

Entergy.

Entergy Operations, Inc.
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Tel 225-231-4374

William F. Maguire
SVP Vice President

RBG-47675

April 19, 2016

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

**SUBJECT: Response to NRC Request for Additional Information - RBS LAR to
Extend Type A and Type C Test Frequencies
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47**

**Reference 1.) Entergy Letter; License Amendment Request for change to Technical
Specification; 5.5.13, to be extended to 15 years, Drywell Bypass Test
Frequency to 15 Years and Type C Test Frequency to 75 Months (RBG-
47620) Dated October 29, 2015**

**2.) NRC email; River Bend Station, Unit 1, Request for Additional
Information - RBS LAR to Extend Type A and Type C Test Frequencies (NEI
94-01, Rev. 3-A) - TAC No. MF7037, Dated March 21, 2016**

Dear Sir or Madam:

**In Reference 1 Entergy Operations, Inc. (Entergy) submitted a request for an amendment
to the Technical Specifications (TS) for River Bend Station (RBS), Unit 1. The proposed
amendment modifies the existing requirements related to containment leak rate testing.**

**In Reference 2 the NRC Staff requested additional information (RAI) in support of this
request.**


**Attachment 1 provides responses to the RAI with Attachment 2 providing revised TS
pages. Attachment 3 includes regulatory commitments to be implemented in support of
this change.**

*A001
NRR*

If you have any questions or require additional information, please contact Mr. J. A. Clark at (225) 381-4177.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 19, 2016.

Sincerely,



WFM/JAC/bms

Attachments:

1. Response to Request for Information
2. Proposed Technical Specification Changes (mark-up)
3. List of Regulatory Commitments

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: Ms. Andrea George
MS 8 B1A
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

RBG-47675

Page 3 of 3

**Department of Environmental Quality
Office of Environmental Compliance
Radiological Emergency Planning and Response Section
Jl 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**

RBF1-16-0042

LAR 2014-04

Attachment 1

HBG-47673

Response to Request for Information

By application dated October 29, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15307A293), Entergy Operations, Inc. (Entergy, the licensee), submitted a license amendment request (LAR) for River Bend Station, Unit 1 (RBS). The LAR would revise Technical Specification (TS) 5.5.13, "Primary Containment Leakage Rate Testing Program," to incorporate Nuclear Energy Institute (NEI) topical report 94-01, Revision 3-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," which would allow for the extension of the Type A Test (Integrated Leak Rate Test, or ILRT) and Type C Test (Local Leak Rate Test) frequencies from 10 to 15 years and 60 to 75 months, respectively. Surveillance Requirement (SR) 3.6.5.1.3, would also be revised to extend the maximum interval for performing the Drywell Bypass Test from 10 to 15 years in order to remain consistent with the proposed extended Type A Test frequency provided for in NEI 94-01 Revision 3-A.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is required in order to complete its review of the LAR.

SCVB RAI-1

In Attachment 1, Section 2 of its LAR, the licensee states that the purpose of the proposed change is to allow for the extension of the Type A Test (ILRT) frequency from 10 to 15 years. The proposed new TS 5.5.13 reads:

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with NEI 94-01, Revision 3-A, "Industry Guidelines for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," July 2012.

NEI 94-01, Revision 2-A (ADAMS Accession No. ML100620847), incorporated the NRC staff's corresponding Safety Evaluation Report (SER), which included a list of limitations and conditions to be satisfied by licensees proposing to use that topical report to extend the ILRT frequency. The subsequent revision of the topical report, NEI 94-01, Revision 3-A, referred to the previous Revision 2-A in a historical discussion context, but did not incorporate the limitations and conditions listed in the NRC SER for Revision 2-A. In a letter dated August 20, 2013 (ADAMS Accession No. ML13192A394), the NRC staff informed NEI that any licensee submissions referencing NEI 94-01, Revision 3-A will require requests for additional information to address the limitations and conditions in the NRC SER for NEI 94-01, Revision 2-A. In other words, a reference to NEI 94-01, Revision 3-A by itself would not be a sufficient TS reference to a guidance document by for allowing an extension to the Type A Test frequency to 15 years.

