



**ENTERGY**

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November 20, 1995

**C. R. Hutchinson**

Vice President  
Operations  
Grand Gulf Nuclear Station

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Stop P1-37  
Washington, D.C. 20555-0001

Subject: Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29  
Response to Generic Letter 92-01, Revision 1,  
Supplement 1: "Reactor Vessel Structural  
Integrity"

GNRO-95/00125

Gentlemen:

By letter dated May 19, 1995, the USNRC issued Generic Letter (GL) 92-01, Revision 1, Supplement 1. This generic letter contains four items requiring responses from licensees resulting from review and assessment of any new data pertinent to their existing RPV integrity analyses. The reporting requirements of this generic letter permitted licensees to submit staggered responses to these items due to the potential difficulties that may be encountered in ascertaining the information requested.

The GGNS response to part (1) of the required information listed in GL 92-01, Revision 1, Supplement 1 was submitted by letter dated August 14, 1995 [Reference 1]. Attachment 1 to this submittal delineates the GGNS response to the remaining parts of the required information; parts (2), (3), and (4).

As stated in our August 14, 1995 response to part (1), the responses to parts (2), (3), and (4) are preliminary. GGNS is participating in and endorse the industry initiative to address RPV integrity issues denoted in GL 92-01, Revision 1, Supplement 1.

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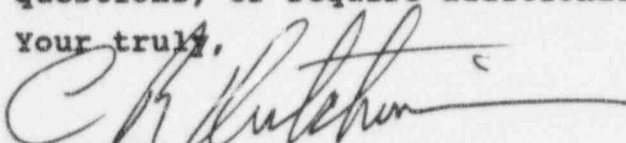
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Final evaluation of any new pertinent data for impact on the GGNS RPV integrity analyses is anticipated to be consistent with the action plan and schedule submitted by the BWRVIP [Reference 2] and referenced in our August 14, 1995 submittal.

We will apprise you of any new pertinent data impacting the GGNS RPV integrity analyses resulting from the industry initiative, should such data be identified. In the interim, the existing GGNS RPV integrity analyses remain conservatively bounded by the latest data available as delineated in Reference 3 and submitted to the NRC.

Attachment 2 provides the affirmation for the information provided in this response per the requirements of 10 CFR 50.54(f). Please contact Charles E. Brooks at (601) 437-6555 should you have any questions, or require additional information.

Your truly,



CRH/CEB/amb

attachments: 1) GGNS Response to GL 92-01, Revision 1, Supplement 1 (parts 2, 3, and 4)  
2) Affirmation per 10CFR50.54(f)

cc:

Mr. H. W. Keiser (w/a)  
Mr. R. B. McGehee (w/a)  
Mr. R. S. Reynolds (w/a)  
Mr. J. E. Tedrow (w/a)  
Mr. H. L. Thomas (w/a)

Mr. L. J. Callan (w/a)  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
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Mr. Paul W. O'Connor, Project Manager (w/2)  
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U. S. Nuclear Regulatory Commission  
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Attachment 1

to

GNRO-95/00125

Response to Generic Letter 92-01, Revision 1, Supplement 1  
(Parts 2, 3, and 4)

"Reactor Vessel Structural Integrity"

Grand Gulf Nuclear Station (GGNS)  
Response to Generic Letter 92-01  
Revision 1, Supplement 1

"Reactor Vessel Structural Integrity"

Required Information

Required Information Item 2:

Provide an assessment of any change in best-estimate chemistry based on consideration of all relevant data.

GGNS Response to Item 2:

An assessment of best-estimate chemistry is a longer range industry effort. In the interim, data currently available to the BWRVIP, which includes GGNS plant specific data [Reference 3] have been used to determine bounding chemistries, since these current bounding chemistries are expected to be conservative compared to future best-estimate chemistries.

Required Information Item 3:

Provide a determination of the need for use of the ratio procedure in accordance with the established Position 2.1 of Regulatory Guide 1.99, Revision 2. For those licensees that use surveillance data, provide a basis for the RPV integrity evaluation.

