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JOHN R. McGAHA, JR.  
Vice President  
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October 24, 1996

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-37  
Washington, DC 20555

Subject: River Bend Station - Unit I  
Docket No. 50-458  
License No. NPF-47  
License Amendment Request (LAR) 96-46, Change to Technical Specifications  
3.8.1, "A. C. Sources - Operating"

File Nos.: G9.5, G9.42

RBEXEC-96-154  
RBF1-96-0361  
RBG-43243

Gentlemen:

In accordance with 10 CFR 50.90, Entergy Operations, Inc. (EOI) hereby applies for amendment of Facility Operating License No. NPF-47, Appendix A - Technical Specifications, for River Bend Station (RBS). This request consists of a proposed change to Technical Specifications 3.8.1, "A. C. Sources - Operating".

This submittal proposes to remove accelerated testing requirements for the standby diesel generators as advised by NRC Generic Letter (GL) 94-01. The proposed changes to the Technical Specifications reflect the Model Technical Specification Changes proposed in Enclosure 2 of GL 94-01. Additionally, the model Technical Specification changes included within Generic Letter 94-01 allow deletion of the special diesel generator reporting requirements that had previously been included as River Bend TS 4.8.1.1.3. Upon implementation of the Improved Technical Specifications (ITS) at RBS, the diesel generator reporting requirements were relocated to the Technical Requirements Manual (TRM). Upon approval of this amendment, EOI intends to delete the diesel generator reporting requirements consistent with the guidance of GL 94-01 using the provisions of 10 CFR 50.59.

A Note of Affirmation is contained in Attachment 1 of this letter. Attachment 2 provides a description of the proposed changes and the associated justification (including a Basis for No

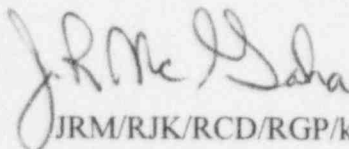
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RBF1-96-0361  
RBEXEC-96-154  
RBG-43243  
October 24, 1996  
Page 2 of 2

Significant Hazards Consideration). A marked-up copy of the affected pages from the RBS Technical Specifications (ITS) is provided in Attachment 3. The applicable marked-up Bases pages are included for your information.

This request has been reviewed and approved by the RBS Facility Review Committee and the Nuclear Review Board. If you have any questions regarding this request or require additional information, please contact Tim Gates at (504) 381-4866.

  
JRM/RJK/RCD/RGP/kvm  
attachments

cc: U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

NRC Senior Resident Inspector  
P. O. Box 1050  
St. Francisville, LA 70775

Mr. David L. Wigginton  
U.S. Nuclear Regulatory Commission  
M/S OWFN 13-H-15  
Washington, DC 20555

Louisiana Department of Environmental Quality  
Radiation Protection Division  
P. O. Box 82135  
Baton Rouge, LA 70884-2135  
ATTN: Administrator

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

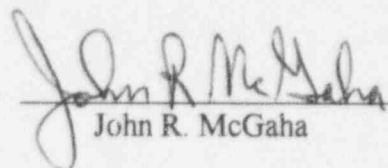
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LICENSE NO. NPF-47  
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DOCKET NO. 50-458  
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IN THE MATTER OF  
  
ENTERGY GULF STATES, INC.  
  
CAJUN ELECTRIC POWER COOPERATIVE AND  
  
ENTERGY OPERATIONS, INC.

\_\_\_\_\_  
AFFIRMATION  
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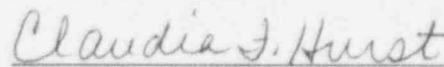
I, John R. McGaha, state that I am Vice President - Operations of Entergy Operations, Inc. at River Bend Station; that on behalf of Entergy Operations, Inc., I am authorized by Entergy Operations, Inc., to sign and file with the Nuclear Regulatory Commission, this River Bend Station License Amendment Request (LAR) 96-46, Change to Technical Specifications 3.8.1, "A. C. Sources - Operating," that I signed this letter as Vice President - Operations at River Bend Station for Entergy Operations, Inc.; and that the statements made and the matters set forth herein are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
John R. McGaha

STATE OF LOUISIANA  
PARISH OF WEST FELICIANA

SUBSCRIBED AND SWORN TO before me, a Notary Public, commissioned in the Parish above named, this 24<sup>th</sup> day of October, 1996.

