



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

February 2, 2021

Mrs. Mandy Halter
Vice President, Regulatory
Assurance Licensing
Entergy Services, LLC
M-ECH-29
1340 Echelon Parkway
Jackson, MS 39213

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 AND RIVER BEND STATION,
UNIT 1 – ISSUANCE OF AMENDMENTS RE: ADOPTION OF TSTF-439,
REVISION 2, “ELIMINATE SECOND COMPLETION TIMES LIMITING TIME
FROM DISCOVERY OF FAILURE TO MEET AN LCO” (EPID L-2020-LLA-0009)

Dear Mrs. Halter:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued amendments consisting of changes to the technical specifications (TSs) in response to your application dated January 24, 2020, for Grand Gulf Nuclear Station, Unit 1 (Grand Gulf) and River Bend Station, Unit 1 (River Bend). The following amendments are enclosed:

- Amendment No. 226 to Renewed Facility Operating License No. NPF-29 for Grand Gulf.
- Amendment No. 205 to Renewed Facility Operating License No. NPF-47 for River Bend.

The amendments revise the Grand Gulf and River Bend TSs to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-439, Revision 2, “Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO [Limiting Condition for Operation],” dated June 20, 2005. The NRC approved the traveler on January 11, 2006.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Siva P. Lingam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-416 and 50-458

Enclosures:

1. Amendment No. 226 to NPF-29
2. Amendment No. 205 to NPF-47
3. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY OPERATIONS, INC.

SYSTEM ENERGY RESOURCES, INC.

COOPERATIVE ENERGY, A MISSISSIPPI ELECTRIC COOPERATIVE

ENTERGY MISSISSIPPI, LLC

DOCKET NO. 50-416

GRAND GULF NUCLEAR STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 226
Renewed License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated January 24, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-29 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 226 are hereby incorporated into this renewed license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennifer L. Dixon-Herrity, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-29 and
the Technical Specifications

Date of Issuance: February 2, 2021

ATTACHMENT TO LICENSE AMENDMENT NO. 226

RENEWED FACILITY OPERATING LICENSE NO. NPF-29

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

Replace the following pages of Renewed Facility Operating License No. NPF-29 and the Appendix A, Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License

REMOVE

-4-

INSERT

-4-

Technical Specifications

REMOVE

1.0-12

1.0-16

1.0-17

3.8-2

3.8-3

3.8-38

INSERT

1.0-12

1.0-16

1.0-17

3.8-2

3.8-3

3.8-38

amended, are fully applicable to the lessors and any successors in interest to those lessors, as long as the renewed license of GGNS Unit 1 remains in effect.

- (b) SERI is required to notify the NRC in writing prior to any change in (i) the terms or conditions of any new or existing sale or lease agreements executed as part of the above authorized financial transactions, (ii) the GGNS Unit 1 operating agreement, (iii) the existing property insurance coverage for GGNS Unit 1 that would materially alter the representations and conditions set forth in the Staff's Safety Evaluation Report dated December 19, 1988 attached to Amendment No. 54. In addition, SERI is required to notify the NRC of any action by a lessor or other successor in interest to SERI that may have an effect on the operation of the facility.

- C. The renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

- (1) Maximum Power Level

Entergy Operations, Inc. is authorized to operate the facility at reactor core power levels not in excess of 4408 megawatts thermal (100 percent power) in accordance with the conditions specified herein.

- (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 226 are hereby incorporated into this renewed license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

During Cycle 19, GGNS will conduct monitoring of the Oscillation Power Range Monitor (OPRM). During this time, the OPRM Upscale function (Function 2.f of Technical Specification Table 3.3.1.1-1) will be disabled and operated in an "indicate only" mode and technical specification requirements will not apply to this function. During such time, Backup Stability Protection measures will be implemented via GGNS procedures to provide an alternate method to detect and suppress reactor core thermal hydraulic instability oscillations. Once monitoring has been successfully completed, the OPRM Upscale function will be enabled and technical specification requirements will be applied to the function; no further operating with this function in an "indicate only" mode will be conducted.

1.3 Completion Times

DESCRIPTION
(continued)

However, when a subsequent division, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability;
and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extension does not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each division, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ."

