Entergy

Entergy Operations, Inc.
River Bend Station
5485 U. S. Highway 61
P. O. Box 220
St. Francisville, LA 70775
Tel 225 381 4374
Fax 225 381 4872

Randall K. Edington
Vice President, Operations

October 2, 2000

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: River Bend Station
Docket No. 50-458
License No. NPF-47
Proposed License Condition Related to License Amendment Request (LAR) 99-15, Change to a License Condition for Power Uprate of River Bend Station

File Nos.: G9.5, G9.42

Reference:
1) Entergy Operations, Inc. (EOI) Letter to NRC, RBG-45077, dated July 30, 1999
2) Entergy Operations, Inc. (EOI) Letter to NRC, RBG-45293, dated April 3, 2000
3) Entergy Operations, Inc. (EOI) Letter to NRC, RBG-45337, dated May 9, 2000
4) Entergy Operations, Inc. (EOI) Letter to NRC, RBG-45428, dated July 18, 2000
5) Entergy Operations, Inc. (EOI) Letter to NRC, RBG-45471, dated August 24, 2000

RBEXEC-00-035
RBF1-00-0212
RBG-45502

Ladies and Gentlemen:

In the Reference (1) letter, EOI requested a license amendment to NPF-47 and Appendix A – Technical Specifications, of the River Bend Station (RBS). This submittal supplements our request to extend operation of RBS from its current licensed power level of 2894 megawatts thermal (MWt) by five percent to an uprated power level of 3039 MWt identified in Reference 1 above. In support of this request, EOI is submitting a administrative change to License Condition 2(c)13 associated with the referenced license amendment.

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Enclosure 1 is the proposed administrative change to License Condition 2(c)13 associated with LAR 99-15. These technical specifications were revised in accordance with the proposed changes contained in the reference (1) letter as discussed below.

License Condition (LC) 2(c)13 states RBS will not operate with partial feedwater heating temperature below 320 °F at rated conditions. Conditions which result in reduced feedwater temperature are Final Feedwater Temperature Reduction (FFWTR), which reduces feedwater temperature to increase reactor power during a coastdown, and Feedwater Heaters Out of Service (FWHOS). Both of these conditions were approved as operating options for RBS (FFWTR in Amendment 112 and FWHOS in Amendment 37). Each of these are analyzed for a reduction of 100 °F from the rated feedwater temperature. The rated feedwater temperature for RBS at the current Rated Thermal Power (RTP) of 2894 MWt is 420 °F and the rated feedwater temperature for the Power Uprate RTP of 3039 MWt (with pressure increase) is 426 °F. The values for the flow-only portion of uprate are within the revised lower bound of 326 °F. Therefore, the methodology is consistent with that provided in Reference 1 and only administratively changes the feedwater temperature limit by 6 °F.

During the final Core Operating Limits Report (COLR) development for uprate at RBS, it was determined the temperature cited in LC 2(c)13 is approximately 5 °F less than the corresponding analysis. Therefore, the temperature in the LC should be increased. As a result of a discussion with the NRC on September 28, 2000, RBS agreed to submit this administrative revision to the limit for inclusion with the final RBS Power Uprate amendment.

The following are references to the analysis and justification for an administrative change to the limit on the partial feedwater heating temperature at rated conditions from 320 to 326 °F:

> In the RBS Uprate submittal, the GE Safety Analysis Report for Uprate (Reference 1), Table 1.2, states the full feedwater temperature for uprate is 425.7 °F with the standard reactor heat balance used as a basis for the safety analyses. This table also notes the feedwater heater out of service (FWHOS) and final feedwater temperature reduction (FFWTR) events are included in the analysis. These analyses continue to use a 100 °F temperature reduction from rated conditions to determine the lowest operating feedwater temperature at rated conditions.
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> The FFWTR amendment request submitted April 9, 1998, as approved in Amendment 112, identifies the maximum reduction in feedwater temperature at rated conditions is 100 °F. At the Rated Thermal Power of 2894 MWt this reduction in feedwater temperature is 420 °F to 320 °F. This analysis was consistent with the assumptions of the FWHOS analysis as submitted.

