

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 me, a Notary Public, in and for the County
and State above named, on 29th day of April, 1992.

(SEAL)

Elizabeth L. Lang

Notary Public

My commission expires:

December 28, 1995

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PROPOSED CHANGE TO THE OPERATING LICENSE

REACTOR PROTECTION SYSTEM INSTRUMENTATION, CONTROL ROD BLOCK
INSTRUMENTATION, AND SOURCE RANGE MONITORS

(GGNS PCOL-92/02)

A. SUBJECT: Reactor Protection System Instrumentation, Control Rod Block Instrumentation, and Source Range Monitors (SRM)

Technical Specifications 3/4.3.1, 3/4.3.6 and 3/4.3.7.6

Affected Pages: 3/4 3-1, 3/4 3-52, 3/4 3-53, 3/4 3-54, 3/4 3-56, 3/4 3-57, and 3/4 3-77

B. DISCUSSION:

During a planned reactor shutdown on December 29-30, 1991, rod insertion was stopped to perform the SRM control rod block functional surveillance (SRM Detector not full-in). Plant operating procedures require the SRM not full-in surveillance be completed before reactor power is reduced below range 3 on the Intermediate Range Monitors (IRM). The negative reactivity inserted prior to ceasing rod insertion was enough for reactor power to decrease to IRM range 1 before the surveillance could be completed, violating the plant shutdown operating procedure. Temperature ultimately decreased adding sufficient reactivity through moderator and fuel doppler coefficient feedback for a brief return to criticality. Although the return to criticality was anticipated, recognized and controlled by the operating crew, the delay in rod insertion to perform the SRM surveillance contributed to the procedure violation and the unplanned return to criticality. A Notice of Violation was issued on February 11, 1992 for the procedure violation [Reference 7]. The proposed changes clarify SRM operability and surveillance requirements and allow the SRM surveillances to be performed without undue influence on plant operations during controlled shutdowns following operation in Operational Condition 1. These proposed changes are directly related to preventing recurrence of this type of event.

This proposed amendment to the Grand Gulf Nuclear Station (GGNS) Technical Specifications (TS) requests changes to Specifications 3/4.3.1, Reactor Protection System Instrumentation, 3/4.3.6, Control Rod Block Instrumentation and 3/4.3.7.6, Source Range Monitors.

The proposed changes are described as follows:

TS 3/4.3.1 Reactor Protection System (RPS) Instrumentation:

- 1) A new surveillance requirement (4.3.1.4) is proposed for the Reactor Protection System Instrumentation. The proposed requirement states that the provisions of Specification 4.0.4 are not applicable to the IRM Channel Functional Test for 12 hours when entering the applicable operational conditions from Operational Condition 1. The proposed wording for this new requirement is as follows:

4.3.1.4 The provisions of Specification 4.0.4 are not applicable to the Channel Functional Test surveillances for the Intermediate Range Monitors for entry into the applicable OPERATIONAL CONDITIONS (as specified in Table 4.3.1.1-1) from OPERATIONAL CONDITION 1, provided the surveillances are performed within 12 hours after such entry.

TS 3/4.3.6 Control Rod Block Instrumentation:

- 2) Surveillance requirement 4.3.6 is renumbered to 4.3.6.1 and a new surveillance requirement (4.3.6.2) is proposed for the Control Rod Block Instrumentation. The proposed requirement states that the provisions of Specification 4.0.4 are not applicable to the Intermediate Range Monitor (IRM) and Source Range Monitor (SRM) Channel Functional Tests for 12 hours when entering the applicable operational conditions from Operational Condition 1. The proposed wording for this new requirement is as follows:

4.3.6.2 The provisions of Specification 4.0.4 are not applicable to the Channel Functional Test surveillances for the Intermediate Range Monitors and Source Range Monitors for entry into their applicable OPERATIONAL CONDITIONS (as specified in Table 4.3.6-1) from OPERATIONAL CONDITION 1, provided the surveillances are performed within 12 hours after such entry.