(SEAL)

  
\_\_\_\_\_  
Claudia F. Hurst  
Notary Public

**ENTERGY OPERATIONS, INC.  
RIVER BEND STATION  
DOCKET 50-458/LICENSE NO. NPF-47  
LICENSE AMENDMENT REQUEST 96-46**

**Licensing Document Involved**

This proposed change affects the following Technical Specification sections:

3.8.1	A. C. Sources - Operating
B 3.8.1	Bases - A. C. Sources - Operating

**Background**

The standby diesel generator systems consists of three independent, AC power sources. The diesel generator system is designed so that with loss of any one of three diesel generators, the remaining generators are capable of supplying power to sufficient equipment for a safe shutdown of the unit under normal or accident conditions.

The Divisions I and II standby diesel generators are used to supply power to their respective safety buses when the offsite power system is unavailable. They are automatically started upon a loss of voltage on its associated 4160 VAC bus, or by a LOCA signal initiated by an abnormally low reactor vessel water level or high drywell pressure. If offsite power is available to the buses during a LOCA initiation the diesel generators are not automatically connected to the buses but are left running on standby. If offsite power is not available, the required loads are automatically sequenced onto the diesel generators.

The Division III (HPCS) diesel generator is used to supply power to the HPCS safety bus when offsite power is not available. It starts automatically on a LOCA signal from the plant protection system or on a HPCS supply bus undervoltage condition and is automatically connected to the bus when offsite power is not available.

Technical Specification Surveillance Requirements 3.8.1.2 and 3.8.1.3 require that in accordance with the frequency specified in Table 3.8.1-1, "Diesel Generator Test Schedule," (Shown in ITS marked-up pages of Attachment 3.) each standby diesel generator be verified to start from standby conditions and achieve rated voltage and speed within the specified time limits. The frequency specified for the verification is nominally 31 days, which decreases to every 7 days should a standby diesel generator experience four or more valid failures in the last twenty-five valid tests. Four valid failures in the last twenty-five valid tests is considered the threshold for acceptable reliability, and hence the test provides an early indication of degrading standby diesel generator reliability.

### **Description of Proposed Changes**

Consistent with the guidance provided by NRC GL 94-01, this amendment request proposes that the provisions in Technical Specification 3.8.1 for accelerated testing be removed. This follows implementation of the required maintenance program for monitoring and maintaining diesel generator performance consistent with the provisions of Section 50.65 of Title 10 of the Code of Federal Regulations (10 CFR 50.65), "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and the guidance (as applicable to EDGs) of Regulatory Guide (RG) 1.160 Revision 1, dated January 1995, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Specifically, three changes to the applicable diesel generator Technical Specifications are proposed: 1) SR 3.8.1.2 specified frequency is changed to 31 days; 2) SR 3.8.1.3 specified frequency is changed to 31 days; and 3) Table 3.8.1-1 "Diesel Generator Test Schedule" is deleted.

### **Justification for Proposed Changes**

Generic Letter (GL) 94-01 advises licensees that they may request a license amendment to remove accelerated testing requirements for the standby diesel generators from their Technical Specifications. GL 94-01 states, "Licensees may request the removal of the TS provisions for accelerated testing and special reporting requirements for EDGs at this time. However, when requesting this license amendment, licensees must commit to implement within 90 days of the issuance of the license amendment a maintenance program for monitoring and maintaining EDG performance consistent with the provisions of 10 CFR 50.65 and the guidance (as applicable to EDGs) of RG 1.160. The monitoring performed per 10 CFR 50.65 assures the standby diesel generator reliability and unavailability are maintained within acceptable limits. River Bend Station will comply with the guidelines as set forth in GL 94-01 and is already in compliance with the provisions of 10 CFR 50.65 and the guidance of RG 1.160 by implementation of the Maintenance Rule on July 10, 1996. Therefore, the changes proposed in this amendment request are consistent with the guidance provided by NRC GL 94-01.

