

September 10, 1987

Docket No.: 50-416

Mr. Oliver D. Kingsley, Jr.  
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Dear Mr. Kingsley:

SUBJECT: CHANGES TO TECHNICAL SPECIFICATIONS REGARDING CORE ALTERATIONS AND  
SNUBBER SAMPLE SIZE (TAC NO. 65511)

RE: GRAND GULF NUCLEAR STATION, UNIT 1

The Commission has issued the enclosed Amendment No. 35 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated June 3, 1987, as supplemented June 22, 1987.

This amendment changes the definition of core alteration in the TSs to include certain exceptions and changes footnotes in the TSs to be consistent with the new definition. This amendment also changes a snubber surveillance test sample plan in the TSs by decreasing the number of additional snubbers required to be tested from 10% to 5% for each snubber in the initial test sample that fails to meet specified functional test criteria.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

Lester L. Kintner, Project Manager  
Project Directorate II-2  
Division of Reactor Projects-I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 35 to NPF-29
2. Safety Evaluation

cc w/enclosures:

See next page

DMiller  
9/2/87

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LKintner  
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OGC  
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D:PD22  
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System Energy Resources, Inc.

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MISSISSIPPI POWER & LIGHT COMPANY  
SYSTEM ENERGY RESOURCES, INC.  
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION  
DOCKET NO. 50-416  
GRAND GULF NUCLEAR STATION, UNIT 1  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 35  
License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that
  - A. The application for amendment by Mississippi Power & Light Company, System Energy Resources, Inc. (formerly Middle South Energy, Inc.) and South Mississippi Electric Power Association, (the licensees) dated June 3, 1987, as supplemented June 22, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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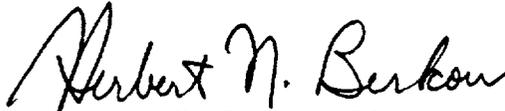
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-29 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 35, are hereby incorporated into this license. System Energy Resources, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects-I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: September 10, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 35

FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. The corresponding overleaf page(s) have been provided to maintain document completeness.

<u>Remove</u>	<u>Insert</u>
1-2	1-2
3/4 1-1	3/4 1-1
3/4 1-7	3/4 1-7
3/4 3-4	3/4 3-4
3/4 7-11	3/4 7-11
3/4 9-3	3/4 9-3
3/4 9-7	3/4 9-7
B3/4 7-3	B3/4 7-3

## 1.0 DEFINITIONS

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The following terms are defined so that uniform interpretation of these specifications may be achieved. The defined terms appear in capitalized type and shall be applicable throughout these Technical Specifications.

### ACTION

1.1 ACTION shall be that part of a Specification which prescribes remedial measures required under designated conditions.

### AVERAGE PLANAR EXPOSURE

1.2 The AVERAGE PLANAR EXPOSURE shall be applicable to a specific planar height and is equal to the sum of the exposure of all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle.

### AVERAGE PLANAR LINEAR HEAT GENERATION RATE

1.3 The AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) shall be applicable to a specific planar height and is equal to the sum of the LINEAR HEAT GENERATION RATES for all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle.

### CHANNEL CALIBRATION

1.4 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

### CHANNEL CHECK

1.5 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

### CHANNEL FUNCTIONAL TEST

1.6 A CHANNEL FUNCTIONAL TEST shall be:

- a. Analog channels - the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions and channel failure trips.
- b. Bistable channels - the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

The CHANNEL FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is tested.

### 3/4.1 REACTIVITY CONTROL SYSTEMS

#### 3/4.1.1 SHUTDOWN MARGIN

##### LIMITING CONDITION FOR OPERATION

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3.1.1 The SHUTDOWN MARGIN shall be equal to or greater than:

- a. 0.38% delta k/k with the highest worth rod analytically determined, or
- b. 0.28% delta k/k with the highest worth rod determined by test.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4 and 5.

##### ACTION:

With the SHUTDOWN MARGIN less than specified:

- a. In OPERATIONAL CONDITION 1 or 2, reestablish the required SHUTDOWN MARGIN within 6 hours or be in at least HOT SHUTDOWN within the next 12 hours.
- b. In OPERATIONAL CONDITION 3 or 4, immediately verify all insertable control rods to be inserted and suspend all activities that could reduce the SHUTDOWN MARGIN. In OPERATIONAL CONDITION 4, establish SECONDARY CONTAINMENT INTEGRITY within 8 hours.
- c. In OPERATIONAL CONDITION 5, suspend CORE ALTERATIONS and other activities that could reduce the SHUTDOWN MARGIN and insert all insertable control rods within 1 hour. Establish SECONDARY CONTAINMENT INTEGRITY within 8 hours.

