

PROPOSED CHANGE TO THE
OPERATING LICENSE

REVISIONS TO
TS 4.7.4.e, 6.7.1.c, 6.9.1, 6.9.1.10 & 6.9.2

(GGNS PCOL-91/07)

A. SUBJECT

1. NL-91/06 Compliance with Reporting Requirements
2. Affected Technical Specifications:
 - a. 4.7.4.e - Page 3/4 7-11
 - b. 6.7.1.c - Page 6-14
 - c. 6.9.1 - Page 6-15
 - d. 6.9.1.10 - Page 6-19
 - e. 6.9.2 - Page 6-19

B. DISCUSSION

Entergy Operations, Inc. is requesting revision to the Grand Gulf Nuclear Station (GGNS) Technical Specifications to remove recognized inconsistencies between the GGNS Technical Specifications (TS) and Section 50.4 of 10 CFR 50. The inconsistency was brought about by a revision to Section 50.4 which superseded the requirements contained in the GGNS TS. The specific requirements by the Commission were contained in Federal Register 51FR40303 and focused on reporting requirements.

The proposed amendment specifies that submittal of reports required by GGNS Technical Specifications 4.7.4.e, 6.7.1.c, 6.9.1, and 6.9.2 shall be made pursuant to Section 50.4 of 10 CFR 50. The addressee presently specified in 6.9.1.10 has been deleted to complement the proposed change to 6.9.1.

C. JUSTIFICATION

The details as published in 51FR40303 require that written communications to the Commission pursuant to requirements of 10 CFR 50 be submitted in accordance with Section 50.4. This requirement was stated to supersede all existing requirements in any license conditions or technical specifications in effect on January 5, 1987. The proposed amendment has changed the former submittal requirements to specify that these written communications be submitted in accordance with Section 50.4. This change will remove the recognized inconsistency between GGNS TS and 10 CFR 50.4. Furthermore, specifying the submittal requirement in this manner will preempt future amendment proposals necessary as a consequence of changes to 10 CFR 50.4.

D. SIGNIFICANT HAZARDS CONSIDERATION

1. Entergy Operation, Inc. is proposing amendment to GGNS Technical Specifications in order to comply with reporting requirements of Section 50.4 of 10 CFR 50 as detailed in 51FR40303.

2. The Commission has provided standards for determining whether a no significant hazards consideration exists as stated in 10 CFR 50.92(c). A proposed amendment to an operating license involves no significant hazards if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

3. GGNS has evaluated the no significant hazards considerations in its request for a license amendment. In accordance with 10 CFR 50.91(a), GGNS is providing the following analysis of the proposed amendment against the three standards in 10 CFR 50.92:

- a. No significant increase in the probability or consequences of an accident previously evaluated results from this change.

The proposed changes are purely administrative in that they remove an administrative inconsistency between GGNS TS and 10 CFR 50.4 where the Commission has clearly stated that Section 50.4 takes precedent over existing technical specifications. Therefore, the proposed change cannot increase the probability or consequences of an accident previously evaluated.

- b. This change would not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes are editorial in nature and have no impact on plant equipment or operation other than reporting certain events to the Commission. Therefore, the requested revisions will not create the possibility of a new or different accident from any previously analyzed.

- c. This change would not involve a significant reduction in the margin of safety.

The margin of safety is not reduced since the proposed changes are administrative in nature and do not impact plant equipment. No change to plant equipment will occur due to this proposal. These changes are being proposed to comply with the requirements of Section 50.4 of 10 CFR 50.

4. Based on the above evaluation, Entergy Operations, Inc. has concluded that operation in accordance with the proposed amendment involves no significant hazards considerations.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

e. Functional Tests

A written report of the sample plan selected shall be submitted pursuant to Section 50.4 of 10 CFR 50.

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans for each type of snubber. The sample plan shall be selected prior to the test period and cannot be changed during the test period. ~~The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:~~

- 1) At least 10% of the total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.4.f, an additional 5% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or
- 2) A representative sample of each type of snubber shall be functionally tested in accordance with Figure 4.7.4-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.4.f. The cumulative number of snubbers of a type tested is denoted by "N". At the end of each day's testing, the new values of "N" and "C" (previous day's total plus current day's increments) shall be plotted on Figure 4.7.4-1. If at any time the point plotted falls in the "Accept" region, testing of snubbers of that type may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers of that type shall be tested until the point falls in the "Accept" region or all the snubbers of that type have been tested.

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

pursuant to Section 50.4 of 10 CFR 150

- c. The Safety Limit Violation Report shall be submitted to the Commission, the SRC and the Vice President, Operations GGNS within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 4.15, February 1979.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed as required by 6.5, above, prior to implementation and shall be reviewed periodically as set forth in administrative procedures.

6.8.3 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the:

1. RCIC system outside containment containing steam or water, except the drain line to the main condenser.
2. RHR system outside containment containing steam or water, except the line to the LRW system and headers that are isolated by manual valves.
3. HPCS system.
4. LPCS system.
5. Hydrogen analyzers of the combustible gas control system.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

6. Feedwater leakage control system.
7. Post-accident sampling system.
8. Suppression pool level detection portion of the suppression pool makeup system.

The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

1. Training of personnel,
2. Procedures for sampling and analysis,
3. Provisions for maintenance of sampling and analysis equipment.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted ~~to the Regional Administrator of the Regional Office, unless otherwise noted.~~

STARTUP REPORTS

pursuant to Section 50.4 of 10 CFR 50

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

ADMINISTRATIVE CONTROLS

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT (Continued)

- c. Principal radionuclide (specify whether determined by measurement or estimate),
- d. Type of waste (e.g., spent resin, compact dry waste, evaporator bottoms),
- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent (e.g., cement, urea formaldehyde).

The radioactive effluent release reports shall include unplanned releases from the site to the UNRESTRICTED AREA of radioactive materials in gaseous and liquid effluents on a quarterly basis.

The radioactive effluent release reports shall include any changes to the PROCESS CONTROL PROGRAM (PCP), OFFSITE DOSE CALCULATION MANUAL (ODCM) or radioactive waste systems made during the reporting period.

MONTHLY OPERATING REPORTS

6.9.1.10 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to main steam system safety/relief valves, shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office no later than the 15th of each month following the calendar month covered by the report.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted ^{pursuant to Section 50.4 of 10 CFR 50} to the Regional Administrator of the Regional Office within the time period specified for each report.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS.