



GULF STATES UTILITIES COMPANY

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August 9, 1985
RBG - 21823
File No. G9.5

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1
Docket No. 50-458

As requested by your Staff in a letter dated July 25, 1985, Gulf States Utilities is providing a summary discussion of long term revisions for the River Bend Station Technical Specifications which are currently under consideration and may be pursued in the future. These revisions are considered enhancements to improve operational flexibility within the approved safety analyses and do not affect the certification provided today by separate correspondence.

Sincerely,

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

JEB/ERG/kt

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RIVER BEND TECHNICAL SPECIFICATIONS
ENHANCEMENT ITEMS

1. Page 3/4 1-7

- a. Make changes indicated on marked-up page 3/4 1-7.
- b. These changes will provide clarity of intent.

2. Page 3/4 1-13

- a. Delete ACTION statement 3.a.2.
- b. This change will delete an ACTION requirement which, although can be performed on a BWR 6 RPCS instrumented plant with existing instrumentation, was intended to be applicable and performed on BWR 4 and BWR 5 RSCS instrumented plants.

3. Page 3/4 1-16

- a/b. This entire technical specification should be rewritten. The real requirements for control rod withdrawal are covered explicitly in other technical specifications. This technical specification should either be rewritten or deleted entirely with appropriate footnotes added to other corresponding technical specifications. GSU has already added several such footnotes for clarification and continuity. However, the intent is understood and can be complied with.

4. Page 3/4 3-24 and 3/4 3-25

- a. Delete the ≤ 10 second response time requirements on all trip functions with the exception of the Main Steam Line Isolation trip functions.
- b. This change would make this technical specification consistent with the bases which states that "except for the MSIVs, the safety analysis does not address individual sensor response times or the response times of the logic systems to which the sensors are connected." This is a Generic Issue not just River Bend.

5. Page 3/4 3-83

- a. Add notation "The provisions of Specification 3.0.4 are not applicable" to ACTION 81.
- b. This change will provide the flexibility to change modes while satisfying the accident monitoring LCO by reliance on the provisions of this ACTION statement.

6. Page 3/4 4-11

- a. Change "...two other closed manual..." to "...one other closed manual..." in ACTION c.
- b. This change permits the flexibility to close at least one other closed manual, deactivated automatic or check valve to isolate a high pressure portion of the system with greater than acceptable leakage from the low pressure portion of the system.

7. Page 3/4 7-19

- a. Change the ASTM standards referenced in Surveillance Requirement 4.7.6.1.2.b. to be consistent with those in the diesel generator technical specification, 4.8.1.1.2.d. page 3/4 8-4.
- b. The fuel oil used for the diesel driven fire pump and the diesel generators is the same fuel oil. The individual technical specifications require different tests. This change would make the fuel oil testing consistent.

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

4. No "slow" control rod, "fast" control rod with individual scram insertion time in excess of the limits of ACTION a.2, or otherwise inoperable control rod occupies an adjacent location in any direction, including the diagonal, to another such control rod.

Otherwise, be in at least HOT SHUTDOWN within 12 hours.

- b. ~~With a "slow" control rod(s) not satisfying ACTION a.1, above:~~

Otherwise:

1. Declare the "slow" control rod(s) inoperable, and
2. Perform the Surveillance Requirements of Specification 4.1.3.2.c at least once per 60 days when operation is continued with three or more "slow" control rods declared inoperable.

2

~~Otherwise, be in at least HOT SHUTDOWN within 12 hours.~~

- c. With the maximum scram insertion time of one or more control rods exceeding the maximum scram insertion time limits of Specification 3.1.3.2 as determined by Specification 4.1.3.2.c, operation may continue provided that:

1. "Slow" control rods, i.e., those which exceed the limits of Specification 3.1.3.2, do not make up more than 20% of the 10% sample of control rods tested.
2. Each of these "slow" control rods satisfies the limits of ACTION a.1.
3. The eight adjacent control rods surrounding each "slow" control rod are:
 - a) Demonstrated through measurement within 12 hours to satisfy the maximum scram insertion time limits of Specification 3.1.3.2, and
 - b) OPERABLE.
4. The total number of "slow" control rods, as determined by Specification 4.1.3.2.c, when added to the sum of ACTION a.3, as determined by Specification 4.1.3.2.a and b, does not exceed 5.

(after reactor coolant pressure is 2950 psig)

Otherwise, be in at least HOT SHUTDOWN within 12 hours.

- d. The provisions of Specification 3.0.4 are not applicable.

move
to
end of
Action
A.1
of page
3/4 1-6