



**Entergy
Operations**

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Vice President

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Grand Gulf Nuclear Station

April 10, 1991

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Implementation of Generic Letter 90-09 Recommendations
Regarding Snubber Inspection; Proposed Change to the
Operating License (PCOL-91/10, Revision 0)

GNRO-91/00060

Gentlemen:

Entergy Operations, Inc. is by this letter submitting a proposed change to the Grand Gulf Nuclear Station (GGNS) Operating License. The change will modify Technical Specification 4.7.4 and the bases related to snubber visual surveillance requirements and references to common hydraulic fluid reservoirs.

The change is in accordance with the NRC guidance and recommendations in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions". Entergy Operations concurs with the NRC Staff evaluation in the Generic Letter that this change will maintain the same confidence level in snubber reliability as the present requirements while avoiding a significant expenditure of manpower and radiation exposure.

The change also eliminates reference to common hydraulic fluid reservoirs since there are no GGNS snubbers which utilize common reservoirs.

In accordance with the provisions of 10CFR50.4 the original of the requested amendment is attached. The attached NL-91/09 provides the technical justification and discussion to support the requested amendment. This request for amendment has been reviewed and accepted by the GGNS Plant Safety Review Committee and the Safety Review Committee. Based on the guidelines present in 10CFR50.92, Entergy Operations has concluded that this proposed amendment involves no significant hazards.

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The proposed changes to the Technical Specifications are consistent with and conform to the guidance in Generic Letter 90-09. Because the proposed change will result in no snubber inspections in the upcoming refueling outage and a corresponding reduction in personnel exposure, we have discontinued planning for such inspections. Therefore, to ensure no adverse impact on the refueling outage, Entergy Operations is requesting expeditious review by the GGNS NRC Project Manager on this submittal, in accordance with Generic Letter 90-09, and approval of the proposed change by July 15, 1991.

If you have any questions or desire additional information, please advise.

Yours truly,

WTC/HEK

WTC/HEK/mtc

attachment:

cc:

Mr. D. C. Hintz (w/a)
Mr. J. Mathis (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)
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Mr. L. L. Kintner, Project Manager (w/a)
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U.S. Nuclear Regulatory Commission
Mail Stop 11D21
Washington, D.C. 20555

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

LICENSE NO. NPF-29

DOCKET NO. 50-416

IN THE MATTER OF
MISSISSIPPI POWER & LIGHT COMPANY
and
SYSTEM ENERGY RESOURCES, INC.
and
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION
and
ENTERGY OPERATIONS, INC.

AFFIRMATION

I, W. T. Cottle, being duly sworn, state that I am Vice President, Operations GGNS of Entergy Operations, Inc.; that on behalf of Entergy Operations, Inc., System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by Entergy Operations, Inc. to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Vice President, Operations GGNS of Entergy Operations, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

W. T. Cottle

W. T. Cottle

STATE OF MISSISSIPPI
COUNTY OF CLAIBORNE

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 10 day of April, 1991.

(SEAL)

Patricia McLaughlin
Notary Public

My commission expires:

My Commission Expires July 1, 1993

NL-91/09 Implementation of Generic Letter 90-09 Recommendations
Regarding Snubber Inspection

I. SUBJECT

Facility Operating License No. NPF-29; Technical Specification
4.7.4 and Bases 3/4.7.4.

II. DISCUSSION

Current Grand Gulf Nuclear Station (GGNS) snubber visual inspection requirements are based on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population inspected. These requirements are excessively restrictive due to the large numbers of snubbers installed in GGNS.

The NRC Staff has developed new guidance on this topic in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions". The Generic Letter recommends an inspection schedule based on the number of unacceptable snubbers found during the previous inspection in proportion to the size of snubber population or categories. Entergy Operations has reviewed Generic Letter 90-09 for applicability to GGNS and concurs with the NRC Staff's evaluation that the recommended changes in the Generic Letter will maintain the same level of confidence in snubber operability as current snubber acceptance limits.

This GGNS change incorporates the NRC guidance and recommendations of Generic Letter 90-09 into the Technical Specifications and bases. While maintaining the existing level of confidence in snubber operability, these new requirements will result in a significant reduction in manpower resources and radiological exposure from those required to meet the current requirements. Although Generic Letter 90-09 did not specifically address bases, appropriate information for the GGNS bases directly from the Generic Letter has been included in the proposed change for consistency and completeness.

This change will also delete reference to snubber common hydraulic fluid reservoirs since no GGNS snubbers utilize common reservoirs.

III. JUSTIFICATION

As discussed above and in Generic Letter 90-09, the current snubber inspection requirements do not include consideration of the snubber population size. The proposed new requirements (and bases) for GGNS, as recommended in Generic Letter 90-09, are based on the number of unacceptable snubbers found during the previous inspection in proportion to the size of the snubber population or categories. These new requirements provide the same level of confidence in snubber operability as the previous requirements, while allowing a significant reduction in manpower resources and radiological exposure from those required to meet the current requirements.

GGNS has no snubbers which utilize common hydraulic reservoirs. Deleting reference to this type of reservoir will therefore clarify the Technical Specifications.

I. SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed change would incorporate the NRC Staff recommendations of Generic Letter 90-09 regarding snubber visual inspections into GGNS Technical Specification 4.7.4 and the bases, and remove reference to snubber common hydraulic reservoirs since no GGNS snubbers utilize a common reservoir.

In accordance with the requirements of 10CFR50.92, the following discussion is provided in support of the determination that no significant hazards are created or increased by the changes proposed in this amendment request. Our conclusions are consistent with those of the NRC Staff in Generic Letter 90-09.

1. No significant increase in the probability or the consequences of an accident previously evaluated results from this proposed change because:

The changes incorporate the guidance and recommendations of Generic Letter 90-09 into the GGNS snubber inspection program. Entergy Operations concurs with the NRC Staff evaluation in the Generic Letter that changes consistent with the Generic Letter recommendations maintain the same confidence level in the operability of snubbers. Therefore, since this confidence level is unchanged, there is no significant increase in the probability or the consequences of an accident previously evaluated.

Deleting reference to a snubber feature (common hydraulic reservoirs) which is not present on any GGNS snubber, is an administrative change which will result in no significant increase in the probability or consequences of an accident previously evaluated.

2. This proposed change will not create the possibility of a new or different kind of accident than any previously evaluated because:

No physical changes or new modes of operation in any plant equipment are to be made by this proposed change; only the snubber inspection program will be changed and reference to a snubber feature not used at GGNS (common hydraulic reservoirs) is deleted. Therefore, the possibility of a new or different kind of accident than any previously evaluated is not created.

3. This proposed change does not involve a significant reduction in the margin of safety because:

The level of confidence in the operability (i.e., reliability) of GGNS snubbers is not affected by this proposed change, as evaluated by the NRC Staff in Generic Letter 90-09. No other impact on the margin of safety is possible due to the nature of this change. Therefore, there is no significant reduction in the margin of safety.

V. REFERENCES

1. Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions".
2. GGNS Technical Specification 4.7.4 and Bases 3/4.7.4.