(continued)

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X subsystem inoperable.	A.1 Restore Function X subsystem to OPERABLE status.	7 days
B. One Function Y subsystem inoperable.	B.1 Restore Function Y subsystem to OPERABLE status.	72 hours
C. One Function X subsystem inoperable.	C.1 Restore Function X subsystem to OPERABLE status.	72 hours
<u>AND</u>	<u>OR</u>	
One Function Y subsystem inoperable.	C.2 Restore Function Y subsystem to OPERABLE status.	72 hours

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-3 (continued)

When one Function X subsystem and one Function Y subsystem are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each subsystem, starting from the time each subsystem was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second subsystem was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected subsystem was declared inoperable (i.e., initial entry into Condition A).

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 Restore required offsite circuit to OPERABLE status.	72 hours <u>AND</u> 24 hours from discovery of two divisions with no offsite power
B. One required DG inoperable for reasons other than Condition F.	B.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s). <u>AND</u> B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable. <u>AND</u>	1 hour <u>AND</u> Once per 8 hours thereafter 4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s) (continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2 for OPERABLE DG(s).	24 hours
	<u>AND</u>	
	B.4 Restore required DG to OPERABLE status.	72 hours from discovery of an inoperable Division 3 DG
		<u>AND</u>
		14 days
C. Two required offsite circuits inoperable.	C.1 Declare required feature(s) inoperable when the redundant required feature(s) are inoperable.	12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	C.2 Restore one required offsite circuit to OPERABLE status.	24 hours

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Distribution Systems—Operating

LCO 3.8.7 Division 1, Division 2, and Division 3 AC and DC electrical power distribution subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

-----NOTE-----
Division 3 electrical power distribution subsystems are not required to be OPERABLE when High Pressure Core Spray System is inoperable.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Division 1 or 2 AC electrical power distribution subsystem(s) inoperable.	A.1 Restore Division 1 and 2 AC electrical power distribution subsystems to OPERABLE status.	8 hours
B. One or more Division 1 or 2 DC electrical power distribution subsystem(s) inoperable.	B.1 Restore Division 1 and 2 DC electrical power distribution subsystems to OPERABLE status.	2 hours

(continued)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY LOUISIANA, LLC

AND

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

RIVER BEND STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 205
License No. NPF-47

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated January 24, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-47 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 205 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennifer L. Dixon-Herrity, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility Operating
License No. NPF-47 and
the Technical Specifications

Date of Issuance: February 2, 2021

ATTACHMENT TO LICENSE AMENDMENT NO. 205

RENEWED FACILITY OPERATING LICENSE NO. NPF-47

RIVER BEND STATION, UNIT 1

DOCKET NO. 50-458

Replace the following pages of the Renewed Facility Operating License No. NPF-47 and the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE

-3-

INSERT

-3-

Technical Specifications

REMOVE

1.0-12a

1.0-16

1.0-17

3.1-20

3.8-2

3.8-3

3.8-38

3.8-39

INSERT

1.0-12a

1.0-16

1.0-17

3.1-20

3.8-2

3.8-3

3.8-38

3.8-39

- (2) EOI, pursuant to Section 103 of the Act and 10 CFR Part 50, to possess, use and operate the facility at the above designated location in accordance with the procedures and limitations set forth in this renewed license;
- (3) EOI, pursuant to Section 103 of the Act and 10 CFR Part 70, to receive, possess and to use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (4) EOI, pursuant to Section 103 of the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) EOI, pursuant to Section 103 of the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) EOI, pursuant to Section 103 of the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

EOI is authorized to operate the facility at reactor core power levels not in excess of 3091 megawatts thermal (100% rated power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 205 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

1.3 Completion Times

DESCRIPTION
(continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ."

(continued)

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X subsystem inoperable.	A.1 Restore Function X subsystem to OPERABLE status.	7 days
B. One Function Y subsystem inoperable.	B.1 Restore Function Y subsystem to OPERABLE status.	72 hours
C. One Function X subsystem inoperable. <u>AND</u> One Function Y subsystem inoperable.	C.1 Restore Function X subsystem to OPERABLE status. <u>OR</u> C.2 Restore Function Y subsystem to OPERABLE status.	72 hours 72 hours

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-3 (continued)

When one Function X subsystem and one Function Y subsystem are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each subsystem, starting from the time each subsystem was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second subsystem was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected subsystem was declared inoperable (i.e., initial entry into Condition A).

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.