##### SURVEILLANCE REQUIREMENTS

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4.1.1 The SHUTDOWN MARGIN shall be determined to be equal to or greater than specified at any time during the fuel cycle:

- a. By measurement, prior to or during the first startup after each refueling.
- b. By measurement, within 500 MWD/T prior to the core average exposure at which the predicted SHUTDOWN MARGIN, including uncertainties and calculation biases, is equal to the specified limit.
- c. Within 12 hours after detection of a withdrawn control rod that is immovable, as a result of excessive friction or mechanical interference, or is untrippable, except that the above required SHUTDOWN MARGIN shall be verified acceptable with an increased allowance for the withdrawn worth of the immovable or untrippable control rod.

## REACTIVITY CONTROL SYSTEMS

### LIMITING CONDITION FOR OPERATION (Continued)

#### ACTION: (Continued)

- b. With a "slow" control rod(s) not satisfying ACTION a.1, above:
1. Declare the "slow" control rod(s) inoperable, and
  2. Perform the Surveillance Requirements of Specification 4.1.3.2.c at least once per 60 days when operation is continued with three or more "slow" control rods declared inoperable.
- Otherwise, be in at least HOT SHUTDOWN within 12 hours.
- c. With the maximum scram insertion time of one or more control rods exceeding the maximum scram insertion time limits of Specification 3.1.3.2 as determined by Specification 4.1.3.2.c, operation may continue provided that:
1. "Slow" control rods, i.e., those which exceed the limits of Specification 3.1.3.2, do not make up more than 20% of the 10% sample of control rods tested.
  2. Each of these "slow" control rods satisfies the limits of ACTION a.1.
  3. The eight adjacent control rods surrounding each "slow" control rod are:
    - a) Demonstrated through measurement within 12 hours to satisfy the maximum scram insertion time limits of Specification 3.1.3.2, and
    - b) OPERABLE.
  4. The total number of "slow" control rods, as determined by Specification 4.1.3.2.c, when added to the sum of ACTION a.3, as determined by Specification 4.1.3.2.a and b, does not exceed 7.
- Otherwise, be in at least HOT SHUTDOWN within 12 hours.
- d. The provisions of Specification 3.0.4 are not applicable.

### SURVEILLANCE REQUIREMENTS

- 4.1.3.2 The maximum insertion time of the control rods shall be demonstrated through measurement with reactor coolant pressure greater than or equal to 950 psig and, during single control rod scram time tests, the control rod drive pumps isolated from the accumulators:
- a. For all control rods prior to THERMAL POWER exceeding 40% of RATED THERMAL POWER following CORE ALTERATIONS\* or after a reactor shutdown that is greater than 120 days,
  - b. For specifically affected individual control rods\*\* following maintenance on or modification to the control rod or control rod drive system which could affect the scram insertion time of those specific control rods, and
  - c. For at least 10% of the control rods, on a rotating basis, at least once per 120 days of POWER OPERATION.

\*Except normal control rod movement.

\*\*The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 2 provided this surveillance is completed prior to entry into OPERATIONAL CONDITION 1.

TABLE 3.3.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (a)</u>	<u>ACTION</u>
9. Scram Discharge Volume Water Level - High			
a. Transmitter/Trip Unit	1, 2, 5(g)	2 2	1 3
b. Float Switch	1, 2, 5(g)	2 2	1 3
10. Turbine Stop Valve - Closure	1(h)	4	6
11. Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low	1(h)	2	6
12. Reactor Mode Switch Shutdown Position	1, 2 3, 4 5	2 2 2	1 7 3
13. Manual Scram	1, 2 3, 4 5	2 2 2	1 8 9

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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#### e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans for each type of snubber. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.4.f, an additional 5% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or
- 2) A representative sample of each type of snubber shall be functionally tested in accordance with Figure 4.7.4-1. "C" is the total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.4.f. The cumulative number of snubbers of a type tested is denoted by "N". At the end of each day's testing, the new values of "N" and "C" (previous day's total plus current day's increments) shall be plotted on Figure 4.7.4-1. If at any time the point plotted falls in the "Reject" region all snubbers of that type shall be functionally tested. If at any time the point plotted falls in the "Accept" region, testing of snubbers of that type may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers of that type shall be tested until the point falls in the "Accept" region or the "Reject" region, or all the snubbers of that type have been tested; or
- 3) An initial representative sample of 55 snubbers shall be functionally tested. For each snubber type which does not meet the functional test acceptance criteria, another sample of at least one-half the size of the initial sample shall be tested until the total number tested is equal to the initial sample size multiplied by the factor,  $1 + C/2$ , where "C" is the number of snubbers found which do not meet the functional test acceptance criteria. The results from this sample plan shall be plotted using an "Accept" line which follows the equation  $N = 55(1 + C/2)$ . Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

