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May 30, 1995

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Subject: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
License Amendment Request (LAR) 95-06, Change to Technical Specification 3/4.6.2.2, "Drywell Bypass Leakage"

File Nos.: G9.5, G9.42

RBEXEC-95-077
RBF1-95-0124
RBG-41525

Gentlemen:

In accordance with 10CFR50.90, Entergy Operations, Inc. (EOI) hereby applies for amendment of Facility Operating License No. NPF-47, Appendix A - Technical Specifications, for River Bend Station (RBS). This request consists of a proposed change to Technical Specification 3/4.6.2.2, "Drywell Bypass Leakage," to allow Drywell Bypass Leakage Rate Tests (DBLRTs) to be performed at intervals as long as five years based upon the demonstrated performance of the drywell structure. In the event of a DBLRT failure, the frequency would be required to be increased to at least once per 36 months. If the subsequent DBLRT meets the limit, the five year schedule may be resumed. In the event of two consecutive DBLRT failures, the frequency would be required to be increased to at least once per 18 months until two consecutive DBLRTs meet the limit, at which time the five year schedule may be resumed.

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The subject request is being submitted as part of the cost beneficial licensing action (CBLA) program established within NRR where increased priority is granted to qualifying licensee requests. Although the proposed change does have safety benefit (e.g., occupational dose reduction due to reduced testing), its major benefit is economic. Approximately 275 man-hours of effort are required to set-up, perform and evaluate the results of each DBLRT. During plant outages involving primary containment Integrated Leak Rate Tests (ILRTs), performance of a DBLRT requires approximately 15 hours of critical path time. During non-ILRT outages, the required critical path time increases to approximately 24 hours. Rental of the necessary air compressors and equipment necessary to conduct DBLRTs costs approximately $25,000, alone. These combined costs exceed the threshold of $100,000 established under the CBLA program.

Attachment 2 provides a description of the proposed changes and the associated justification (including a Basis For No Significant Hazards Consideration). A marked-up and revised copy of the affected pages from the current Technical Specifications is provided in Attachment 3. In addition, changes to EOI's previous request to adopt the Improved Standard Technical Specifications (reference EOI letter RBG-41133, Rev. 1 to LAR 93-14 dated January 18, 1995) are provided in Attachment 4 (marked-up copy and revised copy of the affected pages). Further, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1. This request has been reviewed and approved by the RBS Facility Review Committee and the Nuclear Review Board.

EOI has reviewed the proposed change against the criteria of 10 CFR51.22 for categorical exclusion from environmental impact considerations. The proposed change does not involve a significant hazards consideration or significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, EOI concludes that the proposed change meets the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

Based upon the refueling outage safety improvement and significant resource savings that can be realized by implementing this proposed change, EOI is requesting that this application be reviewed on a schedule sufficient to support the sixth refueling outage (RF-6) currently scheduled to begin January 6, 1996. As an alternative, if additional review time is required by the staff, EOI requests that DBLRT performance be deferred from RF-6 to RF-7 (presently scheduled for September 1997) and the subject amendment request remain open pending long-term resolution.

If you have any questions regarding this request or require additional information, please contact me or my staff.

Sincerely,

John R. McGaha

JRM/jcm
attachments

cc: Mr. David L. Wigginton
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Baton Rouge, LA 70884-2135
Attn: Administrator

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

LICENSE NO. NPF-47

DOCKET NO. 50-458

IN THE MATTER OF

GULF STATES UTILITIES COMPANY

CAJUN ELECTRIC POWER COOPERATIVE AND

ENTERGY OPERATIONS, INC.

AFFIRMATION

I, John R. McGaha, state that I am Vice President-Operations of Entergy Operations, Inc., at River Bend Station; that on behalf of Entergy Operations, Inc., I am authorized by Entergy Operations, Inc., to sign and file with the Nuclear Regulatory Commission, this change to the River Bend Station Physical Security Plan; that I signed this letter as Vice President-Operations at River Bend Station 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.

John R. McGaha

STATE OF LOUISIANA
PARISH OF WEST FELICIANA

SUBSCRIBED AND SWORN TO before me, a Notary Public, commissioned in the Parish of East Baton Rouge and qualified for the Parish above named, this 1st day of June, 1995.

