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August 3, 2001

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

Subject: River Bend Station
Docket No. 50-458
License No. NPF-47
Response to Request for Additional Information (RAI) - License Amendment Request (LAR) 2000-27, Revise Technical Specification 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)"

References:

1. Letter from Entergy Operations, Inc. (EOI) to USNRC, dated January 24, 2001, License Amendment Request (LAR) 2000-27, "IFTS Operation in Modes 1,2 and 3."

2. Letter from Entergy Operations, Inc. (EOI) to USNRC, dated July 18, 2001, Response to Request For Additional Information (RAI) - License Amendment Request (LAR) 2000-27, Revise Technical Specification 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)."

3. Letter from Entergy Operations, Inc. (EOI) to USNRC, dated November 29, 2000, Response to Request For Additional Information on River Bend License Amendment Request to Permit Removal of the Inclined Fuel Transfer System Blind Flange (TAC No. MA7827)

File Nos.: G9.5, G9.42

RBG-45787
RBF1-01-0162
CNRO-2001-00033

Gentlemen:

By letter dated January 24, 2001, Entergy Operations, Inc. submitted License Amendment Request (LAR) 2000-27. LAR 2000-27 requested that the NRC approve and issue Technical Specification changes to Technical Specification 3.6.1.3, "Primary Containment Isolation Valve

A001

(PCIVs)" related to the Inclined Fuel Transfer System (IFTS) Blind Flange. Based on your review of the submittal and EOI's subsequent response to your Request for Additional Information (RAI) dated July 18, 2001, a follow-up Request for Additional Information (RAI) was forwarded to Entergy. Attachment 1 provides Entergy's response to these additional questions. This document contains new commitments. A commitment identification form is provided in attachment 2. If you have any questions, please contact Mr. Gregory P. Norris at (225) 336-6391.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 3, 2001.

Very truly yours,

MAK / gpn
attachments (2)

cc:

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ATTACHMENT 1

TO

LETTER NO. RBG-45787

LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

1. **Discuss how IFTS operators will demonstrate (minimum of 3) in actual or simulated conditions each of the tasks required to manually close the IFTS bottom valve, re-position the upender, and manually operate the IFTS winch, under expected reduced lighting conditions in the event of a loss of offsite power. Explain the methods that will be used to estimate and create the expected lighting conditions.**

   Entergy will perform demonstrations of the operator tasks required to enable closure of the IFTS bottom valve following a loss of off-site power prior to the use of the requested amendment. For the process of manually closing the IFTS bottom valve during a loss of offsite power, it will be assumed that the carriage is in the lower pool and upended to the vertical position. From this position, the steps for closing the IFTS bottom valve include: 1) the manual repositioning of the lower upender to the inclined position, 2) manual operation of the IFTS winch to raise the carriage above the bottom valve and 3) manual closure of the IFTS bottom valve. The demonstrations will be performed as subsets of the overall task. Mock-ups will be used to demonstrate the required operator actions for setting up equipment and simulating operation of the IFTS upender, bottom valve and winch.

   For the manual re-positioning of the upender and subsequent manual closure of the IFTS bottom valve, Entergy will demonstrate using a mock-up, in a training facility or other suitable location, that operators can adequately perform the required manipulations, using portable lighting only. No credit for the existing emergency lights installed in the vicinity of the IFTS equipment in the Fuel Building will be taken during the demonstration. This demonstration will include required valve manipulations, connection of fittings/hoses, and the set-up of a manual pump in an area with no lighting other than the portable lighting that will be staged in the plant. Two operators, who normally work as the IFTS Operator and Fuel Handling Bridge Operator, will perform the demonstration using draft procedures. The mock-up will demonstrate the operator actions required to set up for manual operation of the bottom valve and upender. The demonstration will not include the actual operation of an IFTS bottom valve or upender. These mock-up demonstrations will be performed a minimum of 3 times using different operators.

   Regarding manual operation of IFTS winch, Entergy will demonstrate using a winch mock-up, in a training facility or other suitable location, that operators can adequately perform the required manipulations, using portable lighting only. No credit for the existing emergency lights, installed in the vicinity of the IFTS winch inside the Containment, will be taken during the simulation. Two operators, who normally work as the IFTS Operator and Refueling Bridge Operator, will perform the demonstration using draft procedures. The mock-up will demonstrate the removal of access covers, installation of a strong-back on the winch drum brake, installation of the winch motor hand-wheel and release of the motor brake, in an area with no lighting other than the portable lighting that will be staged in the plant. Entergy will use an actual winch cover in the mock-up demonstration. Winch operation to raise the carriage will be simulated only. The mock-up demonstrations will be performed at least 3

times using different operators.

Communications during the mock-up demonstrations will also be simulated. During actual operation of the IFTS in Modes 1, 2 or 3, Entergy will utilize the wireless communication equipment that is normally utilized for refueling activities as described in Reference 3.

Emergency lighting in the IFTS areas of the Fuel Building and Containment is installed to provide a means of egress and exit from those areas. River Bend's Updated Safety Analysis Report (USAR) Table 9.5-2 shows that 0.5 foot-candles is required for this purpose.

