



ENTERGY

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Vice President  
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Grand Gulf Nuclear Station

July 15, 1993

U.S. Nuclear Regulatory Commission  
Mail Station P1-37  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
Load Shedding and Sequencing System Technical  
Specification Changes  
Proposed Amendment to the Operating License  
(PCOL-93/04, Revision 1)

GNRO-93/00092

Gentlemen:

Entergy Operations, Inc. is submitting by this letter a revision to the proposed amendment to the Grand Gulf Nuclear Station (GGNS) Operating License initially submitted on May 20, 1993 (GNRO-93/00058). This application requests changes to the Onsite Power Distribution Systems - Distribution, for both the Operating and Shutdown Technical Specifications (TS). The proposed changes remove operability requirements for the auto-test feature of the Load Shedding and Sequencing (LSS) System and increase the allowed outage time (AOT) for an inoperable LSS system from eight to 12 hours. These changes are consistent with the requirements stipulated in the Improved Standard Technical Specifications, NUREG 1434, Revision 0.

This revised application is based on our telephone conversation with the Staff on July 15, 1993 and involves reducing the allowed out of service time (AOT) for the LSS system from 24 hours, as requested in our initial request, to 12 hours. Although the Staff believes that the appropriate AOT is 12 hours based on the Improved Standard Tech Specs, we continue to disagree on the basis for the AOT. We believe that the nature of the disagreement lies in the misapplication of the regulatory position for the AOTs for a loss of one or

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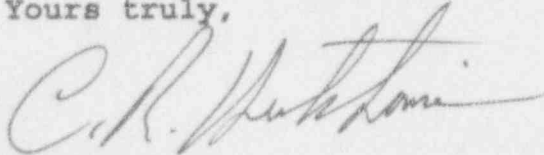
more AC sources specified in Regulatory Guide 1.93 to the loss of sequencing capability associated with the loss of a single LSS panel. We believe that the application of the Regulatory Guide 1.93 position is not appropriate given the continued availability of offsite source and the ability to manually start the on-site source and sequence the loads with the LSS panel out of service. However, we are revising our request in order to expedite the issuance of the amendment and will pursue a revision to the Improved Standard Tech Spec through the BWR Owners Group Tech Spec Committee as a generic change.

Attachment 2 provides a detailed description of the proposed changes, justification, and the No Significant Hazards Considerations. Attachment 3 is a copy of the marked-up TS and TS bases pages, and Attachment 4 is an information copy of the proposed TS.

In accordance with the provisions of 10CFR50.4, the signed original of the requested amendment is enclosed. This amendment request has been reviewed and accepted by the Plant Safety Review Committee. The initial application was reviewed and approved by the Safety Review Committee.

Based on the guidelines in 10CFR50.92, Entergy Operations has concluded that this proposed amendment involves no significant hazards considerations. Attachment 2 details the basis for this determination.

Yours truly,



CRH/WEL/ams

attachments: 1. Affirmation per 10CFR50.30  
2. GGNS PCOL-93/04, Revision 1  
3. Mark-up of Affected Technical Specification Pages  
4. Proposed Technical Specifications Pages - Information Only

cc: (See Next Page)

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cc:

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