



ENTERGY

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September 14, 1992

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Vice President
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U.S. Nuclear Regulatory Commission
Mail Station PI-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Removal of Component Lists from Technical Specifications in
Accordance with Generic Letter 91-08
Proposed Amendment to the Operating License (PCOL-91/17)

GNRO-92/00117

Gentlemen:

In accordance with NRC guidance provided in Generic Letter 91-08, Entergy Operations, Inc. has developed a proposed change to the Operating License to remove lists of plant components from the Technical Specifications (TS). This involves deletion and revision of various TS tables, as well as changes to the wording of several of the Specifications and Bases as recommended by the Generic Letter. The lists being removed from the TS will be incorporated into plant procedures subject to the administrative controls of TS 6.8 and 6.5.3 prior to implementation of the amendment. This information will also be added to the Updated Final Safety Analysis Report. These controls ensure that the quantity and accuracy of this information is properly maintained.

The proposed changes will delete the following tables: Table 3.6.4-1, "Containment and Drywell Isolation Valves"; Table 3.6.6.2-1, "Secondary Containment Ventilation System Automatic Isolation Dampers/Valves"; Table 3.8.4.1-1, "Primary Containment Penetration Conductor Overcurrent Protective Devices"; and, Table 3.8.4.2-1, "Motor Operated Valves Thermal Overload Protection." The proposed changes also revise Table 3.3.2-1, "Isolation Actuation Instrumentation." For Generic Letter 91-08 guidance, appropriate wording changes are also made to the affected TS. These changes ensure that the scope of each TS remains clear, and that footnotes and other special TS provisions are preserved.

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In accordance with the provisions of 10CFR50.4, the signed original of the requested amendment is enclosed. Attachment 2 provides the technical justification and discussion to support the requested amendment.

This proposed amendment has been reviewed and accepted by the Plant Safety Review Committee and the Safety Review Committee.

Based on the guidelines presented in 10CFR50.92, Entergy Operations has concluded that this proposed amendment involves no significant hazards considerations.

Yours truly,



WTC/BSF

attachments:

1. Affirmation per 10CFR50.30
2. GGNS PCOL-91/17
3. Mark-up of Affected Technical Specification Pages
4. Sample Proposed Technical Specification Pages

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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 before me, a Notary Public, in and for the County and State above named, this 14 day of September 1992.

(SEAL)

Patricia Blagbogan
Notary Public

My commission expires:

My Commission Expires July 1, 1994

A. SUBJECT

1. PCOL-91/17 Removal of Component Lists from Technical Specifications in Accordance with the Guidance of Generic Letter 91-08
2. Affected Technical Specifications:
 - a. Definition 1.10, Drywell Integrity, Page 1-2
 - b. Definition 1.31, Primary Containment Integrity, Page 1-6
 - c. Definition 1.38, Secondary Containment Integrity, Page 1-7
 - d. Table 3.3.2-1, Isolation Actuation Instrumentation, Pages 3/4 3-10 through 3/4 3-15
 - e. Table 3.3.2-3, Isolation System Instrumentation Response Time, Page 3/4 3-21
 - f. Surveillance Requirement 4.6.1.1, Primary Containment Integrity, Page 3/4 6-1
 - g. Specification 3/4.6.1.2, Containment Leakage, Pages 3/4 6-2, 6-3 and 6-4
 - h. Surveillance Requirement 4.6.2.1, Drywell Integrity, Page 3/4 6-13
 - i. Specification 3/4.6.4, Containment and Drywell Isolation Valves, Pages 3/4 6-28 and 3/4 6-29
 - j. Table 3.6.4-1, Containment and Drywell Isolation Valves, Pages 3/4 6-30 through 3/4 6-45
 - k. Specification 3/4.6.6.2, Secondary Containment Automatic Isolation Dampers/Valves, Page 3/4 6-49
 - l. Table 3.6.6.2-1, Secondary Containment Ventilation System Automatic Isolation Dampers/Valves, Pages 3/4 6-50 through 3/4 6-54
 - m. Specification 3/4.8.4.1, Primary Containment Penetration Conductor Overcurrent Protective Devices, Pages 3/4 8-19 and 8-20
 - n. Table 3.8.4.1-1, Primary Containment Penetration Conductor Overcurrent Protective Devices, Pages 3/4 8-21 through 3/4 8-45
 - o. Specification 3/4.8.4.2, Motor Operated Valves Thermal Overload Protection, Page 3/4 8-46

