

**Grand Gulf Nuclear Station (GGNS)**

**License Amendment Request re: Upper Containment Pool Draining  
While in Reactor Operating MODE 3**

**(Ref. GNRO-2002/00011 dated February 25, 2002)**

During review of the proposed changes in the referenced submittal, the NRC Operator Licensing and Human Performance Section (IOHS) staff has prepared the following DRAFT questions for discussion and clarification during a forthcoming telephone conference.

The following questions relate to the time period during MODE 3 that the reactor cavity portion of the upper containment pool (UCP) is drained:

1. Contrast the amount of response time available prior to manual action for the operator in the control room between situation 1 and situation 2, where situation 1 is a LOCA in MODE 3 with water in the UCP, and situation 2 is a LOCA in MODE 3 without water in the UCP. Discuss the consequences of a failure on the part of the operator to take action under the two types of situations.
2. Describe any **new** operator actions required as a result of a LOCA in MODE 3 with the UCP drained.
3. Describe any changes to any current operator actions covered by emergency (EOPs) or abnormal procedures that may occur as a result of this amendment. Describe any evaluation of the EOPs for potential modifications.
4. With regard to the maximum time available prior to mandatory manual action by the operator to control water level in the reactor for the two situations discussed above, describe information required by the control room operator to determine whether such operator action is required. What is the ability to recover from credible errors in performance of manual actions, and the expected time required to make such a recovery?
5. Describe the difference in the level of difficulty with respect to any manual actions between the two situations discussed above? Under this amendment, what is the band of water level in the reactor that must be controlled by the operator?
6. Describe any changes the proposed amendment will have on the operator training program, and provide the implementation schedule for making the changes.