- 3) A new footnote (##) is added to Table 3.3.6-1 clarifying the specified conditions for SRM operability. This footnote references the conditions specified in notes (a) through (c), which describe when each function is bypassed. [i.e. ## Whenever the related function is not bypassed as specified in notes (a) through (c).] Operational Condition "2" in Table 3.3.6-1 is changed to "2^{##}" for items 3a-d.
- 4) A new footnote (##) is added to Table 4.3.6-1 clarifying the specified conditions for performing SRM channel functional test and channel calibration surveillances. This footnote is similar to the note added in item 3 above and references the conditions specified in notes (a) through (c) of Table 3.4.6-1. [i.e. ## Whenever the related function is not bypassed as specified in Table 3.3.6-1 notes (a) through (c).] Operational Condition "2" in Table 4.3.6-1 is changed to "2^{##}" for items 3a-d.

TS 3/4.3.7.6 Source Range Monitors:

- 5) The word "OPERATIONAL" is inserted before the word "CONDITION" in 4.3.7.6.a.1.a) and b). This is consistent with the term "OPERATIONAL CONDITION" as defined in TS 1.28 and is an editorial change.

- 6) A new footnote (#) is added to 4.3.7.6.b.2 to exempt the SRM channel functional test from the provisions of Specification 4.0.4 for 12 hours when entering Operational Conditions 2*, 3 or 4 from Operational Condition 1. The proposed wording for this new requirement is as follows:

The provisions of Specification 4.0.4 are not applicable to the Source Range Monitor Channel Functional test surveillances for entry into OPERATIONAL CONDITIONS 2*, 3 or 4 from OPERATIONAL CONDITION 1, provided the surveillances are performed within 12 hours after such entry.

- 7) Surveillance requirement 4.3.7.6.b.1 is revised to eliminate potential confusion in the present wording. The present wording of 4.3.7.6.b.1 is: "Within 24 hours prior to moving the reactor mode switch from the Shutdown position, if not performed within the previous 7 days". The proposed wording for this surveillance states: "Within 7 days prior to moving the reactor mode switch from the Shutdown position". The proposed wording is equivalent while removing the source of possible confusion. This is an editorial change.

C. JUSTIFICATION:

The proposed changes can be grouped into one of three categories: (1) to incorporate statements of exception to Technical Specification (TS) 4.0.4 (items 1, 2 and 6), (2) to clarify SRM control rod block applicability (items 3 and 4), (3) editorial changes. These categories are discussed separately below.

Technical Specification 4.0.4 Exceptions (items 1, 2 & 6):

As discussed above, Entergy Operations proposes to incorporate exceptions to the provisions of TS 4.0.4 for the IRM functions of the RPS (TS 3/4.3.1), the IRM and SRM functions of the Control Rod Block Instrumentation (TS 3/4.3.6), and the SRM Instrumentation (TS 3/4.3.7). These exceptions to TS 4.0.4 will only be applicable during plant shutdowns following operation in Operational Condition 1.

The proposed exceptions are consistent with those suggested by the NRC Staff in Generic Letter (GL) 87-09. GL 87-09 recommends changes to Specification 4.0.3 to allow up to 24 hours to complete the surveillance requirements before implementing the ACTION requirements. The GL 87-09 recommendations were granted for the Grand Gulf Nuclear Station Technical Specifications by Amendment 69, dated August 14, 1990. In GL 87-09, the NRC Staff recognized that conflicts could arise when surveillance requirements can only be completed after entry into a mode or specified condition for which the surveillance requirements apply. In addition, the NRC Staff recognized that a second conflict could arise because, the requirements of Specification 4.0.3 may not be met because the surveillance requirements may not have been performed within the required surveillance

interval. In these cases, the Staff recognized that exceptions to Specification 4.0.4 would be appropriate.

As asserted in GL 87-09, the assumption that systems and components are inoperable because the surveillance requirement has not been performed is overly conservative. The proposed TS 4.0.4 exceptions provide a method of testing the instrumentation per TS 4.0.3 in order to confirm operability. Note that the TS 4.0.4 exceptions proposed contain an inherent TS 3.0.4 exception for the purposes of completing the surveillance requirements. This is consistent with other TS 4.0.4 exceptions and the bases for Specification 4.0.3. The proposed 12 hour limit does not apply to instrumentation known to be inoperable for reasons other than not meeting surveillance requirements.