(continued)

3.1 REACTIVITY CONTROL SYSTEMS

3.1.7 Standby Liquid Control (SLC) System

LCO 3.1.7 Two SLC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (C)(E) < 570.	A.1 Restore (C)(E) \geq 570.	72 hours
B. One SLC subsystem inoperable for reasons other than Condition A.	B.1 Restore SLC subsystem to OPERABLE status.	7 days
C. Two SLC subsystems inoperable for reasons other than Condition A.	C.1 Restore one SLC subsystem to OPERABLE status.	8 hours
D. Required Action and associated Completion Time not met.	D.1 Be in MODE 3.	12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>-----NOTE----- Verification is only required if 22 kV onsite circuit is supplying Division III safety related bus E22-S004 from normal power transformer STX-XNS1C. -----</p> <p>A.2 Verify E22-S004 is aligned to transfer to the preferred station transformer powered by the OPERABLE offsite circuit.</p> <p><u>AND</u></p> <p>A.3 Restore required offsite circuit to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>72 hours</p> <p><u>AND</u></p> <p>24 hours from discovery of two divisions with no offsite power</p>
B. Automatic transfer function not OPERABLE	B.1 Restore Division III power source to the preferred station service transformers	12 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	C.3.2 Perform SR 3.8.1.2 for OPERABLE DG(s).	24 hours
	<u>AND</u>	
	C.4 Restore required DG to OPERABLE status.	72 hours from discovery of an inoperable Division III DG
		<u>AND</u> 14 days
D. Two required offsite circuits inoperable.	D.1 Declare required feature(s) inoperable when the redundant required feature(s) are inoperable.	12 hours from discovery of Condition D concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	D.2 Restore one required offsite circuit to OPERABLE status.	24 hours

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.9 Distribution Systems–Operating

LCO 3.8.9 Division I, Division II, and Division III AC and DC, and Division I and II AC vital bus electrical power distribution subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

-----NOTE-----
Division III electrical power distribution subsystems are not required to be OPERABLE when High Pressure Core Spray System and Standby Service Water pump 2C are inoperable.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Division I or II AC electrical power distribution subsystems inoperable.	A.1 Restore Division I and II AC electrical power distribution subsystems to OPERABLE status.	8 hours
B. One or more Division I or II AC vital bus distribution subsystems inoperable.	B.1 Restore Division I and II AC vital bus distribution subsystems to OPERABLE status.	8 hours

(continued)

ACTION (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One or more Division I or II DC electrical power distribution subsystems inoperable.	C.1 Restore Division I and II DC electrical power distribution subsystems to OPERABLE status.	2 hours
D. Required Action and associated Completion Time of Condition A, B, or C not met.	D.1 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 3. ----- Be in MODE 3.	12 hours
E. One or more Division III AC or DC electrical power distribution subsystems inoperable.	E.1 Declare High Pressure Core Spray System and Standby Service Water System pump 2C inoperable.	Immediately
F. Two or more divisions with inoperable distribution subsystems that result in a loss of function.	F.1 Enter LCO 3.0.3.	Immediately



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 226 TO
RENEWED FACILITY OPERATING LICENSE NO. NPF-29 AND AMENDMENT NO. 205 TO
RENEWED FACILITY OPERATING LICENSE NO. NPF-47
ENTERGY OPERATIONS, INC.
GRAND GULF NUCLEAR STATION, UNIT 1
RIVER BEND STATION, UNIT 1
DOCKET NOS. 50-416 AND 50-458

1.0 INTRODUCTION

By letter dated January 24, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20024E597), Entergy Operations, Inc. (the licensee) requested changes to the Technical Specifications (TSs) for Grand Gulf Nuclear Station, Unit 1 (Grand Gulf), and River Bend Station, Unit 1 (River Bend).

The amendments would revise the Grand Gulf and River Bend TSs to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-439, Revision 2, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO [Limiting Condition for Operation]," dated June 20, 2005 (ADAMS Accession No. ML051860296). The U.S. Nuclear Regulatory Commission (NRC, the Commission) approved the traveler on January 11, 2006 (ADAMS Accession No. ML060120272).

The proposed changes would allow the elimination of second completion times that limit the time from discovery of the failure to meet an LCO.

2.0 REGULATORY EVALUATION

2.1 System Description

In the license amendment request (LAR) dated January 24, 2020, the licensee proposed changes to the Grand Gulf and River Bend TSs for the alternating current (AC) electrical power system and power distribution system. Changes to the standby liquid control (SLC) system are proposed for River Bend.