- p. Table 3.8.4.2-1, Motor Operated Valves Thermal Overload Protection, Pages 3/4 8-47 through 8-53
- q. Bases 3/4.6.4, Containment and Drywell Isolation Valves, Page B 3/4 6-7
- r. Bases 3/4.6.6, Secondary Containment, Page B 3/4 6-8a
- s. Bases 3/4.8.4, Electrical Equipment Protective Devices, Page B 3/4 8-3

B. DISCUSSION

1. GGNS is requesting revisions to the Technical Specifications (TS) and TS Tables listed in A.2 above. These revisions follow the guidance provided in Generic Letter (GL) 91-08, "Removal of Component Lists from Technical specifications." The information removed from the TS Tables will be incorporated into plant procedures and the Updated Final Safety Analysis Report (UFSAR) subject to appropriate change controls. The specific revisions being requested are described below.
2. The revisions proposed for TS Table 3.3.2-1 involve the deletion of information cross-referencing the isolation actuation instrumentation to TS Table 3.6.4-1, which will be deleted. This requires removal of one column from the table, as well as deletion of several informational footnotes. This information will be contained in plant procedures. Note that the special operability provisions associated with isolation of valves E12-F008 and E12-F009 during Operational Conditions 4 and 5 are retained as Footnote (c).
3. TS Table 3.3.2-3 is revised to remove references to isolation times currently contained in Tables 3.6.4-1 and 3.6.6.2-1, which will be deleted. These times will be relocated to plant procedures.
4. Surveillance Requirements 4.6.1.1.b and 4.6.2.1.a are modified to remove references to Table 3.6.4-1, while preserving provisions allowing certain valves to be opened intermittently under administrative controls.
5. Footnotes (#) and (*) of TS 3/4.6.1.2 are being revised to remove references to Table 3.6.4-1 for valves subject to Type B and C leakage tests.
6. TS 3/4.6.4 is revised as follows:
 - a. All references to Table 3.6.4-1 are removed. This table is being deleted.

- b. Limiting Condition of Operation (LCO) 3.6.4 is revised to remove reference to required valve isolation times. Isolation times will be controlled by plant procedures along with other information from Table 3.6.4-1. The isolation times will continue to be verified per the requirements of TS 4.0.5 (Inservice Testing).
 - c. Footnote (***) is added to LCO 3.6.4 to identify that normally closed or locked closed containment and drywell isolation valves are permitted to be opened under administrative control. The addition of this footnote follows the guidance of GL 91-08. The wording of this footnote is modified from that suggested in GL 91-08 to the wording currently contained in Table 3.6.4-1 Footnote (g).
 - d. Footnote (#) is revised to remove reference to Table 3.6.4-1. The association between isolation instrumentation and valve group will be contained in plant procedures (see B.2 above).
 - e. Surveillance Requirements 4.6.4.1, 4.6.4.2, and 4.6.4.3 are changed to refer to containment and drywell isolation valves instead of Table 3.6.4-1 as recommended by GL 91-08.
 - f. Footnote (##) is added. This footnote preserves the provisions of current Footnote (*) of Table 3.6.4-1 which clarifies surveillance requirements for automatic main steam line valves relative to the provisions of Specification 4.0.4.
7. Table 3.6.4-1 is deleted in its entirety. The information from Table 3.6.4-1 will be relocated to plant procedures, and will include the pressure testing methods used for isolation valves. This information is currently reflected in Footnotes (c), (d) and (e) of TS Table 3.6.4-1. The relocation will also include valves identified by component designator and valve group, required isolation times, penetration data, and appropriate cross references. Footnotes (g) and (*) are retained as described above (see B.6.c and D.6.1).
8. TS 3/4.6.6.2 is revised to remove all references to Table 3.6.6.2-1, which is being deleted. Also, since isolation times, as part of the deletion of Table 3.6.6.2-1, will be relocated to plant procedures, reference to them is deleted. While Generic Letter 91-08 did not contain precise guidance on revisions to secondary containment TS, the recommendations provided for primary containment are appropriate for secondary containment as well.
9. TS Table 3.6.6.2-1 is deleted in its entirety. Information in the table concerning secondary containment isolation valve/ damper functions, designators, and maximum isolation times will be relocated to plant procedures as previously described.

