

July 24, 2001

MEMORANDUM TO: File

FROM: S. Patrick Sekerak, Project Manager, Section 1 /RA/
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 (GGNS) - TELEPHONE
CONFERENCES RE: TECHNICAL SPECIFICATION CHANGES FOR
EMERGENCY DIESEL GENERATOR LUBE OIL INVENTORIES (TAC
NO. MB0423)

REFERENCE: 1. Letter (GNRO-2001/00048) from Entergy Operations, Inc. (EOI),
to U.S. Nuclear Regulatory Commission (NRC or the staff),
"Response to Request for Additional Information re: Revision of
Technical Specifications for Emergency Diesel Generator Lube
Oil Inventory," dated June 18, 2001.

On July 9 and 10, 2001, telephone conferences were conducted to provide the staff with additional explanation of fire hazards evaluation issues, provided in Reference 1, related to EOI's Technical Specification (TS) change request dated October 24, 2000. Notes from the telephone conferences are included in the attachment, provided to document discussions between representatives of GGNS personnel and the staff.

The discussion during the telephone conferences provided the staff with technical information which is pertinent to the staff's safety evaluation of EOI's TS change request.

Attachment: As Stated

Docket No. 50-416

**Notes from Telephone Conferences
July 9 and 10, 2001**

Subject: Grand Gulf Nuclear Station (GGNS) - Clarification of Entergy Operations, Inc. (the licensee) response, dated June 18, 2001, to U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation (NRR) staff Request for Additional Information (RAI), dated April 12, 2001, re: Technical Specification changes for diesel generator (DG) lube oil inventories (TAC No. MB0423)

Participants: Tanya Eaton, NRR
Patrick Sekerak, NRR
Lonnie Daughtery, GGNS
Michael Cumbest, GGNS
David Wilson, GGNS
Walter Cade, GGNS
Jerry Roberts, GGNS

Discussion:

Issue 1

In RAI response 2.c, the licensee stated that the three 55 gallon barrels are stored in a welded steel tank/pan capable of holding 110% of the contents of the barrels, and that the increased combustible load only added an additional 15 minutes to the initial fire duration of 45 minutes. As an input to the independent verification of the licensee's fire duration calculation, the staff asked the licensee to provide the dimensions of the welded steel pan during the telephone conference on July 9, 2001. The licensee stated that the internal dimensions for length, width, and height of the steel tank/pan containing the oil in the event of a spill are 47 ½" x 47 ½" x 19". The outside dimensions of the pan are 48" x 48".

Issue 2

In RAI response 2.c, the licensee states that there are specified design requirements to prevent the overturning of the skid, and resultant spillage of the contents. The licensee did not state if the provisions of the National Fire Protection Association (NFPA) 30, "Flammable and Combustible Liquids Code," for safe storage of combustible materials were applied. NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Section 9.5.1, "Fire Protection Program," contains the guidelines to provide assurance, through defense-in-depth, that a fire will not prevent the performance of safe shutdown functions or increase the risk of radioactive releases to the environment. It also contains criteria for evaluating potential fire hazards for safety-related plant areas. Position C.5.d.4, "Control of Combustibles," of NUREG-0800 states that the "storage of flammable liquids should, as a minimum, comply with the requirements of NFPA 30." NFPA 30 includes the minimum requirements for the safe storage and use of a great variety of flammable and combustible liquids commonly available.

In the telephone conference of July 9, 2001, the licensee stated that they applied the guidance of NFPA 30 to fire area 63, particularly with respect to ensuring that sufficient drainage capacity was provided for safe discharge of sprinkler system water, as well as the additional 165 gallons of oil in the event that the steel pan/tank overflows. The staff asked the licensee if they performed calculations to ensure that the drains were adequately sized to accommodate the additional fuel load and the sprinkler suppression system water. The licensee replied that the

existing fire hazards analysis has enough margin to bound the additional fire loading represented by the additional lube oil inventory. In addition, the existing analysis (which includes the sprinkler suppression system/hose stream runoff) bounds the additional fuel load because the drains in fire area 63 were originally designed to handle a greater capacity than is currently being stored. Therefore, since the drains were sized for a larger capacity, the additional fuel load remains bounded by the existing fire hazards analysis.

Issue 3

During the July 9, 2001, telephone conference, the staff asked the licensee to clarify if the room exhaust from the Division III DG room is exhausted into corridor 1D301 (shown in Sketch #1 on page 9 of the licensee's RAI response). The staff's concern was that, in the event of a fire, smoke products would also be exhausted into corridor 1D301 and prevent operator access to the Division I/II DG rooms. The licensee was able to address the staff's concern during a follow-up telephone conference on July 10, 2001. During this conversation, the licensee stated that the ventilation system for fire area 63 takes suction on the west end of the Division III DG room by door 1D312 and exhausts through a vent opening along the east end of the building into corridor 1D301. Fire area 63 has 3-hour rated fire dampers that fuse at 165 °F, which allows the dampers to close to prevent the passage of flames. Corridor 1D301 is an open corridor which vents directly to the outside environment, and would not allow smoke products to build up to prevent access to the Division I/II DG rooms. The licensee noted that additional access to each DG room is available through separate doors located on the west wall of each room, opposite to the corridor 1D301 entrance. This would allow operators to enter the Division I/II DG rooms from the west end of the building, in the event that the smoke in corridor 1D301 hinders access along the east end of the building.

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