The unit Class 1E AC electrical power distribution system AC sources consist of two offsite power sources and three onsite standby power sources (diesel generators (DGs)). The Class 1E AC distribution system supplies electrical power to three divisional load groups: Divisions 1, 2, and 3 for Grand Gulf and Divisions I, II, and III for River Bend. The DGs in Division 3 for Grand Gulf and Division III for River Bend supply AC power solely for their respective high-pressure core spray systems. The DGs in Divisions 1 and 2 for Grand Gulf and Divisions I and II for River Bend supply AC power for the remainder of the engineered safety feature system loads; these DGs are redundant to each other. Any two of the three divisions suffice to support the engineered safety feature system's minimum safety functions necessary to shut down the unit and maintain it in a safe shutdown condition.

The onsite Class 1E AC and direct current (DC) electrical power distribution system ensures the availability of AC and DC electrical power distribution subsystems for the structures, systems, and components required to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated design-basis accident (DBA). The River Bend onsite Class 1E AC and DC electrical power distribution systems are divided by division into three independent AC and DC, and two independent AC vital bus electrical power distribution subsystems. The Grand Gulf AC and DC electrical power distribution systems are each divided into three subsystems.

The River Bend SLC system is designed as a backup to the control rod drive system, which satisfies the requirements on an anticipated transient without scram. The SLC system is capable of bringing the reactor, at any time in a fuel cycle, from full power and minimum control rod inventory (which is at the peak of the xenon transient) to a subcritical condition with the reactor in the most reactive xenon free state without taking credit for control rod movement. In order to accomplish shutdown and cooldown, the SLC system injects borated water into the reactor core. The SLC system is manually initiated from the main control room.

2.2 Proposed TS Changes

The licensee's proposed changes described below would apply to both Grand Gulf and River Bend TSs, unless otherwise indicated.

2.2.1 Proposed Revisions to TS 1.3, "Completion Times"

TS 1.3 for Grand Gulf and River Bend describes the rules and usage regarding TS completions times. TS Example 1.3-3 would be revised by removing the second completion times for Required Actions A.1 and B.1, and the discussion in the example would be replaced with a discussion on procedural limits for failing to meet the LCO.

2.2.2 Proposed Revision to River Bend TS 3.1.7, "Standby Liquid Control (SLC) System"

River Bend TS LCO 3.1.7 requires two SLC subsystems to be operable in Modes 1 and 2. With the product of concentration times enrichment ((C)(E)) of the sodium pentaborate solution less than (<) 570, existing TS Required Action A.1 requires that the value be restored to greater than or equal to (\geq) 570. The completion time for TS Required Action A.1 states "72 hours AND 10 days from discovery of failure to meet the LCO." With one SLC subsystem inoperable for reasons other than Condition A, existing TS Required Action B.1 requires the SLC subsystem be restored to operable status with a completion time of "7 days AND 10 days from discovery of failure to meet the LCO." Required Actions A.1 and B.1 would be revised by deleting their

second completion times, which state, “AND 10 days from the discovery of failure to meet the LCO.”

2.2.3 Proposed Revision to TS 3.8.1, “AC Sources – Operating”

Grand Gulf and River Bend TS LCO 3.8.1 requires two qualified circuits between the offsite transmission network and the onsite Class 1E AC electrical power distribution system and three DGs to be operable in Modes 1, 2, and 3 (Grand Gulf LCO 3.8.1 also requires Division 1 and 2 automatic load sequencers to be operable). With one offsite circuit inoperable, existing TS Required Action A.2 for Grand Gulf and A.3 for River Bend require that the offsite circuit be restored to operable status with a completion time of “72 hours AND 24 hours from discovery of two divisions with no offsite power AND 17 days from discovery of failure to meet LCO.” With one DG inoperable, existing TS Required Action B.4 for Grand Gulf and C.4 for River Bend require that the DG be restored to operable status with a completion time of “72 hours from discovery of an inoperable [Division 3 for Grand Gulf] [Division III for River Bend] DG AND 14 days AND 17 days from discovery of failure to meet LCO.” The licensee’s proposed changes to TS LCO 3.8.1 Required Actions A.2 and B.4 for Grand Gulf and B.3 and C.4 for River Bend would delete the completion times, which state, “AND 17 days from discovery of failure to meet LCO.”