10. Bases 3/4.6.4 and 3/4.6.6 are revised to include reference to the location of the isolation valve tables which are being removed from the TS. Both of these changes are recommended by GL 91-08.

Bases 3/4.6.4 is also revised, as recommended in GL 91-08, to include a clarification of those actions which constitute administrative controls for locked or sealed closed valves opened as allowed by LCO 3/4.6.4. The wording of this bases statement is modified from that recommended in GL 91-08. The wording of the bases insert recommended by GL 91-08 would have only allowed an "operator" to be stationed at an opened valve to close the valve in the event of an accident. The proposed bases insert allows an "individual" to be stationed at an opened valve to close the valve in the event of an accident. The modified bases statement provides greater flexibility to allow a reduction in personnel requirements and personnel dose while providing equivalent protection. Also, this bases statement was clarified to apply to the opening of manual valves which results in an open penetration. This clarification is in accordance with the guidance of GL 91-08 since it ensures that this bases statement is applied to those valves whose design includes positive control features to ensure they are maintained closed and are required to isolate the penetration.

11. TS 3/4.8.4.1, Primary Containment Penetration Conductor Overcurrent Protective Devices, is revised as follows:
 - a. All references to Table 3.8.4.1-1 are removed. This table is being deleted.
 - b. The wording of the LCO and Surveillance Requirements is modified to provide an appropriate description of the scope of the protective devices to which the requirements apply. Wording is consistent with that recommended in GL 91-08. The wording recommended in GL 91-08 is modified slightly to identify that the applicable overcurrent protective devices are all circuit breakers. This wording change is made to avoid confusion concerning the applicability of this specification. As discussed in section 8.3.1.2.3.1 of the UFSAR, devices other than circuit breakers in some cases are used to provide backup overcurrent protection. This change in the wording recommended in the Generic Letter is consistent with the current scope of Table 3.8.4.1-1 and the bases statement for this specification.
12. Table 3.8.4.1-1 is deleted in its entirety. Information in the table will be relocated to plant procedures. This includes required circuit breakers by component designator, voltage level, and type; affected component/system; and, required current trip setpoints and response times.

13. TS 3/4.8.4.2, Motor Operated Valves Thermal Overload Protection, is revised to remove all references to Table 3.8.4.2-1, which is being deleted. LCO wording is modified accordingly to describe the scope of motor overload protection devices to which the LCO requirements apply. This wording is consistent with the bases statement for this specification and incorporates the recommendations of GL 91-08 while preserving the plant specific features of the GGNS LCO.
14. Table 3.8.4.2-1 is deleted in its entirety. The information will be relocated into plant procedures.
15. Bases 3/4.8.4 is being revised to reference plant procedures for lists of the required motor operated valve (MOV) thermal overload protection devices and the electrical penetration protective circuit breakers and their required response times and trip setpoints.
16. TS Definitions 1.10, 1.31, and 1.38 are modified consistent with the guidance of GL 91-08 as follows:
 - a. Remove references to the deleted tables from the definitions of Drywell Integrity, Containment Integrity, and Secondary Containment Integrity.
 - b. Add a statement to both 1.10.a.2 and 1.31.a.2 identifying that valves may be opened under administrative controls while maintaining Drywell or Containment Integrity. This is consistent with other changes made to TS 3/4.6.1.1, Primary Containment Integrity, and TS 3/4.6.2.1, Drywell Integrity (see B.4 and B.6.c above) and GL 91-08.

C. JUSTIFICATION

1. The proposed TS changes follow the explicit guidance and recommendations of USNRC Generic Letter 91-08. Minor variations in the wording recommended in GL 91-08 are described in Section B and are only those necessary to accommodate the plant specific features.
2. The TS revisions proposed herein involve no substantive changes to the surveillance and operability requirements currently contained in the GGNS TS. Deletion of TS tables is complemented by the incorporation of that information into plant procedures. Changes to the TS and Bases language serve only to clarify the scope of the equipment covered by the Specifications as directed by the Generic Letter. These changes therefore constitute an administrative revision only.

