

February 6, 2001

Mr. William A. Eaton
Vice President, Operations GGNS
Entergy Operations, Inc.
P. O. Box 756
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1, CORRECTION LETTER FOR
SAFETY EVALUATION OF PROPOSED EMERGENCY PLAN TABLE 5-1
CHANGES (TAC NO. MA1130)

Dear Mr. Eaton:

On September 29, 2000, the U.S. Nuclear Regulatory Commission (NRC) issued a letter to you entitled "Proposed Emergency Plan Table 5-1 Changes," for the Grand Gulf Nuclear Station, Unit 1 (GGNS). The letter closed out the staff's review of the changes to the emergency plan (EP) that you had requested in your letter of March 6, 1998 (GNRO-98/00028), as supplemented by the letters dated January 20, 1999 (GNRO-99/00007), July 15, 1999 (GNRO-99/00058), April 6, 2000 (GNRO-2000/00021), and August 29, 2000 (GNRO-2000/00061).

Since we issued our letter, we have had discussions with your staff on what your staff regarded as incorrect statements and errors in the Safety Evaluation (SE) dated September 29, 2000, enclosed with the letter. The incorrect statements and errors are the following: (1) the statement that the dose assessor responder would possess qualifications equivalent to a Health Physics supervisor or a senior health physicist in the justification for Change L8 on page 11 of the SE and in Section 4.4 on page 31 of the SE is incorrect in that your submittals and conference calls have only stated that the responder would be trained to perform the function, which was stated in the justification for Change A3 on page 16 of the SE; (2) the error of listing "(3)" as the second proposal for Change L8 instead of listing it as "(2)," in the first paragraph of page 11 of the SE; (3) the error in adding the confusing and unneeded phrase "and provide relief," in the conclusion of Change A22 on page 23 of the SE; and (4) the error in referencing "Change R3," also in the conclusion for Change A22 on page 23 of the SE, where the reference should have been to "Change R4." Upon review of these suggested corrections, we agree that the SE should be corrected. Enclosed are the corrected pages to the SE dated September 29, 2000. We apologize for any confusion these errors may have caused.

Because neither Change A3 or L8 were characterized in your submittals as changes to the expertise of the offsite dose assessor, the approval of these changes in the SE dated September 29, 2000, should not be considered an approval of any changes to the required expertise of the offsite dose assessor in the EP for GGNS. In discussions with your staff on the above incorrect statements, they have stated that the EP proposed changes in your submittals did not change any requirements of the qualifications and training of the offsite dose assessor. Although the expertise of the individual performing the Offsite Dose Assessment task was not within the scope of the proposed EP changes addressed by our SE, in considering the errors in the SE we have identified a concern about what expertise is required for this task by the EP.

William A. Eaton

-2-

We discussed this concern with your staff during a teleconference on February 2, 2001. In the discussion, your staff provided us with clarifications and details on the expertise and training for the individuals who would perform the Offsite Dose Assessment emergency task. The details provided have resolved our concerns. We request that you provide these clarifications and details by letter within 60 days of your receipt of this letter.

Your staff also suggested that we add to Section 4.4 of the SE, references to (1) Section 8.2, "Training," of the EP, which indicates that all licensee emergency response organization (ERO) personnel participate in a formal training program; and (2) Administrative Procedure 01-S-04-21, "Emergency Preparedness Training Program," which provides a matrix indicating the qualifications and training for all ERO positions, including the offsite dose assessor. Upon review, we have decided that this detail is not needed in the SE because statements had already been made in the SE about the EP requiring training.

None of the corrections to the SE change any of the conclusions in the SE that the proposed EP changes are acceptable. If you have any questions regarding this matter, please contact me at 301-415-2623.

Sincerely,

/RA/

S. Patrick Sekerak, Project Manager
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosure: Corrected Pages 11, 23, and 31 to Safety Evaluation
dated September 29, 2000

cc w/encl: See next page

Although the expertise of the individual performing the Offsite Dose Assessment task was not within the scope of the proposed EP changes addressed by our SE, in considering the errors in the SE we have identified a concern about what expertise is required for this task by the EP. We discussed this concern with your staff during a teleconference on February 2, 2001. In the discussion, your staff provided us with clarifications and details on the expertise and training for the individuals who would perform the Offsite Dose Assessment emergency task. The details provided have resolved our concerns. We request that you provide these clarifications and details by letter within 60 days of your receipt of this letter.