(SEAL)

Jane Russell
Notary Public

My commission expires with life

Attachment 2

ENTERGY OPERATIONS, INC.
RIVER BEND STATION
DOCKET 50-458/LICENSE NO. NPF-47
LICENSE AMENDMENT REQUEST 95-06
(TS 3/4.6.2.2, "Drywell Bypass Leakage")

Background

Updated Safety Analysis Report (USAR) Section 6.2.1.1.2, describes the Mark III containment design at River Bend Station (RBS) which incorporates the drywell/pressure-suppression feature of previous BWR containment designs (Mark I and II) into a dry-containment type structure. The Mark III containment has three main features: (1) a drywell surrounding the reactor coolant pressure boundary, (2) a suppression pool that serves as a heat sink during normal operational transients and accident conditions, and (3) a containment structure to prevent the uncontrolled release of radioactivity to the environment.

Enclosed by the drywell are the reactor pressure vessel (RPV), the reactor coolant recirculating loops and branch connections of the Reactor Coolant System (RCS) which have isolation valves at the primary containment boundary. The function of the drywell is to maintain a pressure boundary that channels steam from a loss of coolant accident (LOCA) through the 129 vents in the drywell wall into the suppression pool. The steam is condensed in the suppression pool, and the air forced from the drywell is released into the primary containment (or wetwell). The pressure-suppression capability of the suppression pool assures that the peak LOCA temperature and pressure in the primary containment are kept below the design limits of 185°F and 15 psig, respectively. The drywell also shields accessible areas of the containment from radiation originating in the reactor core and RCS.

Structural integrity of the primary containment is largely dependent on the drywell's ability to perform its safety function. Steam from a LOCA that bypasses the suppression pool would compress the air in the wetwell (i.e., the space between the exterior wall of the drywell and the interior wall of primary containment) and could result in excessive primary containment pressures. There are several potential sources of steam bypass leakage paths. These include potential cracks in the drywell concrete structure and various penetrations through the drywell structure. Ventilation and piping penetrations are designed to ASME Code Class 2 and Seismic Category I requirements. These penetrations are also designed with two isolation valves in series with one valve in the drywell and another either outside containment or in the wetwell. High energy lines that extend into the wetwell such as the main steam lines and feedwater lines are encapsulated by guard pipes to direct energy to the drywell in case of a piping rupture. Electrical penetrations are sealed with a high strength/density material that will prevent leakage as well as provide radiation shielding.

Steam bypass effects of the suppression pool on primary containment integrity have been evaluated and this evaluation is described in USAR Section 6.2.1.1.3.4. The drywell leakage capacity was evaluated for a spectrum of primary system rupture sizes (areas). The limiting fault case was determined to be a very small reactor system break which would not result in automatic reactor depressurization in conjunction with only one available containment cooler. Drywell bypass leakage area is expressed in terms of the parameter $A/\sqrt{k}$, where A is the flow area of leakage (ft^2) and k is the geometric and friction loss coefficient. When containment cooling and heat sinks are considered as a means of mitigating the effects of bypass leakage the allowable $A/\sqrt{k}$ increases to 1.0 ft^2. This is assumed in the design bases for the drywell since containment cooling is designed to be available post-LOCA. An $A/\sqrt{k}$ value of 1.0 ft^2 is equivalent to a bypass leakage rate of 9,600 scfm at a drywell design pressure of 25 psig.

During the preservice or preoperational test of the drywell at RBS, the adequacy and conservatism of the drywell design was confirmed. With the drywell pressurized to its design pressure of 25 psig, drywell structural strain and displacements were extensively monitored. Evaluation of the test results concluded that the drywell remained essentially elastic throughout the test and actual displacements were considerably smaller than predicted by design. Additionally, post-test examination of the drywell surfaces revealed only slight cracking of the concrete (which was determined to be insignificant) with no signs of distress or damage to either the concrete structure or the steel liner.

