Management System (ADAMS) Accession Number ML14351A069), Entergy Operations, Inc. (Entergy, the licensee), submitted a license amendment request ([LAR](#)) for the Grand Gulf Nuclear Station, Unit No. 1 (GGNS). The amendment proposes to adopt Technical Specifications Task Force (TSTF)-522, Revision 0, "Revise Ventilation System Surveillance Requirements (SRs) to operate for 10 hours per month." Specifically, SR 3.6.4.3.1 for the Standby Gas Treatment (SGT) system and SR 3.7.3.1 for the Control Room Fresh Air (CFRA) System will be modified from the current requirement to operate the systems for ≥ 10 continuous hours with the heaters operating to ≥ 15 continuous minutes with heaters operating, with the current frequency of 31 days remaining unchanged. The NRC staff has reviewed the [LAR dated December 15, 2014, regarding the adoption of TSTF-522](#) and has determined that the following additional information is required to complete its review of the amendment request.

RAI - 1

The LAR states that the justifications presented in the TSTF-522 Traveler and the model Safety Evaluation (SE) prepared by the U.S. Nuclear Regulatory Commission (NRC) staff are applicable to Grand Gulf Nuclear Station, Unit 1 (GGNS).

The NRC guidance in the model SE states that at least 15 continuous minutes of ventilation system operation with heaters every 31 days is acceptable for those plants that test ventilation system charcoal adsorption at a relative humidity of less than 95 percent. The model SE also states that plants that test ventilation system absorption at a relative humidity of 95 percent do not require heaters for the ventilation system to perform its specified safety function. Based on the TS Program and Manuals, Section 5.5.7 "Ventilation Filter Testing Program (VFTP), the SGTS is an Engineered Safety Feature (ESF) filter ventilation system and it contains charcoal adsorbers. However, the VFTP and the GGNS Updated Final safety Analysis Report (UFSAR) indicate that there are no charcoal adsorbers in the CRFA. Therefore, it is not clear to the NRC staff the correlation between the LAR for the CRFA and the adoption of TSTF-522 or to the NRC staff's model SE for the TSTF. Please provide the safety basis for the heaters in the CRFA and additional information to support the requested TS change for the CRFA.

RAI - 2

Section 2.2, Optional Changes and Variations, in Attachment 1 to the LAR states the following:

"Entergy is not proposing any variations or deviations from the TS changes described in the in the TSTF-522, Revision 0, or the applicable parts of the NRC staff's model safety evaluation dated September 13, 2012. Entergy is proposing the following variations from the TS changes described in the in the TSTF-522, Revision 0, or the applicable parts of the NRC staff's model safety evaluation dated September 13, 2012."

Please clarify the apparently conflicting statements above and provide any additional information if the second part of the paragraph were to be applicable.

RAI - 3

Attachment 4 to the LAR provides a mark-up of the proposed changes to TS Bases for NRC staff information. The NRC staff suggests that Bases changes related to SR 3.7.3.1 be modified to convey a better understanding of the intended information.

This RAI was discussed with Mr. Richard Scarbrough on [April 1](#), 2015, 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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