Entergy

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Tel 225-381-4157

N. Todd Brumfield
Director – Regulatory & Performance Improvement

RBG-47582

July 16, 2015

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Response to Request for Information - Change to Technical Specification 3.8.1, "AC Sources – Operating"
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

References
1. Entergy letter, Application for Change to Technical Specification 3.8.1, "AC Sources – Operating" dated July 9, 2014 (RBG-47461)
2. NRC email, River Bend Station Unit 1 License Amendment Request for Change to Technical Specifications 3.8.1, "AC Sources - Operating" (MF4421) dated January 20, 2015
3. Entergy letter, Response to Request for Information - Change to Technical Specification 3.8.1, "AC Sources — Operating" dated May 7, 2015
4. NRC email, River Bend Station Unit 1 License Amendment Request for Change to Technical Specifications 3.8.1, "AC Sources - Operating" (MF4421) dated May 04, 2015
5. Entergy letter, Response to Request for Information - Change to Technical Specification 3.8.1, "AC Sources — Operating" dated June 3, 2015

Dear Sir or Madam:

In Reference 1 Entergy submitted a request for an amendment to the Technical Specifications (TS) for River Bend Station (RBS), Unit 1, modifying the existing Surveillance Requirements (SRs) related to Technical Specification 3.8.1, "AC Sources – Operating." References 3 and 5, are responses to NRC Staff requested additional information.

During the review an editorial changes to the numbering of the revised TS SRs was identified. The changes are for clarity and have no technical effect. The changes are identified in the attachment.

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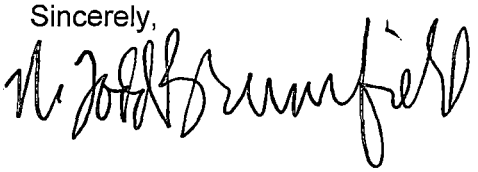
The changes were discussed with the NRC Project Manager. These changes are in the Attachment.

There are not new commitments in this letter. Please contact Mr. J. A. Clark at (225) 381-4177, if you have any questions.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 16, 2015.

Sincerely,



NTB/JAC/bmb

Attachment: Revised Surveillance Requirement Numbering

cc: Regional Administrator
U. S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Blvd.
Arlington, TX 76011-4511

NRC Senior Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

U. S. Nuclear Regulatory Commission
Attn: Mr. Alan Wang
MS O-8B1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Department of Environmental Quality
Office of Environmental Compliance
Radiological Emergency Planning and Response Section
Ji Young Wiley
P.O. Box 4312
Baton Rouge, LA 70821-4312

Public Utility Commission of Texas
Attn: PUC Filing Clerk
1701 N. Congress Avenue
P. O. Box 13326
Austin, TX 78711-3326

RBF1-15-0101
LAR 2014-02

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | FREQUENCY |
|---|---|
| SR 3.8.1.11 ----------NOTES----------<br>1. All DG starts may be preceded by an engine prelube period.<br>2. This Surveillance shall not be performed in MODE 1, 2, or 3. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR.<br>----------<br>Verify on an actual or simulated loss of offsite power signal:<br>a. De-energization of emergency buses;<br>b. Load shedding from emergency buses for Divisions I and II; and<br>c. DG auto-starts from standby condition and:<br>1. energizes permanently connected loads in ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C,<br>2. energizes auto-connected shutdown loads,<br>3. maintains steady state voltage<br>i. for DG 1A and DG 1B ≥ 3740 V and ≤ 4368 V,<br>ii. for DG 1C ≥ 3740 V and ≤ 4580 V<br>4. maintains steady state frequency ≥ 58.8 Hz and ≤ 60.2 Hz, and<br>5. supplies permanently connected and auto-connected shutdown loads for ≥ 5 minutes. | 24 months |

(continued)

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | FREQUENCY |
|---|---|
| SR 3.8.1.12 ----------NOTES----------<br>1. All DG starts may be preceded by an engine prelube period.<br>2. This Surveillance shall not be performed in MODE 1 or 2. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR.<br>----------<br>Verify on an actual or simulated Emergency Core Cooling System (ECCS) initiation signal each DG auto-starts from standby condition and:<br>a. For DG 1C during the auto-start maintains voltage ≤ 5400 V and frequency ≤ 66.75 Hz;<br>b. In ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C after auto-start and during tests, achieves voltage ≥ 3740 V and frequency ≥ 58.8 Hz.<br>c. Achieves steady state voltage<br>1. For DG 1A and DG 1B ≥ 3740 V and ≤ 4368 V,<br>2. For DG 1C ≥ 3740 V and ≤ 4580 V, and<br>3. For DG 1A, 1B, and 1C, frequency of ≥ 58.8 and ≤ 60.2 Hz; and<br>d. Operates for ≥ 5 minutes. | 24 months |

(continued)

**Attachment 1**

**RBG-47582**

**Revised Surveillance Requirement Numbering**

| Specification | Page | Note/Change |
|---|---|---|
| SR 3.8.1.11 | 3.8-9 | Subsection lettering/numbering |
| SR 3.8.1.12 | 3.8-10 | Subsection lettering/numbering |
| SR 3.8.1.15 | 3.8-12 | Subsection lettering/numbering |
| SR 3.8.1.15 | 3.8-13 | Relocation of SR 3.8.1.16 (no change to SR) |
| SR 3.8.1.19 | 3.8-14 | Subsection lettering/numbering |
| SR 3.8.1.20 | 3.8-15 | Subsection lettering/numbering |