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S. Patrick Sekerak, Project Manager
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JUSTIFICATION: To support this change, the licensee proposes to (1) indicate that the capability to perform dose assessments is on-shift (to be performed by a person assigned other duties i.e., not dedicated), delete the 30 minute Health Physics Supervisor position, and (2) indicate a Radiological Assessment responder would respond in 75 minutes. In Change M3, the licensee proposes to relocate the 30-minute Offsite Dose Assessment task to an on-shift capability position and indicate that it has the capability to perform dose assessments on-shift by inserting footnote (a). Consequently, the licensee proposes that the on-shift person, who may be assigned other duties, would be expected to fill this response role until an offsite dose assessor arrives in 75 minutes.

The person selected to occupy the Radiological Assessment responder position would be expected to provide an assessment of the radiological consequences of an accident to decision makers for event classification and protective action recommendations. The licensee indicated that they will fill this position with a person possessing the expertise to perform the function, including providing an assessment of the radiological consequences of an accident to decision makers for event classification and protective action recommendations. The EP would require that individuals assigned this emergency task would be trained to perform this task.

CONCLUSION: Based on the staff's acceptance of the proposed extended augmentation times and dose assessment in Sections 4.3 and 4.4, respectively, the staff concludes that proposed Change L8 is acceptable.

L9 Augment selected positions as soon as possible (without delay) but at no later than 75 minutes. The change is made by the addition of footnote (g) to Table 5-1 which will state that these personnel will report and augment shift personnel as soon as possible, without delay, but no later than 75 minutes.

JUSTIFICATION: The licensee proposed this change in its April 6, 2000, letter in response to staff's concerns involving both the augmentation of the on-shift staff in 90 minutes and fully operational times for both the emergency operations facility (EOF) and the technical support center (TSC) in 90 minutes. The licensee indicated this change would be made by adding footnote "g" to Table 5-1 which would state: "(g) These personnel will report and augment shift personnel in 75 minutes." The five positions which would be affected are On-Call Manager, TSC Coordinator/Operations Coordinator/SRO/STA, Communicators (two), and Radiological Assessment. During the November, 1999, meeting, the staff provided some of the criteria it would rely upon for evaluating proposals to extend a licensee's capability to augment the on-shift staffing. The licensee provided additional information in its April 6, 2000, letter addressing these criteria. The staff's evaluation of that information and basis for accepting the extension of the licensee's capability to augment the on-shift staff in 75 and 90 minutes is discussed in Section 4.3. Extending the times for both the EOF and TSC are discussed in Section 4.6.

CONCLUSION: Based on the staff's acceptance of the proposed extended on-shift emergency staff augmentation and extended ERF operational times in Sections 4.3 and 4.6, respectively, the staff concludes that proposed Change L9 is acceptable.

CONCLUSION: The staff concludes that the change clarifies the EP so that it will be clear that the emergency director can request additional resources as deemed necessary up to and including activation of the emergency organization as required. Based on this, the staff also concludes that the proposed change does not decrease the effectiveness of the EP and, therefore, did not require staff approval for implementation.

- A21 Retitle “TSC/EOF Dose Calculator” in EP Section 5.4.19 to “Radiological Assessment Dose Calculator” and add the following sentence to the end of the section: “This function may be performed by on-shift personnel and it is also an augmented function.”

JUSTIFICATION: The licensee stated that the proposed change in EP Section 5.4.19 reflects the current practice to allow onsite personnel to perform radiological assessments and thus clarifies the EP and does not alter any requirements in the EP.

CONCLUSION: The staff concludes that the change clarifies the EP. Based on this, the staff also concludes that the proposed change does not decrease the effectiveness of the EP and, therefore, did not require staff approval for implementation.

- A22 Add new sentence to EP Section 5.4.2 as follows: “h. The Shift Superintendent will resume Control Room duties upon relief by the augmenting Emergency Director when the TSC is declared operational.”