Intermediate Range Monitors

The IRM system provides neutron flux level information during reactor heatup and startup operations. The IRM system consists of eight moveable detectors, two in each of the four RPS channels. Each IRM is a five-decade, ten-range instrument with control rod block and RPS trip setpoints of 108 and 120 divisions of scale, respectively. These setpoints are active in each of the ten ranges. Thus, as an IRM is "ranged up" to accommodate increases in reactor power, the trip setpoints are also ranged up. The IRMs are withdrawn from the core while in Operational Condition 1 to prolong their life.

TS 3/4.3.1 requires the IRM Neutron Flux-High and Inoperative RPS functions to be operable in Operational Conditions 2, 3, 4, and 5. TS 3/4.3.6 requires Detector not full-in, Upascale, Inoperative, and Downscale control rod block functions to be operable in Operational Conditions 2 and 5. Although not required in Operational Condition 1, the IRM Neutron Flux-High and Inoperative RPS functions must be maintained current to avoid a technical violation of Specification 4.0.4 in the event of a reactor scram.

TS 4.0.4 prohibits entry into an operational condition unless the surveillance requirement(s) associated with the TS has been performed within the applicable surveillance interval. As a result, the reactor mode switch cannot be placed in the STARTUP position (operational Condition 2) or Shutdown position (Operational Condition 3) after operation in Operational Condition 1 until the IRM rod block and RPS surveillances have been performed.

One option to satisfy the TS 4.0.4 requirement is to declare all IRMs inoperable and enter the applicable ACTION statement. The ACTION statement for TS 3.3.1 requires that one reactor protection system (RPS) trip system be placed in the tripped condition (half-scram condition) within one hour. Likewise, the ACTION statement for TS 3.3.6 requires one of the IRM channels be placed in the tripped condition. This results in a control rod block and, since the same logic serves both the rod block and scram functions, this also results in the RPS logic being placed in the tripped condition. Performing the IRM functional surveillances with a half-scram condition results in a

significant increase in the probability of a full RPS actuation and safety-system challenges and places an additional burden on operating personnel.

Another option is to perform these surveillances in Operational Condition 1. During plant operation in Operational Condition 1 (mode switch in RUN), only a limited functional test of the IRM trips can be performed because the rod block and RPS trip functions are bypassed. The IRM detector not full-in function cannot be completed in Operational Condition 1 because the IRMs are withdrawn from the core. Performing the weekly IRM Functional surveillance in Operational Condition 1 causes unnecessary equipment manipulations and places an unnecessary burden on operating personnel since the IRM RPS and rod block functions are not required in Operational Condition 1.

As asserted in GL 87-09, the assumption that systems and components are inoperable because the surveillance requirement has not been performed is overly conservative. The proposed TS 4.0.4 exceptions provide a method of testing the instrumentation per TS 4.0.3 in order to confirm operability. Therefore, Entergy Operations proposes that an exception to the provisions of TS 4.0.4 be added to the IRMs to allow entry into the plant conditions necessary to perform this testing. Additionally, Entergy Operations proposes a limit on this exception to require that the surveillances be performed within 12 hours after entering the applicable operational conditions (modes 2 or 3). The proposed TS 4.0.4 exception together with the proposed time limit, will provide adequate time for the IRM surveillances to be completed without impeding operator's efforts to complete an orderly plant shutdown/cooldown.

This proposed change is justified on the basis that, since the reactor will already be in a shutdown condition (as the result of a scram) or be in the process of a controlled shutdown with the Average Power Range Monitor (APRM) scram function (15% power) operable, adequate scram protection is available during the brief period needed to perform the IRM surveillances. In fact, for controlled shutdowns, the proposed change enhances safety by facilitating entry into the STARTUP mode which lowers the APRM scram and rod block setpoints to 15% and 12%, respectively, and activates the IRM scram and rod block functions. The IRM control rod block functions are provided only to ensure that adequate neutron monitoring is available during control rod movement. Grand Gulf Nuclear Station's Updated Final Safety Analysis Report (UFSAR) Chapter 15 analysis does not rely on the IRM rod block functions to ensure safety in any accident/transient analysis. Again, the APRMs are adequate to perform this monitoring function during the period needed to perform the IRM surveillances in Operational Condition 2. During Operational Conditions 3 and 4, the control rods would already be inserted and the Reactor Mode Switch-Shutdown Function provides a control rod block, preventing control rod withdrawal.

