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William A. Eaton
Vice President,
Operations
Grand Gulf Nuclear Station

September 18, 2001

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Exemption to 10CFR50.47, 10CFR50 Appendix E III.F.2.c,
and the GGNS Emergency Plan – Biennial Exercise
Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

GNRO-2001/00070

Ladies & Gentlemen:

Due to the ongoing National Security threat in the United States, a one-time exemption in accordance with 10CFR50.12 is requested from the requirements of 10CFR50.47, 10CFR50 Appendix E III.F.2.c, and the GGNS Emergency Plan Section 8.3.2.h. These regulatory requirements direct the performance of a biennial exercise of the GGNS Emergency Plan including full participation by offsite authorities. Grand Gulf meets the requirements for a 10CFR50.12 exemption as follows:

10CFR50.12 (iv) The exemption would result in benefit to the public health and safety that compensates for any decrease in safety that may result from the grant of the exemption.

Based on the present National Security threat, there is a high level of plant security in place as well as public and plant personnel sensitivity to any unusual activities. Because of this Grand Gulf is concerned that the performance of an Emergency Plan Exercise may result in undue stress and risk to the general public and plant personnel (Attachment I.A). The removal of this risk is a benefit to the public health and safety.

Grand Gulf has routinely conducted drills of the Emergency Plan, which have been monitored for performance (Attachment I.B). Based on our assessment of drill performance, there will be no decrease in safety as a result of this exemption.

10CFR50.12 (vi) There is present any other material circumstance not considered when the regulation was adopted for which it would be in the public interest to grant an exemption. If such condition is relied on exclusively for satisfying paragraph (a)(2) of this section, the exemption may not be granted until the Executive Director for Operations has consulted with the Commission."

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Grand Gulf is also concerned with the possible effects performing an exercise will have on the local, state, and federal governments. It is in the best interest of the public to allow these government agencies to fully focus on the current National Security threat without any unnecessary distractions.

Additionally an exemption is needed because the ability to predict when the need for heightened security measures will end along with the logistics of scheduling another date will result in exceeding the required time limit for performing the graded exercise imposed by the regulation.

Conclusion

A one-time exemption from the biennial exercise will not present any undue risk to public health and safety and is necessary to support the common defense and security. The following items provide the basis for why there is no undue risk:

- On August 20, 2001, Grand Gulf met the requirement to conduct a full participation exercise with the exception of observations by the NRC and FEMA.
- Past exercises have not found any significant weaknesses related to emergency response capabilities (Attachment I.B).
- We have conducted 10 emergency drills since the last graded exercise. These drills have adequately demonstrated the capability of onsite and offsite personnel.
- There are no issues or implication that emergency response capabilities will be diminished as a result of the exemption.

This exemption would allow Grand Gulf Nuclear Station to conduct a biennial exercise of the Emergency Plan in calendar year 2002 on a date that is agreeable between Grand Gulf Nuclear Station, the NRC, and other affected agencies. The date of the rescheduled exercise would be used as the starting point for the two-year biennial cycle.

Due to the exercise being scheduled for the week of September 17 – 21, 2001 it is requested that this request be handled on an expedited review basis. If you have questions in regard to this exemption request please feel free to call Charles Bottemiller at 601-437-6299.

Yours truly,



WAE/CAB/MJL
attachment:

cc: (See Next Page)

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cc: INSERT FROM DESKTOP

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

Mr. E. W. Merschoff (w/2) Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011	ALL LETTERS
Mr. S. P. Sekerak, NRR/DLPM/PD IV-1 (w/2) ATTN: ADDRESSEE ONLY U.S. Nuclear Regulatory Commission One White Flint North, Mail Stop O7-D1 11555 Rockville Pike Rockville, MD 20852-2378	ALL LETTERS

LICENSEE-IDENTIFIED COMMITMENTS

Letter #:	GNRO-2001/00070		
COMMITMENT	TYPE <small>(Check only one type)</small>		SCHEDULED
	ONE-TIME ACTION	CONTINUING COMPLIANCE	COMPLETION DATE <small>(If Required)</small>
This exemption would allow Grand Gulf Nuclear Station to conduct a biennial exercise of the Emergency Plan in calendar year 2002 on a date that is agreeable between Grand Gulf Nuclear Station, the NRC, and other affected agencies. The date of the rescheduled exercise would be used as the starting point for the two year biennial cycle.	X		2002

Attachment 1 to GNRO 2001/00070

A. Examples of issues that have occurred during previous drills at GGNS or other nuclear facilities that have the potential to cause undue concern and risk to the public include:

- Inadvertent siren activation,
- Members of the public hearing drill statements being made at the News Media Center and not recognizing the statements were in reference to a drill,
- Radio messages received by the public (through the use of scanners) that were not recognized as being drill related,
- Off-Site Monitoring Teams performing radiation monitoring activities causing public concern.

There may be additional risks associated with onsite and near-site activities in relation to the current high level of security.

B. The last biennial exercise for GGNS was conducted on June 23, 1999, and is detailed in NRC Inspection Report No. 50-416/99-07. During this exercise, good overall performance was identified and only one weakness was documented.

Since the June 23, 1999 exercise, GGNS has conducted 10 emergency preparedness drills, each requiring the full activation of all emergency facilities. This exceeds the requirements for drills as identified in 10CFR50 App. E. Section III F.2.b. During these drills, deficiencies were identified and entered into the GGNS corrective action process. One issue was identified during this period that may have warranted an exercise weakness. This issue was in the area of communications between facilities and was also identified in the station's corrective action process. Each of these drills involved some level of participation with State and Local Authorities with the most recent drill receiving full participation from State and Local authorities from the States of Mississippi and Louisiana.

During the drill conducted on August 20, 2001, all attributes of a NRC Graded Exercise were observed with the exception of observations by the NRC and FEMA. This drill was conducted as an evaluated drill without coaching or on the spot correction of issues from the Controller/Evaluator Team. In addition, the drill was monitored by the GGNS Quality Assurance Department.