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | | FREQUENCY |
|---|---|---|
| SR 3.8.1.13 | ----------NOTE----------<br>This Surveillance shall not be performed in MODE 1, 2, or 3. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR.<br>---<br>Verify each DG's automatic trips are bypassed on an actual or simulated ECCS initiation signal except:<br>a. Engine overspeed; and<br>b. Generator differential current. | 24 months |
| SR 3.8.1.14 | ----------NOTES----------<br>1. Momentary transients outside the load and power factor ranges do not invalidate this test.<br>2. Credit may be taken for unplanned events that satisfy this SR.<br>---<br>Verify each DG operating at a power factor $\leq$ 0.9, operates for $\geq$ 24 hours:<br>a. For DG 1A and DG 1B loaded $\geq$ 3050 kW and $\leq$ 3130 kW; and<br>b. For DG 1C:<br>1. For $\geq$ 2 hours loaded $\geq$ 2750 kW and $\leq$ 2850 kW, and<br>2. For the remaining hours of the test loaded $\geq$ 2525 kW and $\leq$ 2600 kW. | 24 months |

(continued)

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | FREQUENCY |
|---|---|
| SR 3.8.1.15 ----------NOTES----------<br>1. This Surveillance shall be performed within 5 minutes of shutting down the DG after the DG has operated ≥ 1 hour loaded ≥ 3050 kW and ≤ 3100 kW for DG 1A and DG 1B, and ≥ 2525 kW and ≤ 2600 for DG 1C, or operating temperatures have stabilized, which ever is longer.<br><br>Momentary transients outside of the load range do not invalidate this test.<br><br>2. All DG starts may be preceded by an engine prelube period.<br>----------<br><br>Verify each DG starts and achieves:<br><br>1. In ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C voltage ≥ 3740 V and frequency ≥ 58.8 Hz, and<br><br>2. Steady state voltage<br>a) For DG 1A and DG 1B ≥ 3740 V and ≤ 4368 V<br>b) For DG 1C ≥ 3740 V and ≤ 4580 V and<br>c) For DG 1A, 1B, and 1C frequency ≥ 58.8 Hz and ≤ 60.2 Hz. | 24 months |

(continued)

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | | FREQUENCY |
|---|---|---|
| SR 3.8.1.16 | ----------NOTE----------<br>This Surveillance shall not be performed in MODE 1, 2, or 3. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR.<br>----------<br>Verify each DG:<br>a. Synchronizes with offsite power source while loaded with emergency loads upon a simulated restoration of offsite power;<br>b. Transfers loads to offsite power source; and<br>c. Returns to ready-to-load operation. | 24 months |
| SR 3.8.1.17 | ----------NOTE----------<br>This Surveillance shall not be performed in MODE 1, 2, or 3. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR.<br>----------<br>Verify, with a DG operating in test mode and connected to its bus, an actual or simulated ECCS initiation signal overrides the test mode by:<br>a. Returning DG to ready-to-load operation; and<br>b. Automatically energizing the emergency loads from offsite power. | 24 months |
| SR 3.8.1.18 | ----------NOTE----------<br>This Surveillance shall not be performed in MODE 1, 2, or 3. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR.<br>----------<br>Verify sequence time is within ± 10% of design for each load sequencer timer. | 24 months |

(continued)

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | | FREQUENCY |
|---|---|---|
| SR 3.8.1.19 | ----------NOTES----------<br>1. All DG starts may be preceded by an engine prelube period.<br>2. This Surveillance shall not be performed in MODE 1, 2, or 3. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR.<br>----------<br>Verify, on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated ECCS initiation signal:<br>a. De-energization of emergency buses;<br>b. Load shedding from emergency buses for Divisions I and II; and<br>c. DG auto-starts from standby condition and:<br>1. energizes permanently connected loads in ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C,<br>2. energizes auto-connected emergency loads,<br>3. achieves steady state voltage<br>i. for DG 1A and DG 1B ≥ 3740 V and ≤ 4368 V,<br>ii. for DG 1C ≥ 3740 V and ≤ 4580 V,<br>4. achieves steady state frequency ≥ 58.8 Hz and ≤ 60.2 Hz, and<br>5. supplies permanently connected and auto-connected emergency loads for ≥ 5 minutes. | 24 months |

(continued)

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | | FREQUENCY |
|---|---|---|
| SR 3.8.1.20 | ----------NOTE----------<br>All DG starts may be preceded by an engine prelube period.<br>---<br><br>Verify, when started simultaneously from standby condition, each DG achieves:<br><br>1. In ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C voltage ≥ 3740 V and frequency ≥ 58.8 Hz, and<br><br>2. Steady state voltage<br>a) For DG 1A and DG 1B ≥ 3740 V and ≤ 4368 V,<br>b) For DG 1C ≥ 3740 V and ≤ 4580 V, and<br>c) For DG 1A, 1B, and 1C frequency ≥ 58.8 Hz and ≤ 60.2 Hz. | 10 years |