Source Range Monitors

The SRM system consists of six moveable detectors that provide neutron flux information during reactor startup and low flux level operations. TS 3/4.3.7.6, Source Range Monitors, requires the SRMs to be operable in Operational Conditions 3 and 4 and in Operational Condition 2 with the IRMs on range 2 or below. TS 3/4.3.6, Control Rod Block Instrumentation, requires the SRM Detector not full-in, Upscale, Inoperative, and Downscale control rod block functions to be operable in Operational Conditions 2 and 5. The SRMs are not required in Operational Condition 1 and are withdrawn from the core to decrease the neutron flux level to which the detector is exposed, thereby prolonging detector life. These exceptions to TS 4.0.4 will only be applicable during plant shutdowns following operation in Operational Condition 1. For example, during a controlled shutdown from Operational Condition 1, the SRM detector not full-in rod block functional test would not be required for 12 hours after entering the condition where this function is active (less than or equal to 100 counts per second with the IRM channels below range 3).

Similar to the IRM control rod block functions discussed above, the SRM not full-in functional test cannot be performed during operation in Operational Condition 1 because the detectors are fully withdrawn and only a limited functional test of the remaining SRM rod block functions can be performed because they are bypassed. Again, the assumption that systems and components are inoperable because the surveillance requirement has not been performed is overly conservative. The proposed TS 4.0.4 exceptions provide a method of testing the instrumentation per TS 4.0.3 in order to confirm operability. Therefore, Entergy Operations proposes that an exception to the provisions of TS 4.0.4 be added to allow entry into the plant conditions necessary to perform this testing. Additionally, Entergy Operations proposes a limit on this exception to require that the surveillance be performed within 12 hours after entering the applicable operational conditions (modes 2 or 5.) The SRM control rod block functions are provided only to ensure that adequate neutron monitoring capability exists during control rod movement very low power levels during reactor startup and shutdown. Grand Gulf's UFSAR Chapter 15 analysis does not rely on the SRM rod block functions to ensure safety in any accident/transient analysis.

As discussed in section B, reactivity addition through moderator and fuel doppler coefficient feedback, as reactor temperature decreases, can be sufficient to cause the reactor to return to criticality during a controlled shutdown. The proposed TS 4.0.4 exception together with the proposed time limit, will provide adequate time for the SRM surveillances to be completed while operators proceed with a controlled shutdown by inserting control rods. The proposed change will enhance safety by facilitating an orderly shutdown and reducing the potential for re-criticality.

Clarification of SRM Control Rod Block Applicability (Items 3 and 4):

TS 3/4.7.6 requires the SRM to be operable in Operational Conditions 3 and 4 and in Operational Condition 2 when the IRMs are on range 2 or below. TS 3/4.3.6, Table 3.3.6-1, requires the SRM rod block functions to be operable in Operational Conditions 2 and 5. Table 3.3.6-1 further specifies (via notes on the various SRM trip functions) when the SRM trip functions are bypassed.

The bases for TS 3/4.3.7.6 state that the SRMs provide reactor operators with information regarding the status of the neutron level in the core at very low power levels during reactor startup and shutdown. When the IRMs are on scale, adequate neutron level information is available without the SRMs so the SRMs can be withdrawn. In fact, operators must withdraw the SRMs from the core as reactor power is increased to avoid unnecessary rod blocks. This ensures detector life is prolonged by decreasing the neutron flux level to which the detector is exposed. In addition to providing operators with neutron level information, the SRM system provides the operator with period information during an approach to criticality and will initiate a control rod block preventing control rod withdrawal under certain conditions.

When the IRMs are on range 3 or higher, adequate neutron level is available to operators via the IRMs so the SRMs and their associated control rod block functions are no longer required. The proposed change is therefore consistent with the requirements for neutron level monitoring capability and clarifies that the SRM control rod block functions are only required operable when the associated rod block functions are not bypassed.

Editorial Changes (Items 5 and 7):

The proposed changes to surveillance requirement 4.3.7.6.a.1 (item 5) are purely editorial and are made to make these specifications consistent with Definition 1.28 of the GGNS Technical Specifications. This change is also consistent with the use of this term in other areas of the GGNS Technical Specifications. Therefore, this proposed change does not alter the technical requirements of these surveillances.