JUSTIFICATION: The licensee stated that the proposed change corrects the EP section to be consistent with Change A8 to EP Table 5-1. During the initial stages of an event, the “Shift Superintendent (SRO)” in EP Table 5-1 is also responsible for the major functional area of Emergency Direction and Control. The On-Call Manager assumes this duty after the TSC is operational, which allows the “Shift Superintendent (SRO)” to perform other operational emergency duties. The addition of the sentence to EP Section 5.4.2 will provide clarification that the shift superintendent is relieved of the Emergency Direction and Control duties and resumes plant operational duties.

CONCLUSION: The licensee added the words “when the TSC is operational.” Activation (augmentation, operational, or fully operational) for ERFs is classification dependent whereas the licensee’s capability to augment the on-shift staff (emergency director) is dependent upon any emergency. Change A20 indicates additional resources can be requested as required. These two changes appear to conflict with each other; however it is the staff’s understanding that the on-shift Emergency Director could be augmented with an on-call manager in 75 minutes (in 45 minutes if personnel are onsite) until the TSC is operational. Based on this the staff concludes that proposed Change A22 is acceptable. See change R4.

- A23 Add the definition of “Augmentation” to EP Section 1.0.

JUSTIFICATION: The licensee stated that the change added a new definition to EP Section 1.0 to clarify the EP by providing a clear understanding of what augmentation means in the proposed plan changes, such as Change L3. The new definition does not impose any new requirements.

initial protective actions probably would be based initially upon plant conditions. Although event classification and initial protective actions would likely be based initially upon plant

conditions, allowing a non-dedicated person on-shift to perform dose assessments is also based upon licensees having the capability to add a dedicated Dose Assessor in 30 minutes to relieve this on-shift person. Therefore, having a dose assessment or the ease in performing a dose assessment capability on-shift does not, in itself, provide a commensurate reduction in the bases for having the capability to add a Dose Assessor in 30 minutes.

In the initial proposal, the licensee did not indicate that the augmenting dose assessor responder would possess the expertise of a Health Physics Supervisor. The person selected to occupy the Radiological Assessment position would be expected to provide an assessment of the radiological consequences of an accident to decision makers for event classification and protective action recommendations. The licensee indicated that they will fill this position with a person possessing the expertise to perform the function, including providing an assessment of the radiological consequences of an accident to decision makers for event classification and protective action recommendations. The EP would require that individuals assigned this emergency task would be trained to perform this task.

The licensee modified its proposal to augment the on-shift dose assessment with an offsite dose assessment responder in 75 minutes as indicated in a letter dated April 6, 2000. The licensee also stated that the on-shift Chemistry Technician would have the capability to perform dose assessments using real time meteorology.

Based on the staff's evaluation of the information provided by the licensee discussed above, the staff determined that the licensee's proposal for dose assessment is acceptable.

4.5 Shared Non-Collateral Tasks

In its application, the licensee proposed to increase the number of on-shift emergency staff positions allowed to be assigned non-collateral emergency tasks until the on-shift emergency staff is augmented. For the review of the proposed EP changes, non-collateral tasks are tasks that are not considered alike or similar, and would require a different education or training. In reviewing this sharing of tasks, the staff understands that (1) augmentation of the on-shift emergency staff is proposed to be as soon as possible (without delay) but not later than 75 or 90 minutes if the personnel needed must come from offsite, and not more than 45 minutes if the personnel needed are onsite, and (2) the licensee would have the capability to augment the on-shift staff when it is needed instead of being tied to an emergency classification. Therefore, the actual time when the non-collateral tasks are being shared is not simply the difference between 30 and 60 minutes in the current EP Table 5-1 and the 75 and 90 minutes proposed by the licensee.

In the proposed EP Table 5-1, the tasks identified as being shared are those annotated with footnote (a) (of the April 6, 2000, letter). The footnote applies to the following four position titles or expertise: radiological assessment for offsite dose assessment, radwaste operator for repair and corrective actions, shift personnel operations for firefighting, and shift personnel for rescue and first aid.