RBS Technical Specification (TS) 3/4.6.2.2, "Drywell Bypass Leakage," currently requires that a Drywell Bypass Leakage Rate Test (DBLRT) be performed at least once every 18 months to verify that the steam bypass leakage area is less than or equal to 10% of the minimum acceptable $A/\sqrt{k}$ design value of 1.0 ft^2. The corresponding allowable leakage rate limit is 4,011 scfm with the drywell pressure at 3.0 psig. Testing is conducted at this reduced pressure so that the water level in the suppression pool remains slightly above the first row of horizontal vents. At RBS, the drywell bypass leakage rate is determined using the pressure decay test method.

In view of and based upon the excellent performance of the drywell structure to date, EOI believes that a reduction in these testing requirements is warranted. The results for the DBLRTs conducted since initial plant startup, including five periodic tests (see Attachment 6), have revealed an $A/\sqrt{k}$ that is significantly less than the allowable limit.

This testing involves approximately 275 man-hours of effort to set up, perform, and evaluate the DBLRT test results. During plant outages involving primary containment Integrated Leak Rate Tests (ILRTs), performance of a DBLRT requires approximately 15 hours of critical path time. During non-ILRT outages, the required critical path time increases to approximately 24 hours. Rental of the required air compressors and equipment required to conduct DBLRTs costs approximately $25,000, alone. Costs for performance of one DBLRT are estimated to be approximately $500,000. When considering the remaining 30 years of plant life, this would equate to a cost savings of approximately $6,500,000 based upon a five year DBLRT

performance frequency. Additional information concerning DBLRT performance costs is provided in Attachment 5.

Description of Proposed Change

Based upon the aforementioned, the RBS Technical Specifications currently require performance of a DBLRT at least once every 18 months. In accordance with 10CFR50.90, Entergy Operations, Inc. (EOI) proposes to change TS 4.6.2.2 to allow the time interval between performances of the DBLRT to be increased from 18 months to 5 years with requirements for more frequent testing if drywell performance degrades. Drywell structural integrity inspections will still be performed prior to actual DBLRT performance. Specifically, EOI proposes that TS 4.6.2.2 be revised to read as follows:

> "The drywell bypass leakage rate test shall be conducted at least once per 5 years at an initial differential pressure of 3.0 psid and the $A/\sqrt{k}$ shall be calculated from the measured leakage. One drywell air lock door shall remain open during the drywell leakage test such that each drywell door is leak tested during at least every other leakage rate test. If any Drywell Bypass Leakage Rate Test fails to meet the specified limit, the frequency shall be increased to at least once per 36 months; if the subsequent test meets the limit, the 5-year schedule may be resumed. If two consecutive tests fail to meet the limit, a test shall be performed at least once every 18 months until two consecutive tests meet the limit, at which time the 5-year test schedule may be resumed."

Attachment 3 reflects these proposed changes with the associated marked-up and revised pages from the current TS sections. In addition, as the NRC is currently reviewing EOI's request to adopt the Improved Standard Technical Specifications or ITS (reference RBG-41133, Rev 1 to LAR 93-14 dated January 18, 1995), the proposed changes to the ITS with the associated marked-up and revised pages are contained in Attachment 4.

Justification for Proposed Change

USAR Section 6.2.1.1.3.6 describes that the purpose of the DBLRT is to verify over the life of the plant that steam leakage bypassing the suppression pool for the full range of postulated primary system breaks is less than the maximum allowable design leakage. These tests are performed with the drywell isolated from containment and the air space exterior to the drywell near atmospheric pressure. The drywell is maintained at the test pressure (approximately 3 psig) for a minimum of 1 hour to allow the drywell atmosphere to stabilize. Afterwards, the drywell leakage rate is determined using the air flow or pressure decay methods. The drywell leakage rate is deemed acceptable if the measured leakage rate over 4 hours is less than or equal to 4,011 scfm, which is 10% of the maximum allowable leakage at 3 psig.

Present testing requirements established for the DBLRT were originally based primarily on engineering judgment since no previous Mark III performance data were available. As such, Appendix A of Standard Review Plan Section 6.2.1.1.c (NUREG-0800) conservatively established the test frequency as once every 18 months (or each refueling outage). Six years of performance test data are now available to support a change to a five year DBLRT frequency and a performance-based approach for future scheduling of DBLRTs.