Item 7 is an editorial change that clarifies surveillance requirement 4.3.7.6 by removing potentially confusing wording regarding the surveillance frequency. TS 4.3.7.6 requires a Channel Functional Test of the SRMs to be performed within 24 hours prior to moving the reactor mode switch from the shutdown position, if not performed within the previous seven days. The wording of this specification is potentially confusing because of the 24 hour clause. This clause appears to require anticipation of the exact time the mode switch will be moved from the Shutdown position, which is not always possible. The proposed wording – "within 7 days prior to moving the reactor mode switch from the Shutdown position" – provides equivalent assurance the SRM is operable, while removing the source of possible confusion.

This changes are justified since they will make the Technical Specification easier to implement while providing the same degree of confidence that the associated instrumentation is operable.

The changes described (items 1-7) are similar to amendment requests proposed by other BWR-6 licensees (reference proposed operating license amendments by Illinois Power for the Clinton Power Station dated August 31, 1990 and Centerior Energy for the Perry Nuclear Power Plant dated March 28, 1991). Safety Evaluation Report related to Amendment No. 41 to Operating License No. NPF-58 for the Perry Nuclear Power Plant was issued on March 20, 1992.

D. NO SIGNIFICANT HAZARDS CONSIDERATIONS:

Entergy Operations, Inc. proposes the modification of the current surveillance requirement contained in Technical Specifications (TS) 3/4.3.1, Reactor Protection System Instrumentation, 3/4.3.6, Control Rod Block instrumentation and 3/4.3.7.6, Source Range Monitors. The proposed Technical Specification (TS) changes address the following:

- 1) A new surveillance requirement (4.3.1.4) is proposed for the Reactor Protection System Instrumentation. The proposed requirement states that the provisions of Specification 4.0.4 are not applicable to the Intermediate Range Monitor (IRM) Channel Functional Test for 12 hours when entering the applicable operational conditions from Operational Condition 1.
- 2) It is proposed that surveillance requirement 4.3.6 be renumbered to 4.3.6.1 and a new surveillance requirement (4.3.6.2) be added for the Control Rod Block Instrumentation. The proposed requirement states that the provisions of Specification 4.0.4 are not applicable to the IRM and Source Range Monitor (SRM) Channel Functional Test for 12 hours when entering the applicable operational conditions from Operational Condition 1.
- 3) A new footnote (##) is added to Table 3.3.6-1 clarifying the specified conditions for SRM operability. This footnote references the conditions specified in notes (a) through (c), which describe when each function is bypassed. (e.g., ## Whenever the related function is not bypassed as specified in notes (a) through (c).) Operational Condition "2" in Table 3.3.6-1 is changed to "2##" for items 3a-c.

- 4) A new footnote (##) is added to Table 4.3.6-1 clarifying the specified conditions for performing SRM surveillances. This footnote is similar to the note added in item 3 above and references the conditions specified in notes (a) through (c) of Table 3.4.6-1. (e.g., ## Whenever the related function is not bypassed as specified in Table 3.3.6-1 notes (a) through (c).) Operational Condition "2" in Table 4.3.6-1 is changed to "2##" for items 3a-c.
- 5) The word "OPERATIONAL" is inserted before the word "CONDITION" in 4.3.7.6.a.1.a) and b). This is consistent with the term "OPERATIONAL CONDITION" as defined in TS 1.28 and is editorial.
- 6) A new footnote (#) is added to 4.3.7.6.b.2 to exempt the SRM channel functional test from the provisions of Specification 4.0.4 for 12 hours when entering Operational Conditions 2*, 3 or 4 from Operational Condition 1.
- 7) Surveillance requirement 4.3.7.6.b.1 is revised to eliminate potential confusion in the present wording. The present wording of 4.3.7.6.b.1 is: "Within 24 hours prior to moving the reactor mode switch from the Shutdown position, if not performed within the previous 7 days". The proposed wording for this surveillance states: "Within 7 days prior to moving the reactor mode switch from the Shutdown position". The proposed wording is equivalent while removing the source of possible confusion. This is an editorial change.

The Commission has provided standards for determining whether a no significant hazards consideration exists as stated in 10CFR50.92(c). A proposed amendment to an operating license involves a no significant hazards consideration 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.