2.2.4 Proposed Revision to Grand Gulf TS 3.8.7, “Distribution Systems – Operating”

Grand Gulf TS LCO 3.8.7 requires Division 1, Division 2, and Division 3 AC and DC buses to be operable in Modes 1, 2, and 3. With one or more Division 1 or 2 AC electrical power distribution subsystems inoperable, existing TS Required Action A.1 requires that the subsystems be restored to operable within “8 hours AND 16 hours from discovery of failure to meet LCO.” With one or more Division 1 or 2 DC electrical power distribution subsystems inoperable, existing TS Required Action B.1 requires that the subsystems be restored to operable within “2 hours AND 16 hours from discovery of failure to meet LCO.” The licensee’s proposed changes to Grand Gulf TS LCO 3.8.7 Required Actions A.1 and B.1 would delete the second completion times which state, “AND 16 hours from discovery of failure to meet LCO.”

2.2.5 Proposed Revision to River Bend TS 3.8.9, “Distribution Systems – Operating”

River Bend TS LCO 3.8.9 requires Divisions I, II, and III AC and DC buses, and Divisions I and II AC vital buses to be operable in Modes 1, 2, and 3. With one or more Division I or II AC electrical power distribution subsystems inoperable, existing TS Required Action A.1 requires that the subsystems be restored to operable within “8 hours AND 16 hours from discovery of failure to meet LCO.” With one or more Division I or II AC vital bus distribution subsystems inoperable, existing TS Required Action B.1 requires that the subsystems be restored to operable within “8 hours AND 16 hours from discovery of failure to meet LCO.” With one or more Division I or II DC electrical power distribution subsystems inoperable, existing TS Required Action C.1 requires that the subsystems be restored to operable within “2 hours AND 16 hours from discovery of failure to meet LCO.” The licensee’s proposed changes to River Bend TS LCO 3.8.9 Required Actions A.1 and B.1 would delete the second completion times which state, “AND 16 hours from discovery of failure to meet LCO.”

2.3 Regulatory Requirements and Guidance

The regulation in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(a)(1) requires an applicant for an operating license to include in the application proposed TSs in

accordance with the requirements of 10 CFR 50.36, "Technical specifications." The applicant must include in the application a summary statement of the bases or reasons for such specifications, other than those covering administrative controls." However, per 10 CFR 50.36(a)(1), these TS Bases "shall not become part of the technical specifications."

The regulation in 10 CFR 50.36(b) states:

Each license authorizing operation of a production or utilization facility of a type described in § 50.21 or § 50.22 will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34. The Commission may include such additional technical specifications as the Commission finds appropriate.

The categories of items required to be included in the TSs are provided in 10 CFR 50.36(c). As required by 10 CFR 50.36(c)(2)(i), the TSs will include LCOs, which states, in part, that "Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met."

The regulation in 10 CFR 50.36(c)(3) requires TSs to include items in the category of surveillance requirements (SRs), which states that "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

The NRC staff's guidance for the review of TSs is in Chapter 16, "Technical Specifications," of NUREG-0800, Revision 3, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition" (SRP), dated March 2010 (ADAMS Accession No. ML100351425).

3.0 TECHNICAL EVALUATION

The NRC staff evaluated the licensee's LAR in accordance with the regulatory requirements and guidance discussed in Section 2.3 of this safety evaluation and the NRC-approved Traveler TSTF-439, Revision 2. In determining whether an amendment to a license will be issued, the Commission is guided by the considerations that govern the issuance of initial licenses to the extent applicable and appropriate. In making its determination as to whether to amend the license, the NRC staff considered those regulatory requirements that are automatically conditions of the license through 10 CFR 50.54. The LAR also included proposed changes to the TS Bases. Although the TS Bases are not part of the TSs, the NRC staff confirmed that that the TS Bases describe the basis for each revised TS requirement accurately, as described in Chapter 16 of the SRP.

3.1 NRC Staff Evaluation

Additional secondary completion times (such as limits on the period of time from discovery of the failure to meet the LCO) are specified for these instances to prevent repeated entry and exit from alternating TS required actions. Administrative controls will replace second completion times as described in the licensee's LAR. In addition, two programs provide a strong

disincentive to licensees continuing operation with alternating required actions as described above. These programs are the maintenance rule (10 CFR 50.65 "Requirements for monitoring the effectiveness of maintenance at nuclear power plants") program and the reactor oversight process (ROP).