Historical Surveillance Results

Multiple DBLRTs have been performed since the initial startup of RBS. These tests have consistently proven the reliability of the drywell. The measured leakage rates over the six 6 separate tests have been significantly less than both the allowable and design limits. Results of these previous RBS drywell bypass leakage rate surveillances are shown in Attachment 6. RBS has not experience any negative affects from pressure, temperature, radiation or chemistry to date and, based upon present operating data and controls, does not anticipate any concerns in the future.

The proposed change employs a performance-based approach in establishing the DBLRT frequency. The change to a five-year interval for conducting this test is based on excellent performance of the drywell as demonstrated over the past approximately ten years of plant operation. Future test results will then be used to provide the basis for continuing on the same schedule or increasing the frequency if a test failure occurs. The test frequency will be increased to at least once per 36 months in the event of one DBLRT failure and at least once per 18 months in the event of two consecutive failures. Resumption of the 5-year schedule would be allowed only after two consecutive subsequent tests have proven acceptable drywell performance.

Drywell bypass leakage can occur through potential cracks in the drywell structure and the various drywell penetrations as previously stated. Additional cracking of the drywell is not expected during the remaining life of the plant based upon the results of the structural integrity test conducted as part of the preoperational test program. The results of that testing showed that the stresses on the drywell structure while pressurized to 25 psig (design pressure) were essentially elastic with only slight cracking of the concrete surface. The drywell is typically exposed to essentially 0 psig during normal plant operation and 3.0 psig (nominally) during DBLRTs. These pressures are considerably lower than the structural integrity test pressure and are less likely to initiate a crack or cause an existing crack to grow. Visual inspections of the drywell surfaces that have been performed since the structural integrity tests have not revealed the presence of any additional cracks or abnormalities.

Surveillance Test Procedures STP-057-3700, "Containment Structural Integrity Verification/Report," and STP-057-3701, "Drywell Structural Integrity Verification/Report," are performed to meet Technical Specifications 4.6.1.6 and 4.6.2.4.1, respectively. These procedures are performed prior to the ILRT.

The performance history of these tests is as follows:

- Pre-service tests performed April, 1985
- First periodic tests performed May, 1989
- Second periodic tests performed August, 1992

RBS has reviewed the results of these tests. The results were found to be satisfactory with no obvious defects or abnormalities detected. The third periodic tests are scheduled for January, 1996.

The use of two valves in series that are either normally closed or can be closed automatically minimizes the potential leakage through other drywell penetrations. These penetrations have one isolation valve located inside the drywell and one isolation valve located outside the drywell. The outer isolation valve is located either in the wetwell or outside primary containment. Drywell penetrations with isolation valves outside primary containment are also designated as primary containment penetrations and are Local Leak Rate Tested (LLRT) in accordance with 10CFR50, Appendix J. This testing ensures that the total leakage through the penetrations is kept below the allowable limits of the LLRT program, which are much lower than that allowed for drywell leakage.

Those remaining drywell penetrations, although not subject to LLRT's, are typically isolated by the use of globe valves or gate valves. Industry experience indicates that these valve types have excellent low pressure sealing capabilities. Notable exceptions to this are the Reactor Recirculation (RR) pumps seal supply check valves and the drywell vent and purge system butterfly valves. The RR seal supply lines are designed to ASME Code Class 2 requirements up to and including the outboard drywell isolation valve. Drywell bypass leakage through this line is not likely since it would require two failures to occur (a passive failure of the ASME Code Class 2 piping between the RR pump and the first isolation valve and an active failure of both check valves to seat properly). The internal diameter of these lines is 3/4 inch and would also serve to limit the amount of drywell bypass leakage. The drywell vent and purge system drywell isolation valves are large Posi-seal butterfly valves that are sealed closed in Modes 1, 2 and 3 per TS 4.6.2.7 making them essentially passive isolation devices.

Safety Evaluation

The function of the Drywell Bypass Leakage Rate Test is to ensure that the leakage from the drywell is within acceptable limits. One effect of the proposed changes is to potentially increase the probability that drywell leakage will occur and go undetected between tests. Such leakage may be the result of leakage through drywell penetrations, through airlocks or through drywell structural faults.