GGNS Response to Item 3:

Position 2.1 of Regulatory Guide 1.99, Revision 2 establishes a method which can be used to adjust the beltline  $\Delta RT_{NDT}$  calculation based on the results of at least two surveillance capsule tests. GGNS has not tested a surveillance capsule, and consequently Item 3 is not currently applicable.

Required Information Item 4:

Provide a written report providing any newly acquired data as specified above and (1) the results of any necessary revisions to the evaluation of RPV integrity in accordance with the requirements of 10 CFR 50.60, 10 CFR 50.61, Appendices G and H to 10 CFR Part 50, and any potential impact on the LTOP or P-T limits in the technical specifications or (2) a certification that the previously submitted evaluations remain valid. Revised evaluations and certifications should include consideration of Position 2.1 of Regulatory Guide 1.99, Revision 2, as applicable, and any new data.

GGNS Response to Item 4:

Using bounding chemistries as the basis, the need to revise RPV integrity evaluations was assessed for all US BWR/2-6 plants, including GGNS. Reference 3 provides the written report delineating any newly acquired data. USE and P-T curve evaluations (10 CFR 50.60 and Appendices G and H to 10 CFR Part 50) are the only RPV integrity evaluations that need to be evaluated for BWRs based on their inherent operating characteristic, i.e., operation with a large water inventory at saturated steam conditions.

Section 2.0 of the BWRVIP report [Reference 3] provides a discussion of the USE issue. As seen from Table 2-1 of Reference 3, the EMA analysis for USE remains bounding for GGNS.

Variability in weld chemistry has the potential to impact the degree of conservatism in the P-T curves in BWR plants Technical Specifications. As depicted in Table 3-1 of the BWRVIP report [Reference 3], GGNS is classified as a plant whose beltline welds have "acceptable variability" in chemistry and need not be evaluated for the impact of variabilities in weld chemistry on GGNS P-T curves. As such, we certify that the previously submitted evaluations remain valid.

References

1. Letter from C. R. Hutchinson (Entergy Operations, Inc. - GGNS) to the U. S. Nuclear Regulatory Commission, "Response to Generic Letter 92-01, Revision 1, Supplement 1, "Reactor Vessel Structural Integrity", dated August 14, 1995.
2. Letter from J. T. Beckham, Jr. (Chairman, BWRVIP) to the U. S. Nuclear Regulatory Commission, "BWRVIP Response to Generic Letter 92-01, Revision 1, Supplement 1, "Reactor Vessel Structural Integrity", dated August 10, 1995.
3. Letter from J. T. Beckham, Jr. (Chairman, BWRVIP) to the U. S. Nuclear Regulatory Commission, "BWRVIP Response to Information Requests in Generic Leter 92-01, Revision 1, Supplement 1, "Reactor Vessel Structural Integrity", dated November 15, 1995. [ZPRI Report TR-105908]



Attachment 2

to

GNRO-95/00125

Response to Generic Letter 92-01, Revision 1, Supplement 1  
(Parts 2, 3, and 4)

"Reactor Vessel Structural Integrity"

Affirmation Per 10CFR50.54(f)

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

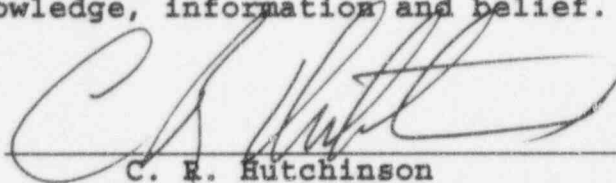
LICENSE NO. NPF-29

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, C. R. Hutchinson, 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 response to Generic Letter 92-01, Revision 1, Supplement 1 for the Grand Gulf Nuclear Station; that I signed this response 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.

  
C. R. Hutchinson

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 20<sup>th</sup> day of November, 1995.

(SEAL)

  
Notary Public

MISSISSIPPI STATEWIDE NOTARY PUBLIC  
MY COMMISSION EXPIRES JUNE 5, 1998  
BONDED THRU STEGALL NOTARY SERVICE