## REFUELING OPERATIONS

### 3/4.9.2 INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

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3.9.2 At least 2 source range monitor\* (SRM) channels shall be OPERABLE and inserted to the normal operating level with:

- a. Continuous visual indication in the control room,
- b. One of the required SRM detectors located in the quadrant where CORE ALTERATIONS are being performed and the other required SRM detector located in an adjacent quadrant, and
- c. Unless adequate shutdown margin has been demonstrated, the shorting links shall be removed from the RPS circuitry prior to and during the time any control rod is withdrawn.#

APPLICABILITY: OPERATIONAL CONDITION 5.

#### ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS and insert all insertable control rods.

#### SURVEILLANCE REQUIREMENTS

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4.9.2 Each of the above required SRM channels shall be demonstrated OPERABLE by:

- a. At least once per 12 hours:
  1. Performance of a CHANNEL CHECK,
  2. Verifying the detectors are inserted to the normal operating level, and
  3. During CORE ALTERATIONS, verifying that the detector of an OPERABLE SRM channel is located in the core quadrant where CORE ALTERATIONS are being performed and another is located in an adjacent quadrant.

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\* The use of special movable detectors during CORE ALTERATIONS in place of the normal SRM nuclear detectors is permissible as long as these special detectors are connected to the normal SRM circuits.

# Not required for control rods removed per Specification 3.9.10.1 and 3.9.10.2.

## REFUELING OPERATIONS

### 3/4.9.5 COMMUNICATIONS

#### LIMITING CONDITION FOR OPERATION

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3.9.5 Direct communication shall be maintained between the control room and refueling platform personnel.

APPLICABILITY: OPERATIONAL CONDITION 5, during CORE ALTERATIONS.\*

ACTION:

When direct communication between the control room and refueling platform personnel cannot be maintained, immediately suspend CORE ALTERATIONS.\*

#### SURVEILLANCE REQUIREMENTS

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4.9.5 Direct communication between the control room and refueling platform personnel shall be demonstrated within one hour prior to the start of and at least once per 12 hours during CORE ALTERATIONS.\*

\*Except movement of control rods with their normal drive system. |

## PLANT SYSTEMS

### BASES

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#### 3/4.7.4 SNUBBERS (Continued)

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing.

To provide assurance of snubber functional reliability one of three functional testing methods is used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 5% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7.4-1, or
3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 4.7.4-1 was developed using "Wald's Sequential Probability Ratio Plan" described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubbers for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

#### 3/4.7.5 SEALED SOURCE CONTAMINATION

The limitation on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism, i.e., sealed sources within radiation monitoring or boron measuring devices, are considered to be stored and need not be tested unless they are removed from the shielded mechanism.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. NPF-29

MISSISSIPPI POWER & LIGHT COMPANY

SYSTEM ENERGY RESOURCES, INC.

SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

INTRODUCTION

By letter dated June 3, 1987, as supplemented June 22, 1987, System Energy Resources, Inc., (the licensee) requested an amendment to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1 (GGNS-1). The proposed amendment would (1) change the definition of core alteration in the Technical Specifications (TSs) to include certain exceptions and change footnotes in the TSs to be consistent with the new definition; and (2) change a snubber surveillance test sample plan in the TSs by decreasing from 10% to 5% the number of additional snubbers required to be tested for each snubber in the initial test sample that fails to meet specified functional test criteria.

EVALUATION

(1) Definition of Core Alteration

The following changes to the TSs would be made:

- a. The definition of core alteration would be modified to exclude normal movement of the source range monitors (SRMs), intermediate range monitors (IRMs), local power monitors (LPRMs), traversing in-core probes (TIPs) or special movable detectors.
- b. The "\*" footnote to Specification 3.1.1 on shutdown margin would be deleted. This footnote provides an exception to the core alteration definition for movement of IRMs, SRMs or special movable detectors.
- c. The "\*" footnote to Surveillance Requirement 4.1.3.2.a would be modified by deleting the exception to the core alteration definition for the movement of SRMs, IRMs or special movable detectors. The exception for normal control rod movement remains and is not affected by this proposed change.