In the LAR, the licensee stated the following regarding the maintenance rule:

Under 10 CFR 50.65(a)(4), the risk impact of all inoperable risk-significant equipment is assessed and managed when performing preventative or corrective maintenance. The risk assessments are conducted using the procedures and guidance endorsed by Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 3 dated May 2012. Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants, Revision 4A, dated April 2011." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed maintenance is acceptable. This comprehensive program provides much greater assurance of safe plant operation than the second completion times in the TS.

TSs are part of the operating license and set forth requirements governing operations, including what equipment must normally be in service, how long equipment can be out of service, compensatory actions, and surveillance testing to demonstrate equipment readiness. TSs provide adequate assurance of the availability and reliability of equipment needed to prevent, and if necessary, mitigate accidents and transients.

The maintenance rule requires that commercial nuclear power plant licensees perform certain assessments of the status of plant equipment before performing proposed maintenance activities. The maintenance rule also requires that licensees assess and manage the increase in risk that may result from the proposed maintenance activities. The Commission believes that proper implementation of the rule will reduce the likelihood and consequences of an accidental release of radioactive material caused by imprudently prioritized, planned, or scheduled maintenance.

Under the TSs, the completion time for one system within an LCO is not generally affected by inoperable equipment in another LCO. However, the second completion time influenced the completion time for one system based on the condition of another system, but only if the two systems were required by the same LCO.

Plant maintenance rule programs implement risk-based configuration management programs that augment the deterministic completion times in the TSs. The NRC resident inspectors also monitor the licensee's corrective action process and could take action within the bounds of the ROP if the licensee's maintenance program allowed the systems required by a single LCO to become concurrently inoperable multiple times. The performance and condition monitoring activities required by 10 CFR 50.65 identify maintenance practices that would result from multiple alternating overlapping entries into and out of different actions of the same TSs that

contribute to unacceptable cumulative unavailability of these structures, systems, and components.

In the LAR, the licensee stated the following regarding the ROP:

[Nuclear Energy Institute] NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," describes the tracking and reporting of performance indicators to support the NRC's Reactor Oversight Process (ROP). The NEI document is endorsed by Regulatory Issue Summary 2001-11, "Voluntary Submission of Performance Indicator Data." NEI 99-02, Section 2.2, describes the mitigating systems cornerstone. NEI 99-02 specifically addresses emergency AC sources, which encompasses the AC Sources and distribution system LCOs. Extended unavailability of these systems due to multiple entries into the actions would affect the NRC's evaluation of the licensee's performance under the ROP.

The objective of this mitigating systems cornerstone is to monitor the availability, reliability, and capability of systems that mitigate the effects of initiating events to prevent core damage. Licensees also reduce the likelihood of reactor accidents by maintaining the availability and reliability of mitigating systems. Mitigating systems include those systems associated with safety injection, decay heat removal, and their support systems, such as emergency AC power systems (which encompass the AC sources distribution system LCOs as noted by the licensee), and the auxiliary feedwater system. Inputs to the mitigating systems cornerstone include both inspection procedures and performance indicators to ensure that all ROP objectives are being met. Satisfactory licensee performance within the mitigating systems ROP cornerstone provides reasonable assurance in monitoring the inappropriate use of TS condition completion times.

NRC inspection findings for each plant are documented in inspection reports in accordance with Inspection Manual Chapter 0612 and summarized in plant issues matrices. Inspection findings are evaluated using the significance determination process in accordance with Inspection Manual Chapter 0609 to evaluate the safety significance of the findings.

Grand Gulf and River Bend TS Example 1.3-3 would be revised to eliminate the second completion time for Required Actions A.1 and B.1, and replace the discussion regarding second completion times with the following:

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.

The completion times associated with Grand Gulf TS 3.8.1 Required Actions A.2 and B.4 and River Bend TS 3.8.1 Required Actions A.3 and C.4, which state, "AND 17 days from discovery of failure to meet LCO," currently provide a limit on the time allowed in a specified condition after discovery of failure to meet the LCO. This limit was considered reasonable for situations in

which Grand Gulf Conditions A and B and River Bend Conditions A and C are entered concurrently prior to the NRC staff approval of TSTF-439.