Please describe how, without referencing the limitations and conditions from NEI 94-01 Revision 2-A in the TS, a reference to NEI 94-01, Revision 3-A, would be sufficient to support the extension of the Type A test frequency.

Response

Attachment 1, Table 4.0 – 1 of the submittal, addressed the conditions and limitations in NEI 94-01 Revision 2-A, Section 4.1. To address the concern that these conditions and

limitations would be maintained, Entergy proposes the addition of specific reference to NEI 94-01 Revision 2-A Section 4.1 as described below.

Proposed revision;

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in NEI 94-01, "Industry Guideline for Implementing Performance Based Option of 10 CFR Part 50, Appendix J," Revision 3-A, dated July 2012, and the conditions and limitations specified in NEI 94-01, Revision 2-A, Section 4.1, dated October 2008.

SCVB RAI-2

In its LAR, the licensee proposes to revise the Note in SR 3.6.5.1.3 to state that "SR 3.0.2 is not applicable for extensions > 9 months." In its LAR, the licensee states that the request to extend the Drywell Bypass Test frequency from 10 to 15 years is in large part to align it with performance of the ILRT (i.e., perform both tests in the same refueling outage) in order to reduce costs and radiological dose. The risk evaluation provided in the LAR assumes both the Drywell Bypass Test and the ILRT are performed on a 15 year interval, further indicating that both tests would be performed during the same timeframe. The NEI 94-01, Revision 2-A, NRC staff SER limitations and conditions include a provision that the 15-year Type A Test interval only be exceeded upon demonstration to the NRC staff that exceeding the 15 year interval is due to an unforeseen emergent condition.

Please provide justification as to why SR 3.6.5.1.3 retains an extension option for the proposed 180-month Drywell Bypass Test frequency, which is not subject to the same condition as that of the corresponding ILRT frequency, as discussed above.

Response

Attachment 1, Section 4 of the submittal discusses the proposed revision of the Drywell Bypass test (DWBT) frequency to align with the proposed ILRT frequency. To address the concern that extensions could be used for operational convenience Entergy proposes that additional discussion be added to the BASES as described below.

The following will be added to the BASES of SR 3.6.5.1.3;

The provision to extend this interval is not intended to be used as an operational convenience. Extensions are subject to the same condition as that of the corresponding ILRT frequency.

Attachment 2

REG-47675

Proposed Technical Specification Changes (mark-up)

5.5 Programs and Manuals

5.5.11 Technical Specifications (TS) Bases Control Program (continued)

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the USAR.
- d. Proposed changes that do not meet the criteria of either Specification 5.5.11.b.1 or Specification 5.5.11.b.2 above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

5.5.12 DELETED

5.5.13 Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, except that the next Type A test performed after the August 15, 1992, Type A test shall be performed no later than April 14, 2008. NEI 94-01, "Industry Guideline for Implementing Performance Based Option of 10 CFR Part 50, Appendix J," Revision 3-A, dated July 2012, and the conditions and limitations specified in NEI 94-01, Revision 2-A, Section 4.1, dated October 2008.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 7.6 psig.

The maximum allowable primary containment leakage rate, L_a , at P_a , shall be 0.325% of primary containment air weight per day.

The Primary Containment leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the Type B and Type C tests and $\leq 0.75 L_a$ for Type A tests.

The provisions of SR 3.0.2 do not apply to test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

5.5.14 Control Room Envelope Habitability Program

Attachment 3

RBG-47675

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
<p>The following will be added to the BASES of SR 3.6.5.1.3;</p> <p>The provision to extend this interval is not intended to be used as an operational convenience. Extensions are subject to the same condition as that of the corresponding ILRT frequency.</p>	X		Upon Implementation