



ENTERGY

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C. R. Hutchinson
Vice President
Operations
Grand Gulf Nuclear Station

May 31, 1996

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
Evaluation of No Significant Hazards Consideration for
Request for a Revision to the Reactor Vessel Material
Surveillance Program Schedule

Reference: GNRO-96/00035, Request for a Revision to the Reactor
Vessel Material Surveillance Program Schedule, dated May
2, 1996

GNRO-96/00060

Gentlemen:

By the referenced letter, Entergy Operations, Inc. requested a revision to the Grand Gulf Nuclear Station (GGNS) reactor vessel material surveillance program schedule as required by 10CFR50, Appendix H, Section III.B.3.

Shortly before this letter was submitted, GGNS had become aware of an Atomic Safety and Licensing Board decision issued on October 4, 1995 concerning an amendment request from Perry Nuclear Power Plant. The decision required that changes to the specimen withdrawal schedule be submitted as licensing amendments, including the information required by 10CFR50.91 and 50.92. In consideration of this decision, this letter provides the necessary information.

Attachment 1 is the affirmation as per 10CFR50.30. Attachment 2 is the No Significant Hazards Consideration as per 10CFR50.91 and 50.92. The description and justification for the changes were provided in the referenced letter.

Based on the guidelines in 10CFR50.92, Entergy Operations, Inc. has concluded that this change involves no significant hazards consideration.

In accordance with the provisions of 10CFR50.4, the signed original of the requested change is enclosed.

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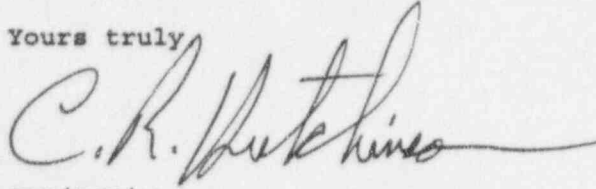
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If you have any questions, please contact Sheri Mahoney at 601-437-6552.

Yours truly



CRH/SBM/mtc

attachments:

1. Affirmation per 10CFR50.30
2. Evaluation of No Significant Hazards Consideration for Request for a Revision to the Reactor Vessel Material Surveillance Program Schedule for Grand Gulf Nuclear Station

cc:

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

Mr. L. J. Callan (w/a)
Regional Administrator
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Mr. J. N. Donohew, Project Manager (w/2)
Office of Nuclear Reactor Regulation
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Mail Stop 13H3
Washington, D.C. 20555

Dr. E. F. Thompson (w/a)
State Health Officer
State Board of Health
P. O. Box 1700
Jackson, Mississippi 39205

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

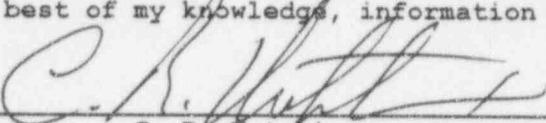
LICENSE NO. NPF-29

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 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.


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 31 day of May, 1996.

(SEAL)


Notary Public

My commission expires:

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

Attachment 2

Evaluation of No Significant Hazards Consideration
for Request for a Revision to the Reactor Vessel
Material Surveillance Program Schedule
for Grand Gulf Nuclear Station

NO SIGNIFICANT HAZARDS CONSIDERATION

Entergy Operations, Inc. proposes to change the withdrawal schedule for the reactor vessel material surveillance capsules. The revised schedule for withdrawal of the surveillance capsules is withdrawal of the first capsule at 24 Effective Full Power Years. The withdrawal schedule for the second capsule is to be determined at a later date. The third capsule which was withdrawn on May 7, 1995 is to be returned to the reactor vessel during Fall, 1996 outage and retained as a standby.

The Commission has provided standards for determining whether a no significant hazards consideration exists as stated in 10CFR50.92(c). A proposed change 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 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.

In consideration of the October 4, 1995 decision of the Atomic Safety and Licensing Board concerning an amendment request from Perry Nuclear Power Plant, Entergy Operations, Inc. has evaluated the no significant hazards consideration in its request for a change to the withdrawal schedule required by 10CFR50, Appendix H, and determined that no significant hazards consideration results from this change. In accordance with 10CFR50.91(a), Entergy Operations, Inc. is providing the following analysis of the proposed changes against the three standards in 10CFR50.92(c):

- A) The proposed change does not significantly increase the probability or consequences of an accident previously evaluated.

The change revises the withdrawal schedule for the reactor vessel material surveillance capsules and returns a withdrawn capsule to the reactor vessel. The capsules are not an initiator of any previously analyzed accident. The withdrawal or return of the surveillance capsules does not affect the probability or consequences of any previously analyzed accident. Extending the time for withdrawal of the first capsule and returning the withdrawn capsule to the vessel do not adversely affect the pressure temperature limit curves for the reactor vessel. Regulatory Guide 1.99 is currently used to prepare the pressure temperature limit curves and is inherently conservative for boiling water reactors (BWRs). The current pressure temperature limit curves will continue to be adhered to. Additionally, Grand Gulf Nuclear Station (GGNS) participates in the supplemental test program designed to significantly increase the amount of BWR surveillance data. This program will be used to complement the GGNS surveillance program such that postponement of the capsule withdrawals will have minimal impact on the understanding of irradiation effects on the GGNS vessel.

Therefore, the proposed change does not significantly increase the probability or consequences of an accident previously evaluated.

- B) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Returning the withdrawn capsule to the vessel and postponing the withdrawal of the first capsule do not contribute to the possibility of a new or different kind of accident or malfunction from those previously analyzed. Failure of the reactor vessel is not a credible accident since the vessel itself is a highly reliable component. This change does not affect that determination. The potential for reactor vessel cracking will be adequately assessed by the proposed withdrawal schedule. In addition, the results from the supplemental test program will provide indication of the condition of the vessel until the data from the first GGNS capsule are available. The proposed change provides the same level of confidence in the integrity of the vessel. The pressure temperature curves are currently controlled by the Technical Specifications and are determined using the conservative methodology in Regulatory Guide 1.99. Therefore, the possibility of failure of the reactor vessel is not increased. The proposed change does not involve a change in the design of the plant. The current pressure temperature limit curves are inherently conservative and will continue to be adhered to.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- C) The proposed change does not involve a significant reduction in a margin of safety.

The current pressure temperature limit curves are inherently conservative and provide sufficient margin to ensure the integrity of the reactor vessel. The changes do not adversely affect these curves. The supplemental test program will be used to complement the GGNS surveillance program such that postponement of the capsule withdrawals will have minimal impact on the understanding of irradiation effects on the GGNS vessel. The capsules removed in 1996 as part of the supplemental program will have a fluence higher than the 25% of the design life fluence used in establishing the original GGNS schedule; therefore, the use of the supplemental test program results will meet the intent of the original test schedule.

Therefore, the proposed change does not result in a significant reduction in a margin of safety.

Based on the above evaluation, Entergy Operations, Inc. has concluded that operation in accordance with the proposed change involves no significant hazards consideration.