Entergy Operations Inc. has evaluated the no significant hazards considerations in its request for a license amendment. In accordance with 10CFR50.91(a), Entergy Operations Inc. is providing the analysis of the proposed amendment against the three standards in 10CFR50.92(c). A description of the no significant hazards considerations determination follows:

1. No significant increase in the probability or consequences of an accident previously evaluated results from these changes.

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes do not involve a physical change or addition to any plant component or system which could cause the probability of an accident to increase. The proposed changes do not result in

any change to the plant design or its operating modes. Therefore, these proposed changes cannot increase the probability of any accident previously evaluated.

The proposed addition of surveillance requirement 4.3.1.4 and 4.3.6.2, the new footnote for Specification 4.3.7.6.b.2, together with the new footnotes clarifying the specified conditions for operability/surveillance testing, provide for the performance of the associated IRM and SRM surveillances during plant shutdowns following operation in Operational Condition 1. The proposed changes provide a formal means of avoiding a violation of TS 4.0.4 and provide adequate time to avoid the possibility of unnecessary plant scrams, challenges to safety systems, and returning to criticality during a controlled shutdown. Grand Gulf Nuclear Station's Updated Final Safety Analysis Report (UFSAR) Chapter 15 analyses do not rely on the IRM or SRM scram or rod block functions to ensure safety in any accident/transient analysis. Adequate scram protection and neutron monitoring capability are provided by the Average Power Range Monitors (APRM) during the period needed to perform these surveillances. Although UFSAR section 7.1.2.1.4.2 states the IRM system is used to prevent fuel damage resulting from anticipated or abnormal operational transients, no credit is taken for these functions in the accident analysis. Therefore, failure of these functions could not increase the consequences of any accident previously evaluated.

In addition, Generic Letter 87-09 asserted that the assumption that systems and components are inoperable because the surveillance requirement has not been performed is overly conservative. The proposed TS 4.0.4 exceptions provide a method of testing the instrumentation per TS 4.0.3 in order to confirm operability.

The proposed addition of the word "OPERATIONAL" is an editorial change that adds consistency with TS 1.28. The proposed deletion of the 24-hour clause from Specification 4.3.7.6.b, Channel Functional Test requirement for the source range monitors, eliminates the possible confusion caused by the current wording without reducing the effectiveness of these surveillances. The TS, when revised as proposed, will continue to require these Channel Functional Test be performed within seven days prior moving the reactor mode switch from the Shutdown position. These proposed changes do not alter technical requirements of these surveillances.

Based on the above, these proposed changes cannot increase the probability or consequences of any accident previously evaluated.

2. These changes would not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes do not involve a change in the design of any plant system or component, any changes to setpoints, nor do they involve a change in the operation or involve any new modes of operation or testing methods of any plant system or component. As a result, no new failure modes are introduced. Therefore, the

proposed changes do not create the possibility of a new or different type of accident from any accident previously analyzed.

3. These changes would not involve a significant reduction in the margin of safety.

The proposed changes provide adequate assurance that each of the applicable safety functions (scram protection, control rod block, neutron monitoring) are capable of being affected when required. The proposed changes do not modify the actuation setpoints, function or the operation of any plant system; therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above evaluation, operation in accordance with the proposed amendment involves no significant hazards considerations.

E. REFERENCES:

1. Grand Gulf Nuclear Station Final Safety Analysis Report, Updated through Amendment 5, Chapters 7 and 15.
2. Integrated Operating Instruction, 03-1-01-3, Plant Shutdown, Revision 37.
3. Surveillance Procedure, 06-IC-1C51-V-0003, Source Range Monitor Calibration, Revision 27.
4. Surveillance Procedure, 06-IC-1C51-V-0001, Intermediate Range Monitor Calibration, Revision 27.
5. Surveillance Procedure, 06-OP-1C51-V-0001, SRM Channel Functional Test, Revision 29.
6. Surveillance Procedure, 06-OP-1C51-V-0002, IRM Functional Test, Revision 29.
7. GNRI-92/00026 Notice of Violation (NRC Inspection Report 50-416/92-04) dated February 11, 1992.
8. GNRO-92/00029 W. T. Cottle, Entergy Operations to U.S. Nuclear Regulatory Commission dated March 12, 1992.