Likewise, the completion times associated with the following TSs currently provide a limit on the time allowed in a specified condition after discovery of failure to meet the LCO:

- Grand Gulf TS 3.8.7 Required Actions A.1 and B.1, which state, “AND 16 hours from discovery of failure to meet LCO;”
- River Bend TS 3.8.9 Required Actions A.1, B.1, and C.1, which state, “AND 16 hours from discovery of failure to meet LCO;” and
- River Bend TS 3.1.7 Required Actions A.2 and B.1, which state, “AND 10 days from the discovery of failure to meet the LCO.”

With the proposed deletion of portions of the completion times described above for Grand Gulf TSs 3.8.1 and 3.8.7 and River Bend TSs 3.1.7, 3.8.1, and 3.8.9, the TSs will still have a mechanism to limit the maximum time allowed for any combination of conditions that results in a single contiguous occurrence of failing to meet the LCO. As described above, the proposed TS Example 1.3-3 will require administrative controls to limit the maximum time allowed for any combination of conditions that result in a single contiguous occurrence of failing to meet the LCO. Therefore, the NRC staff finds the proposed changes are acceptable.

In addition, the NRC staff finds that assessment of the licensee’s performance within the mitigating systems ROP cornerstone provides reasonable assurance in monitoring the inappropriate use of TS condition completion times.

The NRC staff concludes that the TSs, as modified by the proposed changes, will continue to meet the regulatory requirements of 10 CFR 50.36 for the following reasons. In accordance with 10 CFR 50.36(c)(2)(i), when an LCO is not met, the licensee is required to shut down the reactor or follow any remedial action permitted by the TSs until the LCO can be met. As described in the LAR, the proposed changes would remove part of the permissible remedial actions from Grand Gulf LCOs 3.8.1 and 3.8.7 and River Bend LCOs 3.1.7, 3.8.1, and 3.8.9. Under the regulations in 10 CFR 50.92, “Issuance of amendment,” and 10 CFR 50.57, “Issuance of operating license,” to issue the amended TSs, the NRC must be able to find, among other things, that operation with the amended remedial actions (i.e., without the additional completion times) provides reasonable assurance of public health and safety.

River Bend TS Action 3.1.7, Condition A, provides reasonable assurance of public health and safety because with the product of concentration times enrichment ((C)(E)) of the sodium pentaborate solution < 570, Required Action A.1 requires the value to be restored to ≥ 570 within “72 hours.” The NRC staff finds this acceptable because the completion time takes the following into account:

1. Given the SLC system otherwise satisfies the required limits on weight (≥ 143 pounds), concentration (less than or equal to (≤) 9.5 percent), temperature (≥ 45 degrees Fahrenheit), and volume, the system can perform its original design basis function; and
2. The probability of an anticipated transient without scram event is low.

River Bend TS 3.1.7 Condition B provides reasonable assurance of public health and safety because with one SLC subsystem inoperable for reason other than Condition A, TS Required Action B.1 requires the SLC subsystem be restored to operable within "7 days." The NRC staff finds this acceptable because the completion time takes the following into account:

1. The availability of an operable subsystem capable of performing the intended SLC system function; and
2. The low probability of a DBA or severe transient occurring concurrent with the failure of the control rod drive system to shut down the plant.

Grand Gulf and River Bend TS Action 3.8.1, Condition A, provides reasonable assurance of public health and safety because with one offsite circuit inoperable, TS Required Action A.2 for Grand Gulf and Required Action A.3 for River Bend still requires that the offsite circuit be restored to operable status with a completion time of "72 hours." The NRC staff finds this action acceptable because the completion time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and the low probability of a DBA occurring during this period.

TS Action 3.8.1, Condition B for Grand Gulf and Condition C for River Bend, provides reasonable assurance of public health and safety because with one DG inoperable, TS Required Action B.4 for Grand Gulf and Required Action C.4 for River Bend still requires that the DG be restored to operable status with a completion time of 72 hours for an inoperable DG in the third division and 14 days for an inoperable DG in the one of other two divisions. The NRC staff finds this action acceptable because the completion times take into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and the low probability of a DBA occurring during this period.