### **No Significant Hazards Consideration**

Entergy Operations Inc., (EOI) proposes to change the current River Bend Station (RBS) Technical Specifications (TS) so that the requirements for accelerated testing are removed. This follows implementation of the required maintenance program for monitoring and maintaining diesel generator performance consistent with the provisions of 10 CFR 50.65 and the guidance as applicable to diesel generators of RG 1.160.

In accordance with 10 CFR 50.92, a proposed change to the operating license involves no "significant hazards" if operation of the facility, in accordance with the proposed change, would not 1) involve a significant increase in the probability or consequences of any accident previously evaluated, 2) create the possibility of a new or different kind of accident from previously evaluated, or 3) involve a significant reduction in a margin to safety. This request is evaluated against each of these criteria as follows:



1. *This request does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

This change will provide flexibility to structure the standby diesel generator maintenance program based on the risk significance of the structures, systems, and components that are within the scope of the Maintenance Rule. The removal of the diesel generator accelerated testing is acceptable as the maintenance rule applies site and system specific performance criteria to monitor diesel generator performance. This criteria includes a running availability and reliability goal as well as specific goals to monitor maintenance preventable functional failures. The performance criteria for the diesel generator reliability and unavailability established by the maintenance rule and the causal determinations and corrective actions required for maintenance preventable functional failures are considered to be an acceptable method for monitoring diesel generator performance.

The proposed change has no effect on the probability of the initiation of an accident, because the emergency diesel generators do not serve as the initiator of any event. Additionally, as diesel generator performance will continue to be assured by the maintenance rule, the proposed changes do not affect the ability to mitigate the consequences of an accident previously evaluated. The changes do not impact the diesel's design sources, operating characteristics, system functions, or system interrelationships. The failure mechanisms for the accidents previously analyzed are not affected and no additional failure modes are created that could cause an accident that has been previously evaluated. Since the diesel generator performance and reliability will continue to be assured by the maintenance rule, the proposed changes cannot involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *This request does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

This proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that could contribute to the initiation of any accidents. The proposed changes only affect the methods used to monitor and assure diesel generator performance. The performance criteria for both the diesel generator reliability and unavailability established by the maintenance rule, and the causal determinations and corrective actions required for maintenance preventable functional failures, is considered by GL 94-01 to be an acceptable method for monitoring diesel generator performance.

No SSC, method of operating, or system interface is altered by this change. The changes do not impact the diesel's design sources, operating characteristics, system

functions, or system interrelationships. The failure mechanisms for the accidents are not affected, and no additional failure modes are created. Because the diesel generator performance and reliability will continue to be assured by the maintenance rule, the proposed changes cannot create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *This request does not involve a significant reduction in a margin to safety.*

The proposed changes only affect the methods used to monitor and assure diesel generator performance and reliability. The performance criteria for both the diesel generator reliability and unavailability established by the maintenance rule, and the causal determinations and corrective actions required for maintenance preventable functional failures, is considered by GL 94-01 to be an acceptable method for monitoring diesel generator performance. No margin to safety as defined in the basis for any technical specification is impacted by these changes. This change does not impact any uncertainty in the design, construction, or operation of any SSC. Diesel generator response to accident initiators is unchanged. No SSC, method of operating, or system interface is altered by this change. The changes do not impact the diesel's design sources, operating characteristics, system functions, or system interrelationships. Because the diesel generator performance and reliability will continue to be assured by the maintenance rule, the proposed changes cannot involve a significant reduction in the margin to safety.

#### **Environmental Impact Consideration**

EOI has reviewed this request against the criteria of 10CFR51.22 for environmental considerations. Since this request involves (i) no significant hazards consideration, (ii) no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and (iii) no significant increase in individual or cumulative occupational radiation exposure, EOI has concluded that the proposed change meets the criteria given in 10CFR51.22 (c)(9) for a categorical exclusion from the requirement for an environmental impact statement.

#### **Notification of State Personnel**

A copy of this amendment request has been provided to the State of Louisiana, Department of Environmental Quality - Radiation Protection Division.

**ATTACHMENT 3**

**Marked-up ITS Pages**