



September 30, 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
Technical Specification Refueling Equipment Interlocks' Required Actions
Additional Information
Proposed Amendment to the Operating License

REFERENCE: GNRO-96/00062 and RBG-42764, Technical Specification Refueling
Equipment Interlocks' Required Actions Proposed Amendment to the
Operating License, dated May 31, 1996.

GNRO-96/00112

Gentlemen:

Entergy Operations, Inc. is providing by this letter additional information concerning a proposed amendment to the Grand Gulf Nuclear Station (GGNS) Operating License. The proposed change adds additional acceptable Required Actions to Technical Specification Limiting Condition for Operation (LCO) 3.9.1, "Refueling Equipment Interlocks." The additional Required Actions provide an alternate method to compensate for inoperable refueling interlocks instead of suspending fuel movement. The proposed change provides the same level of safety as the current requirements. In the referenced letter we requested that NRC Staff complete its review and approval by October 1, 1996 to support GGNS' October 1996 refueling outage.

During discussions the Staff requested that we perform a risk informed comparison of the current Technical Specification operability requirements and the proposed Required Actions. We understand that this was the only question arising from the technical review of this change. Therefore, GGNS has developed an event tree based evaluation of the current Technical Specification operability requirements and the proposed Required Actions.

The event tree comparison used GGNS specific procedure and refueling practices, in conjunction with expected human performance and equipment failure rates to develop the events included in the event trees. The evaluation focused on the difference between the current barriers and the barriers that will be implemented in accordance with the proposed change. The evaluation resulted in two key insights: 1) the number of barriers preventing the undesirable action is not decreased by the proposed change, and 2) that the probability of the

undesirable outcome is essentially the same (within the uncertainties of the evaluation). These evaluation results are consistent with the qualitative evaluation of the proposed change provided in the referenced document.

On September 19, 1996 representatives of GGNS familiar with the requested change were in Washington DC for another meeting. They took the opportunity discuss with members of the Staff the request for a risk informed comparison to ensure that the evaluation performed met the needs of the Staff. During this discussion the Staff indicated that regardless of the technical justification for the change the plant specific submittal would not be approved because of the change was generic in nature. Due to this new Staff position the event tree evaluation was not discussed.

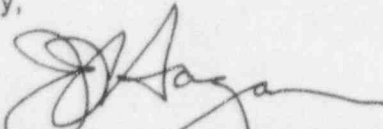
Simply put, we understand that the Staff will not perform reviews of plant specific submittals if they believe that the proposed change could be applied to other plants. At some level, virtually all Technical Specification changes are generic, and at another level, virtually all Technical Specification changes are plant-specific - the determination is in the eye of the beholder. Unfortunately, extended to its logical conclusion, the Staff position would prohibit individual facilities from making most changes to the Technical Specifications if that facility had implemented the improved Standard Technical Specifications.

It is our belief that the Staff reluctance to proceed with this change is due to a concern over limited Staff review resources. If true, there are a couple of points worth emphasizing. First of all, the technical review branch responsible did not see any technical barriers to the acceptability of the requested change. More importantly, the new Staff position presents a major disincentive for licensees to convert to the improved Standard Technical Specifications. Considering the NRC's persistent stress on voluntary implementation of the improved Technical Specifications, we believe that the Staff has an obligation to continue the timely processing and approval of technically acceptable changes to the plant-specific implementations of improved Standard Technical Specifications. Furthermore, following approval of the initial requested change, we believe that the Staff should continue its longstanding policy of generating a generic change, if appropriate, through the generic letter process.

Also, we would like to take this opportunity to point out that the proposed Required Actions increase consistency within the Technical Specifications with respect to the Required Actions for LCO 3.9.4, "Control Rod Position Indication." LCO 3.9.4 controls the operability of the control rod position indicators which is a support system for the refueling interlocks controlled by LCO 3.9.1 since the position indicators provide information to the all-rods-in interlock. LCO 3.9.4 requires that when one or more control rods do not have the required position indication operable that all insertable control rods be inserted and fuel movement and control rod withdrawal be suspended (Required Actions A.1.1, A.1.2, and A.1.3) or that the associated control rod(s) be inserted and disarmed (Required Actions A.2.1 and A.2.2). If Required Actions A.2.1 and A.2.2 are complied with then refueling activities can continue. The proposed Required Actions are consistent with current Required Actions of LCO 3.9.4 in that they require either fuel movement be suspended or control rod withdrawal be blocked and that all control rods required to be inserted be verified to be inserted.

The information provided in this letter does not affect the bases for Entergy Operations conclusion that this proposed amendment involves no significant hazards considerations as previously provided.

Yours truly,



Vice President, Operations Grand Gulf Nuclear Station
/BSF

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