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**Rick J. King**  
Director  
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August 07, 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  
Supplement to License Amendment Request (LAR) 2000-24, "Operational  
Conditions For Handling Irradiated Fuel in the Primary Containment"

References:

1. Letter from Entergy Operations, Inc. (EOI) to USNRC, dated January 24, 2001, License Amendment Request (LAR) 2000-24, "Operational Conditions For Handling Irradiated Fuel in the Primary Containment"
2. Letter from EOI to USNRC, dated July 20, 2001, LAR 2000-24 Rev. 1, "Operational Conditions For Handling Irradiated Fuel in the Primary Containment"

File Nos.: G9.5, G9.42

RBF1-01-0163  
RBG-45784

Gentlemen:

This letter is submitted to provide clarification of information contained in Reference 2 as discussed in recent teleconferences with the NRC staff. On January 24, 2001, Entergy submitted a License Amendment Request, LAR 2000-024, for Technical Specification changes concerning certain operational conditions required when conducting core alterations or handling irradiated fuel in the primary containment (Reference 1). Reference 2 was submitted as a revision to LAR 2000-024 to provide additional information and address issues raised during a meeting with the staff on May 9, 2001. Subsequently, the NRC staff initiated teleconferences on July 26, 2001 and August 6, 2001 to obtain clarification of certain information provided by Reference 2. Attachment 1 to this letter provides clarification of the information as discussed in the teleconferences.

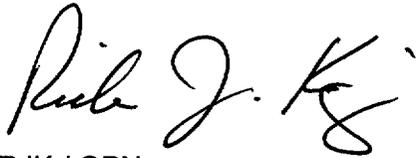
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This document contains no new commitments. If you have any questions, please contact Mr. Ron Byrd at (601) 368-5792.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 07, 2001.

Very truly yours,

A handwritten signature in black ink, appearing to read "Rick J. King". The signature is written in a cursive style with a large initial "R" and a distinct "K".

RJK / GPN  
Attachment (1)

cc:

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**ATTACHMENT 1**

**TO**

**LETTER NO. RBG-45784**

**LICENSE NO. NPF-47**

**ENERGY OPERATIONS, INC.**

**DOCKET NO. 50-458**

### **Item 1 Needing Clarification**

Attachment 2 to Reference 2, page 2 of 14 states:

“Entergy also proposes to delete OL condition 2.C.(17). This condition is no longer needed for opened air locks or any other primary containment openings because 10CFR50.65(a)(4) now requires licensees to assess and manage the risk associated with SSCs being removed from service during normal shutdown operations.”

### **Clarification**

Entergy has committed to implement administrative controls in accordance with TSTF-51 to manage the impact of an open containment configuration, including the containment airlocks. Since the administrative controls stipulated in TSTF-51 and committed to by Entergy are not credited in the FHA analysis, the incorporation of these controls into a license condition is not warranted and would not be consistent with the TSTF. It is this commitment in conjunction with the current FHA analysis that alleviates the need for a license condition regarding the containment airlocks.

As stated in the cover letter of Reference 2, Entergy submitted the LAR revision to make commitments to compensatory actions as delineated in TSTF-51 in lieu of relying on the maintenance rule, 10 CFR 50.65(a)(4), as a basis for managing the impact of an open containment configuration. This also applies to the justification for deleting License Condition 2.C.(17). Entergy decided to make this change after being informed that the maintenance rule justification would take longer to review than the current TSTF approach. The subject statements were not intended to be left in the application as a sole basis for deleting the license condition. Even though this statement was not revised, pages 9 and 10 of Attachment 2 to Reference 2 were revised to better summarize the basis for the change:

“In summary, Entergy concludes that the requirements for primary containment may be relaxed during CORE ALTERATIONS and when handling irradiated fuel in the primary containment that has undergone a natural decay period of 11 days and that license condition 2.C (17) may be deleted based on the following.

- The only accident postulated to occur during CORE ALTERATIONS that results in fuel damage and radioactive release is the FHA. The other accidents postulated to occur, such as inadvertent criticality or the inadvertent loading of and subsequent operation with a fuel assembly in an improper location, are not postulated to result in fuel cladding integrity damage during the shutdown conditions. The proposed changes do not affect the requirements that protect or mitigate a reactor vessel draindown event.

- The current FHA analysis of record demonstrates that containment closure is not required to mitigate the consequences of a FHA once the fuel has undergone a natural decay period of 11 days (i.e., the fuel has not been part of a critical reactor core within the last 11 days). Dose consequences from the analysis remain within the guidelines of the SRP.
- Entergy will implement administrative controls in accordance with the guidelines of NUMARC 93-01 Rev. 3, Section 11.3.6.5. regarding the availability of ventilation and radiation monitor systems and contingency plans for prompt closure of containment openings.”

### **Item 2 Needing Clarification**

Attachment 2 to Reference 2, page 8 of 14 states:

“Entergy will implement these guidelines following approval of the proposed amendment to the Technical Specifications.”

### **Clarification**

The commitments made in Reference 2 will be implemented prior to use of the amendment.

### **Item 3 Needing Clarification**

Attachment 2 to Reference 2, page 9 of 14 states:

“Personnel responsible for closure will be knowledgeable and trained in the procedures for establishing building integrity”

### **Clarification**

The personnel responsible for closure are designated personnel available on-site. The current procedure requires a list of designated closure responders to be maintained for each shift.

#### **Item 4 Needing Clarification**

Attachment 2 to Reference 2, pages 10 and 11 provide a justification for a proposed change to TS 5.5.2 that deletes the Standby Gas Treatment (SGT) system from the list of systems included in the "Primary Coolant Sources Outside Containment" leakage control program. However, the information does not discuss the original basis for including the SGT system in the TS leakage control program.

#### **Clarification**

The SGT system has been included as part of the leakage control program since first issuance of the River Bend TS. Neither the FSAR nor the SER (NUREG 0989) for River Bend provide any insight into the basis for specific inclusion of the SGT system in the program. SER Section 15.9.5, "III.D.1.1 Integrity of Systems Outside Containment Likely To Contain Radioactive Material for Pressurized-Water Reactors and Boiling-Water Reactors" contains no reference to ventilation systems or components other than containment isolation valve leak testing in accordance with 10CFR50 Appendix J. Entergy has identified internal correspondence that discussed removal of the SGT system from the leakage control program prior to initial issuance of the TS. This seems to have gone unresolved at that time due to the progress of the TS approval effort being so near to completion.

The leakage test program required by TS 5.5.2 is implemented for the SGT system by performing a bubble test on the discharge ductwork joints between the fans and the exhaust stack. Scaffolding must be erected to access the ducts to perform the bubble tests. Since the SGT system filters, fans and the discharge ductwork are located within the secondary containment, any leakage from the discharge ductwork would be into the secondary containment. As noted in the original request (Reference 1), the discharge ductwork does not contain "highly radioactive fluids" because the airflow is downstream of the system filters. The HEPA and charcoal filters are tested for penetration and bypass leakage in accordance with TS 5.5.7, the Ventilation Filter Testing Program. Eliminating the SGT system from the TS 5.5.2 program does not affect any of the tests performed pursuant to TS 5.5.7.