3. The relocation of the TS tables into plant procedures removes an administrative burden from GGNS and the NRC by no longer requiring that a license amendment be sought solely to change component information in the affected TS tables. This information will be adequately controlled via the administrative requirements specified in TS 6.8 and TS 6.5.3. Those requirements include review of changes for unreviewed safety questions in accordance with the provisions of 10CFR50.59. Such changes are reported to the NRC in the annual report submitted pursuant to 10CFR50.59. GGNS adheres to a policy of verbatim compliance with all plant procedures.
4. Other plant documents which may also contain lists of the affected components, such as the UFSAR, will be updated per their particular requirements and controls when appropriate.

D. NO SIGNIFICANT HAZARDS CONSIDERATION

With this proposed amendment Entergy Operations, Inc. is requesting revisions to the Grand Gulf Nuclear Station (GGNS) Technical Specifications (TS) to delete certain tables containing lists of plant components. The proposed changes will also modify the wording of various TS and Bases to reflect the deletion of the component tables. This is being done in a manner consistent with the guidance and recommendations of Generic Letter 91-08.

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 no significant hazards 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.

GGNS has evaluated the no significant hazards considerations in its request for a license amendment. In accordance with 10CFR50.91(a), GGNS is providing the following analysis of the proposed amendment against the three standards in 10CFR50.92:

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

The proposed changes would result in the revision or deletion of specified tables from the Technical Specifications (TS), as well as modification of TS and Bases wording as recommended by Generic Letter (GL) 91-08. The tables to be deleted list plant components required to function to mitigate the consequences of accidents and/or protect other plant equipment needed to perform this function. The component lists affected are: Containment and Drywell Isolation Valves (Table 3.6.4-1); Secondary Containment Ventilation System Automatic Isolation Dampers/Valves (Table 3.6.6.2-1);

Primary Containment Penetration Conductor Overcurrent Protective Devices (Table 3.8.4.1-1); and, Motor Operated Valves Thermal Overload Protection (Table 3.8.4.2-1). In addition, Tables 3.3.2-1 and 3.3.2-2, along with the wording of the several TS Definitions, Limiting Conditions for Operation (LCOs), Surveillance Requirements, and Bases are modified to reflect administrative changes resulting from removal of specific references to the deleted component table.

Surveillance and operability requirements are incorporated into the TS to ensure that these components are available to perform their design functions. The restrictions and actions imposed by these requirements are not being relaxed or revised by the proposed changes in any way. The only changes made to the language of the TS are those recommended by GL 91-08 to ensure that the scope of each specification is clear and any plant specific features are retained. Accident analyses which rely on these components are not affected. There will be no modifications to plant equipment as a result of the proposed changes. Plant procedures will be revised only as necessary to reflect relocation of the table information. Any changes to the component information moved to plant procedures will be accomplished in accordance with the administrative controls required by TS 6.8 and 6.5.3. These controls ensure that there will be no increase in the probability or consequences of previously evaluated accidents without prior NRC approval.

Therefore, no significant increase in the probability or consequences of an accident previously evaluated results from these changes.

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

The relocation of information from TS tables into plant procedures serves only to consolidate information on affected components outside of the TS for control under appropriate administrative requirements. This is done in accordance with the guidance of GL 91-08. The proposed revisions to the TS do not involve a change in the manner in which these components will be operated, maintained, or monitored. No components or systems are physically added, removed, or modified as a result of the proposed changes.

Therefore, the possibility of a new or different kind of accident from any previously analyzed is not created.

3. This change would not involve a significant reduction in the margin of safety.

The proposed revisions are being requested as a line item improvement to the Grand Gulf Nuclear Station (GGNS) TS to reduce the administrative burden on the NRC and GGNS when revisions to the subject component information becomes necessary. They are consistent with the guidance of GL 91-08. The margin of safety associated with these component lists is unaffected by this proposed change since the operability and surveillance requirements applicable to these components are not being revised except administratively as recommended by the Generic Letter. In addition, the incorporation of this information into plant procedures and the Updated Final Safety Analysis Report ensures that changes made to the information are reviewed in accordance with the controls of TS 6.8 and 6.5.3, which allow no decrease in the margin of safety without prior NRC approval.

Therefore, the proposed change will not involve a significant reduction in the margin of safety.

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