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- d. The "\*" footnote to Table 3.3.1-1 would be modified by deleting the exceptions to the core alteration definition for IRMs, SRMs or special movable detectors. The part of the "\*" footnote requiring operable SRM instrumentation for replacement of LPRM strings would be retained.
- e. The "\*\*" footnote to Specification 3.9.2 on refueling operations instrumentation would be deleted. This footnote provides an exception to the core alteration definition for movement of IRMs, SRMs, or special movable detectors.
- f. The "\*" footnote to Specification 3.9.5 would be modified by deleting the exception to the core alteration definition for incore instrumentation. The part of the "\*" footnote that allows an exception for control rod movement with their normal drive system remains and is not affected by this proposed change.

The present definition of core alteration is:

"Core alteration shall be the addition, removal, relocation or movement of fuel, sources, incore instruments or reactivity controls within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of core alterations shall not preclude completion of the movement of a component to a safe conservative position."

The proposed change would insert the following after the first sentence:

"Normal movement of the SRMs, IRMs, LPRMs, TIPs, or special movable detectors is not considered a core alteration."

The exception to the present definition of core alteration for the normal movement of the SRMs, IRMs, LPRMs, TIPs, and special movable detectors is needed in certain specifications related to refueling operations in order to preclude unnecessary suspension of the normal movement of these detectors. During a refueling outage, maintenance or modification of equipment can result in TS limiting conditions for operation which require that core alterations be suspended. In the present TSs, exceptions to the definition of core alteration for normal movement of detectors are provided by footnotes in those TSs where a need for the exception was foreseen.

However, some TSs that require suspension of core alterations do not presently have a footnote excepting normal movement of detectors. For example, Specification 3.8.1.2 requires suspension of core alterations with diesel generator 11 or 12 inoperable. With the present TSs, surveillance tests of SRMs and IRMs could not be performed because the tests require movement of the detectors. Making the exception a part of the definition will correct this type of operational problem. Where particular conditions are required for normal movement of detectors, these conditions are retained in the applicable TSs. For example, the requirement for SRMs to be operable when replacing LPRMs is retained in Specification 3/4.3.1, "Reactor Protection System Instrumentation."

The NRC staff has reviewed the proposed changes to the GGNS-1 TSs related to core alterations. The detectors in the SRM, IRM, LPRM, TIP and the special movable detectors are sealed unit fission detectors and their reactivity worth is insignificant with respect to reactivity excursion events. Therefore, allowing the normal movement of these detectors will not significantly increase the probability or consequences of an accident previously analyzed in the Final Safety Analysis Report. The proposed change would only permit normal movement of the incore detectors. Normal movement of these detectors includes insertion and withdrawal using detector drives, replacement of detectors, and movement of special movable detectors in the core region. The addition, removal or relocation of SRMs, IRMs, LPRMs and TIPs would still be prohibited.

The staff concludes that the proposed changes to the definition of core alteration and the deletion of footnotes in the TSs would not significantly reduce the level of safety and would tend to enhance safety by making the TSs more readable. Accordingly, the proposed changes are acceptable.

## (2) Snubber Sample Plan

To verify the operability of safety-related snubbers, Surveillance Requirement 4.7.4.e in the TSs requires functional testing to be performed on a periodic basis. The TSs permit the use of any one of three specified sampling plans. Essentially, all three plans require the testing of an initial sample of snubbers from the total population. For every inoperable snubber identified during testing of an initial sample of snubbers, an additional or subsequential sample is required to be tested. For Sample Plan 1, the size of the initial and the subsequential samples is 10% and 10%, respectively. The initial sample size of 10% for Sample Plan 1 was selected on the basis that every snubber in the plant will be tested at least once every 15 years when the associated functional testing period is 18 months. The subsequential sample size of 10% was selected as a conservative value.

For Sample Plans 2 and 3, initial and subsequential sample sizes are both determined by statistical considerations, and the subsequential samples are half that of the initial samples. All three sample plans should yield the same results. Yet for a population that would produce the same initial sample size for Sample Plans 1 and 2 or 1 and 3, the subsequential sample sizes will differ by twice as much. To make all three plans have an equal basis, the conservatively determined subsequential size of 10% for Sample Plan 1 should be reduced to 5%.

The American Society of Mechanical Engineers Operation and Maintenance Working Group 4 Standard (O&M 4 Standard), "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)," has taken this into consideration and changed the recommended subsequential sample size from 10% to 5% for Sample Plan 1. The standard was approved by the NRC staff and will be adopted by ASME Boiler & Pressure Vessel Code Section XI for plant surveillance guidance.

In conclusion, the proposed change to Sample Plan 1 would make it consistent with the other two sample plans in the TSs, is in accordance with the requirements recommended by the O&M 4 Standard, and is therefore acceptable.

#### ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

Dated: September 10, 1987

#### Principal Contributors:

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