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February 26, 1996

U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Grand Gulf Nuclear Station, Unit 1  
Docket No. 50-416  
License No. NPF-29  
Voluntary Report / Routine Maintenance Renders High Pressure Core Spray EDG  
Inoperable  
LER 96-002-00

GNRO-96/00017

Gentlemen:

Attached is Licensee Event Report (LER) 96-002 which is a Voluntary Report. In the course of preparing this LER, several discussions were held with your staff concerning 10 CFR 50.72 and 50.73 reporting requirements. Our view on reportability is discussed below.

The Emergency Diesel Generator (EDG) associated with the High Pressure Core Spray (HPCS) system is unique in that the Technical Specifications (TS 3.8.1 note) provide flexibility to administratively declare the HPCS system inoperable if the HPCS EDG is inoperable. Once having administratively declared the HPCS system inoperable, operability of the HPCS EDG is no longer necessary, and additional time is available to restore the HPCS EDG to an operable status.

This flexibility (which is present in the improved Technical Specifications and was more explicitly stated in the previous Grand Gulf Technical Specifications) raises an interesting question concerning reportability under 10CFR50.72/73. Although the HPCS system has been administratively declared inoperable for purposes of compliance with TS 3.8.1, the ability of the system to perform its safety function remains intact. Furthermore, the HPCS system continues to meet the Technical Specification definition of operability:

"A system, subsystem, division, component, device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, **normal or emergency electrical power**, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s)."

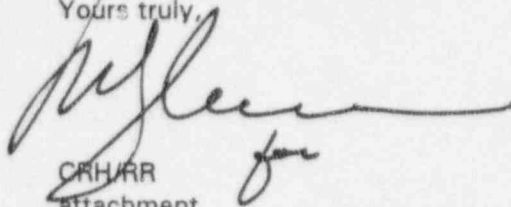
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In applying this definition to the HPCS system which is declared inoperable for administrative purposes, it is necessary to look at the functioning of the HPCS system itself and the relevant support systems, in this case the electrical power systems for HPCS. As noted above, the HPCS system remains capable of performing its safety function. The HPCS EDG is inoperable and therefore cannot fulfill its supporting role. However, the "normal" electrical power system is available for HPCS. Consequently, the HPCS system meets the definition of "operable".

In this situation, when the HPCS system has been administratively declared inoperable for purposes of TS 3.8.1, it does not constitute a failure (i.e., available to perform its safety function) with respect to reportability requirements. Consequently, we do not believe that such a condition meets the conditions for reportability under 10CFR50.72/73.

Yours truly,



CRH/RR  
attachment  
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