

From: Lingam, Siva
Sent: Friday, April 3, 2020 4:03 PM
To: Shaw, Jim
Cc: Dixon-Herrity, Jennifer; Wittick, Brian; Colaccino, Joseph; Krepel, Scott; Hsueh, Kevin; Cusumano, Victor; Wagage, Hanry; Karipineni, Nageswara; Pettis, Robert; Dozier, Jerry; Vettori, Robert; Tilton, Caroline; Gaston, Ronald William; Schrage, John
Subject: Grand Gulf - Acceptance Review for the Exigent LAR Associated with One-Time Extension of Appendix J Type A Integrated Leakage Rate Test Frequencies from 11.5 Years to 13.5 Years (EPID L-2020-LLA-0060)

By letter dated March 31, 2020 (Agencywide Documents Access and Management System Accession No. ML20091M363), Entergy Operations, Inc. submitted an exigent license amendment request (LAR) to U.S. Nuclear Regulatory Commission (NRC) to allow for a one-cycle extension to perform the integrated leak rate test (ILRT) and drywell bypass leak rate test (DWBT) from the current Technical Specification (TS) requirement of 11.5 years to 13.5 years for Grand Gulf Nuclear Station, Unit 1 (Grand Gulf). The proposed change would permit the ILRT and DWBT to be performed as specified in TS 5.5.12 "Containment Leakage Rate Testing Program," and TS Surveillance Requirement 3.6.5.1.1, "Drywell," respectively, prior to start-up following RF23, which is scheduled to commence in February 2022. As such, the one-cycle extension of the ILRT and DWBT interval would represent a duration of approximately 13.5 years since the last performance of the ILRT and DWBT on October 19, 2008.

Additionally, Entergy indicated in the application that the proposed change to extend the ILRT and DWBT would enable Entergy to minimize the number of on-site personnel, thus minimizing the potential exposure of both essential (i.e., licensed operators, security personnel, and the emergency response organization) and nonessential personnel to the COVID-19 virus for one-time extension of Appendix J Type A integrated leakage rate test frequencies for Grand Gulf Nuclear Station, Unit 1. Accordingly, the proposed amendment revises TS 5.5.12, "Primary Containment Leakage Rate Testing Program."

Entergy requests approval of the proposed amendment on an exigent basis, pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.91(a)(6) to allow Grand Gulf to resume operation following completion of the current Grand Gulf refueling outage (i.e., RF22), which is scheduled to be completed in mid-April 2020.

The purpose of this e-mail is to provide the results of the NRC staff's acceptance review for the LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate

acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 425 hours to complete. The NRC staff expects to complete this review by April 15, 2020, or earlier. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, or unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1564.

Siva P. Lingam
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