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Director
Nuclear Safety Assurance

May 15, 2000

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29

Generic Letter (GL) 96-06

GNRO-2000/00036

Gentlemen:

On April 27, 2000 members of the Grand Gulf staff contacted Mr. James Tatum, of your staff to respond to additional questions regarding the Grand Gulf response to GL 96-06 dated August 12, 1999. Mr. Tatum had requested additional details regarding the statement in the response that Grand Gulf intended to modify procedural guidance to address the potential water hammer concern under the postulated conditions.

In general the Drywell Chilled Water (DCW) system procedure has been modified to require a controlled restoration procedure if the DCW has been isolated for more than 5 minutes. Specifically the procedure now requires that the individual drywell cooler isolation valves be closed (12 parallel flow paths) before the DCW containment and drywell isolation are opened. Once these flow paths are isolated the containment and drywell DCW isolation valves are opened and the 12 parallel flow paths are valved in one at a time to slowly increase the DCW system flow rate to normal.

Mr. Tatum asked if Grand Gulf had performed a water hammer analysis to evaluate the procedural modifications. Grand Gulf indicated that no formal water hammer analysis had been performed. On April 28, 2000 Grand Gulf was informed that closure of the water hammer concern could not be supported without additional analysis.

Grand Gulf has concluded that further analysis regarding this issue would not be cost effective and has decided that the DCW procedural guidance will be modified to restrict restoration of the DCW system, following isolation, to drywell temperatures equal to or less than 200°F. This is justifiable since the Grand Gulf design does not credit DCW for containment cooling.

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Generic Boiling Water Reactor Owners Group Emergency Procedure Guidelines (BWROG EPG) guidance states: "When drywell temperature cannot be maintained below 135°F, operate all available drywell cooling, defeating interlocks if necessary." The generic BWROG EPG bases for this action states: "As used in this step, "available" means that the pumps, fans, and support systems necessary to supply drywell cooling are capable of performing their identified function and can be placed in service to provide cooling. If a component cannot be operated due to plant conditions or physical restrictions, it is not considered "available". For example, if an electrical loading concern were to limit operation of the drywell cooling fans, the fans would not be considered available within the context of this step." The water hammer concern clearly falls within the bounds of this discussion thus the intended operational restriction of the DCW does not deviate from the intent of the generic guidelines.

Yours truly,



JCR/war
attachment:

cc: (See Next Page)

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