The SERs for Amendment 112 and for FWHOS, Amendment 37, acknowledge these analyses. The analyses were done using the approved GE methods contained in GESTAR (NEDE-24011) as referenced in section 5.6.5, COLR, of the Technical Specifications. These analyses use a 100 °F reduction of feedwater temperature from rated conditions as the figure of merit. As a result of the increase in the feedwater temperature from 420 °F, at the current RTP of 2894 MWt, to 426 °F, at the uprated RTP of 3039 MWt, the corresponding lower limit of 320 °F needs to be revised to 326 °F for uprate.

In summary, the analyses done for Power Uprate at RBS are consistent with the use of 426 °F as a rated feedwater temperature and a 100 °F temperature reduction as a lower limit of operation at rated conditions. The method of analyses was also consistent with the use of approved GE methods (GESTAR). As a result, this administrative change to the LC for feedwater temperature reduction from 320 to 326 °F is consistent with the licensing and design basis. This administrative change is within current licensing basis and consistent with previous analyses submitted for River Bend Station, including those for power uprate. In addition, there will be no effect on the significant hazards considerations submitted in Reference 1. Therefore, EOI request this change be included with the NRC Safety Evaluation Report for power uprate at River Bend Station.

There are no new commitments in this letter. If you have any questions about this request, please contact Barry Burmeister at (225) 381-4148.

Affirmation: Pursuant to 28 U.S.C.A. Section 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2nd day of October 2000.

Sincerely,

Randall K. Edington

Enclosures
RKE/RJK/bmb

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 Jaffe
U.S. Nuclear Regulatory Commission
M/S OWFN 04D03
Washington, DC 20555

Mr. Prosanta Chowdhury
Program Manager - Surveillance Division
Louisiana Department of Environmental Quality
Office of Radiological Emergency Planning & Response
P. O. Box 82215
Baton Rouge, LA 70884-2215

Mr. Jefferey F. Harold
U.S. Nuclear Regulatory Commission
M/S OWFN 07D01
Washington, DC 20555

ENCLOSURE 1

ENTERGY OPERATIONS, INC.
RIVER BEND STATION (RBS)

PROPOSED LICENSE CONDITION
ASSOCIATED WITH LAR 99-15

(See attached.)

(13) Partial Feedwater Heating (Section 15.1. SER)

During power operation, the facility shall not be operated with a feedwater heating capacity which would result in a rated thermal power feedwater temperature less than 326 °F.

(14) Emergency Response Capabilities (Generic Letter 82-33. Supplement 1 to NUREG-0737. Section 7.5.2.4. SER and SSER 3. Section 18. SER. SSER 2 and SSER 3)

EOI shall complete the requirements of NUREG-0737 Supplement #1 as specified in Attachment 5. Attachment 5 is hereby incorporated into this license.

(15) Salem ATWS Events. Generic Letter 83-28 (Section 7.2.2.5. SSER 3)

EOI shall submit responses to and implement the requirements of Generic Letter 83-28 on a schedule which is consistent with that given in its letters dated August 3. 1984 and May 30. 1985.

(16) Merger Related Reports

Entergy Gulf States. Inc. shall inform the Director. NRR:

a. Sixty days prior to a transfer (excluding grants of security interests or liens) from Entergy Gulf States. Inc. to Entergy or any other entity of facilities for the production. transmission or distribution of electric energy having a depreciated book value exceeding one percent (1%) of Entergy Gulf States. Inc.'s consolidated net utility plant. as recorded on Entergy Gulf States. Inc.'s books of account.

b. Of an award of damages in litigation initiated against Entergy Gulf States. Inc. by Cajun Electric Power Cooperative regarding River Bend within 30 days of the award.

(17) Primary containment air lock doors may be open during CORE ALTERATIONS, except when moving recently irradiated fuel. (i.e.. fuel that has occupied part of a critical reactor core within the previous 11 days). provided the following conditions exist:

1) One door in each air lock is capable of being closed.

2) Hoses and cables running through the air lock employ a means to allow safe. quick disconnect and are tagged at both ends with specific instructions to expedite removal.

3) There is a minimum of 23 feet of water over the core.

4) The air lock doors are not blocked open to allow expeditious closure.