Drywell airlocks are tested during each refueling cycle. Therefore, the proposed changes in DBLRT testing do not impact airlock performance.

The risk impact of drywell structural leakage is to create a release pathway for radionuclides in the event that the containment is challenged, such as in a LOCA or severe accident. Such leakage does not create any new accident scenarios nor does it contribute to the initiation of any accident. The proposed changes may affect 1) the probability for containment leakage or failure following an accident and/or 2) the consequences of such accidents. The RBS IPE examined containment response during severe accidents and provides estimates of consequences. The IPE is used as the basis for estimating the impact of changes to the drywell leakage test program.

The drywell structure is passive. Under normal conditions, there is no significant environmental or operational stress that could contribute to its degradation. Passive failures resulting in significant drywell structural leakage are, therefore, extremely unlikely to develop between drywell leakage rate tests.

The post-accident environment within the drywell may be severe and could contribute to failure of its function. Such environments were considered as part of the IPE. The IPE found, however, that postulated drywell failure under severe accident conditions is due to phenomenological effects associated with severe accidents. None of the identified drywell failure mechanisms for severe accidents would be impacted by the proposed reduction in frequency of the drywell leakage rate test program.

Four methods of drywell leakage (suppression pool bypass) were evaluated in the RBS Level 2 IPE. They are as follows:

1) SRV tailpipe failure (due to water hammer or stuck-open vacuum breaker)
2) Drywell purge system failure
3) Drywell hydrogen mixing system failure
4) Drywell hatch inflatable seals failure

Smaller penetrations were judged to be of low significance for drywell leakage and were not considered further.

SRV tailpipe failure was discounted due to the plant configuration at RBS. Failure of SRV discharge piping above the suppression pool water level cannot lead to additional drywell leakage since all of this piping is located within the drywell.

The drywell purge system is only operated during outages. During plant operation, valves in this system are required to be mechanically locked closed or the power removed from the valve operators. In addition, these valves are subject to Appendix J Type C leak rate testing. The Type C testing is effective in detecting leakage through drywell purge valves.

The hydrogen mixing system is designed to be operated during an accident. Therefore, there is a small chance that these valves will leak. If one valve was stuck open or inadvertently opened, the bypass flow through the valve would be less than the design drywell leakage. This is expected to bound any leakage past the hydrogen mixing system valves. These valves are also subject to Appendix J Type C leak rate testing. The Type C testing is also effective in detecting leakage through hydrogen mixing valves.

The drywell hatch seals are only exercised below 5% power. The hatch seals in this system are leak tested every 18 months per TS 4.6.2.3.d.2. Therefore, extending the DBLRT test frequency does not affect the amount of leakage past the drywell hatch seals.

In conclusion, drywell leakage is dominated by active failures of drywell isolation valves and drywell seal failure. The proposed changes to the Drywell Bypass Leak Rate Test program do not impact the probabilities of failure of these valves. Therefore, the conclusion of this qualitative risk assessment is that Drywell Bypass Leak Rate Tests do not significantly affect the frequency of accident sequences involving releases from the drywell.

No Significant Hazard Considerations

EOI proposes to change the current RBS Technical Specifications to allow the time interval for performance of the Drywell Bypass Leakage Rate Testing to be increased from at least once per 18 months to at least once per 5 years. The testing would be performed more frequently if drywell integrity degrades. In accordance with 10CFR50.92, a proposed change to the operating license (Technical Specifications) involves no significant hazards consideration if operation of the facility in accordance with the proposed change would not (1) involve a significant increase in the probability or consequences of any accident previously evaluated, (2) create the possibility of a new or different kind of accident from previously evaluated, or (3) involve a significant reduction in a margin of safety. This request is evaluated against each of these criteria as follows:

(1) The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that contribute to initiation of any accidents previously evaluated. Thus, the proposed change cannot increase the probability of any accident previously evaluated.