Grand Gulf Action 3.8.7 A provides reasonable assurance of public health and safety because with one or more Division 1 or 2 AC electrical power distribution subsystem(s) inoperable, Required Action A.1 requires that the subsystem(s) be restored to operable within "8 hours." (River Bend Action 3.8.9 A is applicable to Divisions I or II, written similarly to Grand Gulf Action 3.8.7 A.) The NRC staff finds this acceptable because the completion time takes the following into account:

1. The potential for decreased safety if the attention of the unit operators is diverted from the evaluations and actions necessary to restore power to the affected division to the actions associated with taking the unit to shut down within this time limit; and
2. The potential for an event in conjunction with a single failure of a redundant component in the division with AC power.

Grand Gulf TS Action 3.8.7, Condition B, provides reasonable assurance of public health and safety because with one or more Division 1 or 2 DC electrical power distribution subsystem(s) inoperable, Required Action B.1 requires that the subsystem(s) be restored to operable within "2 hours." River Bend TS Action 3.8.9 Condition C is applicable to Divisions I or II, written

similarly to Grand Gulf TS Action 3.8.7 Condition B. The NRC staff finds this acceptable because the completion time takes the following into account:

1. The potential for decreased safety when requiring a change in plant conditions (i.e., requiring a shutdown) while not allowing stable operation to continue;
2. The potential for decreased safety when requiring entry into numerous applicable conditions and required actions for components without DC power, while not providing sufficient time for the operators to perform the evaluations and actions necessary to restore power to the affected division; and
3. The potential for an event in conjunction with a single failure of a redundant component.

River Bend TS Action 3.8.9 Condition B, provides reasonable assurance of public health and safety because with one or more Division I or II AC vital bus subsystems inoperable, Required Action B.1 requires that the subsystem be restored to operable within "8 hours." The NRC staff finds this change acceptable because the completion time takes into account the importance to safety of restoring the AC vital bus to operable status, the redundant capability afforded by the other operable vital buses, and the low probability of a DBA occurring during this period.

3.2 TS Bases Changes

The regulation in 10 CFR 50.36(a)(1) states, in part, that "A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the TSs." Consistent with 10 CFR 50.36(a)(1), the licensee submitted corresponding TS Bases changes that provide the reasons for the proposed TSs changes. The NRC staff notes that the proposed TS Bases changes describe the bases for the affected TSs and follow the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published in the *Federal Register* on July 22, 1993 (58 FR 39132); however, the NRC staff does not approve the LAR TS Bases that have been submitted as 'information only.'

3.3 Variations from the NRC-Approved Traveler

In Section 2.2 of the LAR, the licensee listed several variations from the TS changes described in NRC-approved TSTF-439, Revision 2, or the applicable parts of the NRC staff's safety evaluation for TSTF-439. The variations consist of plant-specific numbering differences and changes to requirements described in TSTF-439 that are not included in the plant-specific TSs. These variations are administrative, and do not affect the applicability of TSTF-439 or the NRC staff's safety evaluation for TSTF-439 to the proposed amendments to the Grand Gulf TSs and River Bend TSs. In addition, the proposed variations do not affect any requirements in either the Grand Gulf or River Bend TSs. Therefore, the NRC staff finds these variations to be acceptable.

3.4 Technical Summary

The NRC staff reviewed the proposed changes to the TSs and determined that they meet the standards for TSs in 10 CFR 50.36(b). The proposed SRs assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met and satisfy 10 CFR 50.36(c)(3). Additionally, the changes to the TSs

were reviewed for technical clarity and consistency with customary terminology and format in accordance with Chapter 16 of the SRP.

The NRC staff also evaluated the impact of the proposed changes on the design-basis radiological consequence analyses against the regulatory requirements and guidance identified in Section 2.3 of this safety evaluation. The NRC staff finds that with the proposed changes, the TSs will continue to comply with the requirements of the current radiological consequence analyses. Therefore, the proposed changes are acceptable regarding the radiological consequences of the postulated DBAs.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Mississippi and Louisiana officials were notified of the proposed issuance of the amendments on January 11, 2021. The State officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to the installation or use of facility components located within the restricted areas as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, published in the *Federal Register* on May 5, 2020 (85 FR 26730), and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Khadijah N. West

Date: February 2, 2021

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 AND RIVER BEND STATION,
UNIT 1 – ISSUANCE OF AMENDMENTS RE: ADOPTION OF TSTF-439,
REVISION 2, “ELIMINATE SECOND COMPLETION TIMES LIMITING TIME
FROM DISCOVERY OF FAILURE TO MEET AN LCO” (EPID L-2020-LLA-0009)
DATED FEBRUARY 2, 2021

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