



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 635-6094 340-8551

June 22, 1990
RBG-33100
File No. G9.5

Mr. Bruce A. Boger
Acting Assistant Director, Regions IV and V
Division of Reactor Projects - III/IV/V and Special Projects
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Boger:

River Bend Station - Unit 1
Docket No. 50-458

This letter requests an NRR waiver of compliance of River Bend Station Technical Specification requirement 3/4.6.3.1 until the exigent processing of our technical specification change request IAR 90-08 transmitted May 14, 1990, can be completed. That application was filed to revise the maximum temperature for the suppression pool temperature from 95°F to 100°F. This change was necessary to avoid limiting plant operation or plant shutdown due to peak summer temperatures expected in July and August.

The Baton Rouge area has been experiencing unseasonably high record temperatures for the last three weeks (e.g. 95° - 100°F ambient) with no relief forecast. System electrical demand is also high due to the weather. Loss of this generating unit would impact GSU's ability to service its customer demand.

During June, GSU has been able to maintain suppression pool temperatures below the 95°F technical specification by utilizing the service water system. When the service water temperature approached 95°F, use of the ultimate heat sink (standby) cooling tower became necessary. This has raised the standby cooling tower basin temperature near its limit. As a compensatory measure GSU is working expeditiously to install a temporary modification per 10CFR50.59, to provide auxiliary cooling for the standby cooling tower basin water inventory to alleviate this condition. Predicted suppression pool temperature rises due to weeping safety relief valves necessitate that GSU request this waiver of compliance. With an increased suppression pool limit to 100°F, GSU anticipates the normal service water system will be able to accommodate the suppression pool temperatures given prevailing service water temperatures.

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As discussed fully in the requested technical specification change, LAR 90-08, GSU has determined the change to increase the suppression pool temperature limit from 95 F to 100 F may be implemented without adversely affecting safety. GSU is in the process of completing a submittal to provide the additional information requested by the NRC in a letter dated June 11, 1990, concerning this technical specification change. Some of this additional information was verbally provided on June 21, 1990. GSU has determined that this additional information does not change the 10CFR50.92, "no significant hazards consideration" determination provided in the original change request:

- I The change does not involve a significant increase in the probability or consequences of an accident. All design basis events utilizing an initial suppression pool temperature of at least 100 F, yield peak temperatures and pressures that are bounded by the design limits.
- II The possibility of a different kind of accident from any analyzed previously is not created because plant design and function are unchanged.
- III Margins of safety are not reduced by this change since all analysis yielded results that are bounded by the design limits.

Similarly, the additional information to be provided does not change the environmental impact appraisal provided in the May 14, 1990 submittal. Our conclusion remains that the proposed change meets the criteria given in 10CFR51.22(c)(a) for a categorical exclusion from the requirement for a Environmental Impact Statement.

GSU requests this waiver of compliance be granted as soon as possible. This request has been reviewed and approved by the RBS Facility Review Committee. If additional information is required or you have any questions, please call Mr. L. A. England at (504) 381-4145.

Sincerely,

L. A. England
for W. H. Odell
Manager-Oversight
River Bend Nuclear Group

MS
W. H. Odell
TFP/LAE/GAB/JSM/LLD/pg

cc: U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Mr. Chris Grimes
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Ms. Claudia Abbate
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Resident Inspector
Post Office Box 1051
St. Francisville, LA 70775

Mr. William H. Spell, Administrator
Nuclear Energy Division
Louisiana Dept. of Environmental Quality
P. O. Box 14690
Baton Rouge, LA 70898