The proposed change potentially affects the leak tight integrity of the drywell, a structure used to mitigate the consequences of a loss of coolant accident (LOCA). The function of the drywell is to channel the steam released from a LOCA through the suppression pool, limiting the amount of steam released to the primary containment atmosphere. This limits the containment pressurization due to the LOCA. The leakage of the drywell is limited to ensure that the primary containment does not exceed its design limits of 185°F and 15 psig. Because the proposed change does not alter the plant design, only the frequency of measuring the drywell leakage, the proposed change does not directly result in an increase in drywell leakage. However, decreasing the test frequency can increase the probability that a large increase in drywell bypass leakage could go undetected for an extended period of time. There are several potential sources of steam bypass leakage paths. These include potential cracks in the drywell concrete structure and various penetrations through the drywell structure. Based upon the results of the structural integrity test conducted as part of the preoperational or preservice test program, additional cracking of the drywell is not expected during the remaining life of the plant. Ventilation and piping penetrations are designed with two isolation valves in series with one valve in the drywell and another either outside primary containment or in the wetwell. High energy lines that extend into the wetwell, such as the Main Steam line and Feedwater lines, are encapsulated by guard pipes to direct energy to the drywell in case of a piping rupture. Electrical penetrations are sealed with a high strength/density material that will prevent leakage as well as provide radiation shielding. The TS DBLRT acceptance criterion of 10% of the design $A/\sqrt{k}$ provides margin for degradation. Drywell performance data to date suggests that drywell degradation, even during a five year interval between tests, will not exceed this margin. RBS presently has on docket with the staff a submittal (reference EOI letter RBG-41133, Rev. 1 to LAR 93-14 dated January 18, 1995) that allows the acceptance criteria, between required leakage rate tests, to be $A/\sqrt{k}$ since at $A/\sqrt{k}$, the containment temperature and pressurization response are bounded by the assumptions of the safety analysis.

Based on the above, EOI has concluded that the proposed change will not result in a significant increase in the consequences of any accident previously evaluated.

(2) The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that could contribute to initiation of any accidents. Thus, the proposed change cannot create the possibility of an accident not previously evaluated.

(3) The proposed change only affects the frequency of measuring the drywell bypass leakage rate and does not change the bypass leakage limit for the drywell. However, the proposed change can increase the probability that a large increase in drywell bypass leakage could go undetected for an extended period of time. Operational experience has shown that the leak tightness of the drywell has been maintained significantly below the allowable leakage limits. In fact, an analysis was conducted to determine the potential risk to the public from the proposed change. Based on this analysis, under several different accident scenarios, the risk of radioactivity release from containment was found to be negligible.

As a result, EOI has concluded that the proposed change will not result in a significant reduction in the margin of safety.

Based on the foregoing, EOI concludes that this request does not involve a significant hazards consideration.

Environmental Impact Consideration

RBS has reviewed this request against the criteria of 10CFR51.22 for environmental considerations. This regulation allows for a categorical exclusion provided that (i) the amendment involves no significant hazards consideration, (ii) there is no significant change in the amounts of any effluents that may be released offsite, and (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

As discussed above, the request is for a change in testing frequency for DBLRT performance. This request has been determined by EOI not to involve a significant hazards consideration. The change will continue to allow for timely and accurate determination of the radiological plant effluents and will not affect the amounts or types of effluents since this change only concerns testing frequency. The requested change would reduce the testing frequency only and, consequently, would not increase the individual or cumulative occupational radiation exposure.

RBS concludes that the proposed change meets the criteria given in 10CFR51.22 (c)(9) for a categorical exclusion from the requirement for an environmental impact statement.

Schedule for Attaining Compliance

Based upon the refueling outage safety improvement and significant resource savings that can be realized by implementing this proposed change, EOI is requesting that this application be reviewed on a schedule sufficient to support the sixth refueling outage (RF-6) currently scheduled to begin January 6, 1996. As an alternative, if additional review time is required by the staff, EOI

requests that DBLRT performance be deferred from RF-6 to RF-7 (presently scheduled for September 1997) and the subject amendment request remain open pending long-term resolution.

Notification of State Personnel

A copy of this amendment request has been provided to the State of Louisiana, Department of Environmental Quality - Radiation Protection Division.