In the Fuel Building 113 ft. el., there are three emergency light fixtures, positioned on the north, east and south walls, around the pools. Entergy will stage the portable lighting and equipment required for the contingency actions within the area illuminated by the emergency lighting on the east wall of the Fuel Building, which is nearest the IFTS control panel. Staging of this equipment will be completed prior to opening the IFTS bottom valve with the IFTS blind flange removed in Modes 1, 2 or 3. Entergy considers the existing emergency lighting to be adequate to enable the IFTS operators to retrieve and utilize the portable lighting that will be staged for their use in performing these contingency actions.

In the Containment, an emergency light fixture is currently installed on the wall above the IFTS control panel. As in the Fuel Building, the portable lighting and equipment required for performing the contingency actions will be staged in the area illuminated by this emergency lighting fixture.

With respect to portable lighting that will be staged for use in the bottom valve closure contingency, Entergy will test that portable lighting to ensure that it is functional, prior to beginning IFTS operation each day that the IFTS bottom valve will be opened. Entergy will also ensure that fresh spare batteries are staged with the portable lighting.

2. Discuss the testing to ensure that the manually operated hydraulic pump will effectively close the IFTS bottom valve and reposition the IFTS upender.

Following installation of the required modifications in the plant, post-modification testing will be performed to demonstrate that a manual pumping device connected to the IFTS hydraulic lines will re-position the upender and close the bottom valve as required. In general, the testing will involve the isolation of the hydraulic system, connection of a manual pump mechanism to the IFTS hydraulic lines and actual manual operation of the bottom valve and upender. This testing can be performed with the IFTS blind flange installed and will likely involve several cycles of the bottom valve and lower upender in the process. Information obtained during the performance of post-modification testing will be incorporated into procedures as necessary to ensure that adequate criteria is provided to the IFTS Operators

for determining the position of each piece of equipment.

Following post-modification testing and final procedure development, IFTS Operators will perform walk-throughs of the contingency actions, using approved procedures, as a part of their training.

ATTACHMENT 2

TO

LETTER NO. RBG-45787

LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

Attachment 2
Commitment Identification Form

Commitment	One-Time Action	Continuing Compliance
Entergy will perform demonstrations of specific operator actions required to close the IFTS bottom valve following a loss of off-site power prior to the use of the requested amendment. The demonstrations will be performed as subsets of the overall task. Mock-ups will be used to demonstrate the required operator actions for setting up equipment and simulating operation of the IFTS upender, bottom valve and winch. For the manual re-positioning of the upender and subsequent manual closure of the IFTS bottom valve, Entergy will demonstrate using a mock-up, in a training facility or other suitable location, that operators can adequately perform the required manipulations, using portable lighting only. No credit for the existing emergency lights installed in the vicinity of the IFTS equipment in the Fuel Building will be taken during the demonstration. This demonstration will include required valve manipulations, connection of fittings/hoses, and the set-up of a manual pump in an area with no lighting other than the portable lighting that will be staged in the plant. Two operators, who normally work as the IFTS Operator and Fuel Handling Bridge Operator, will perform the demonstration using draft procedures. The mock-up will demonstrate the operator actions required to set up for manual operation of the bottom valve and upender, but, the demonstrations will not include the actual operation of an IFTS bottom valve or upender. These mock-up demonstrations will be performed a minimum of 3 times using different IFTS operators. Regarding manual operation of IFTS winch, Entergy will demonstrate using a winch mock-up, in a training facility or other suitable location, that operators can adequately perform the required manipulations, using portable lighting only. No credit for the existing emergency lights, installed in the vicinity of the IFTS winch inside the Containment, will be taken during the simulation. Two operators, who normally work as the IFTS Operator and Refueling Bridge Operator, will perform the demonstrations using draft procedures. The mock-up will demonstrate the removal of access covers, installation of a strong-back on the winch drum brake, installation of the winch motor hand-wheel and release of the motor brake, in an area with no lighting other than the portable lighting that will be staged in the plant. Entergy will use an actual winch cover in the mock-up demonstration. Winch operation to raise the carriage will be simulated only. The mock-up demonstrations will be performed at least 3 times using different IFTS operators.	X	

Commitment	One-Time Action	Continuing Compliance
During actual operation of the IFTS in Modes 1, 2 or 3, Entergy will utilize the wireless communication equipment that is normally utilized for refueling activities as described in Reference 3.		X
Entergy will stage the portable lighting and equipment required for the contingency actions within the area illuminated by the emergency lighting on the east wall of the Fuel Building, which is nearest the IFTS control panel. Staging of this equipment will be completed prior to opening the IFTS bottom valve with the IFTS blind flange removed in Modes 1, 2 or 3.		X
In the Containment, an emergency light fixture is currently installed on the wall above the IFTS control panel. As in the Fuel Building, the portable lighting and equipment required for performing the contingency actions will be staged in the area illuminated by this emergency lighting fixture.		X
With respect to portable lighting that will be staged for use in the bottom valve closure contingency, Entergy will test that portable lighting to ensure that it is functional, prior to beginning IFTS operation each day that the IFTS bottom valve will be opened. Entergy will also ensure that fresh spare batteries are staged with the portable lighting.		X
Following installation of the required modifications in the plant, post-modification testing will be performed to demonstrate that a manual pumping device connected to the IFTS hydraulic lines will re-position the upender and close the bottom valve as required. Information obtained during the performance of post-modification testing will be incorporated into procedures as necessary to ensure that adequate criteria is provided to the IFTS Operators for determining the position of each piece of equipment.	X	
Following post-modification testing and final procedure development, IFTS Operators will perform walk-throughs of the contingency actions, using approved procedures, as a part of their training.		X