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

February 20, 1992

Docket No. 50-416

Mr. William T. Cottle
Vice President, Operations GGNS
Entergy Operations, Inc.
Post Office Box 756
Port Gibson, Mississippi 39150

Dear Mr. Cottle:

SUBJECT: ISSUANCE OF AMENDMENT NO. 89 TO FACILITY OPERATING LICENSE NO. NPF-29 - GRAND GULF NUCLEAR STATION, UNIT 1 (TAC NO. M80701)

The Nuclear Regulatory Commission has issued the enclosed Amendment No.89 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment revises the Technical Specifications (TS) in response to your application dated June 25, 1991.

The amendment authorizes a one-time extension of the required test interval for overall integrated leak rate tests (ILRTs) (Type A tests) as specified in TS 4.6.1.2.a. The amendment would also delete the TS 4.6.1.2.a requirement coupling the third Type A test to the plant shutdown for the 10-year Inservice Inspection (ISI) outage.

In connection with this action, the Commission has granted an exemption from the requirement, as set forth in 10 CFR Part 50, Appendix J, that the third Type A leak test be performed during the shutdown for the 10-year plant ISI required by Section 50.55a. We find that granting this exemption is justified because application of the regulation in the particular circumstances is not necessary to achieve the underlying purpose of the rule. We further find that compliance would result in undue hardships or other costs that are significantly in excess of those contemplated when the regulation was adopted.

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Docket File

A copy of our related Safety Evaluation and a copy of the exemption from 10 CFR Part 50, Appendix J, are also enclosed. A Notice of Issuance will be included in the Commission's next biweekly Federal Register notice. The exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,

ORIGINAL SIGNED BY

Paul W. O'Connor, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 89 to NPF-29
2. Safety Evaluation
3. Exemption

cc w/enclosures:
See next page

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A copy of our related Safety Evaluation and a copy of the exemption from 10 CFR Part 50, Appendix J, are also enclosed. A Notice of Issuance will be included in the Commission's next biweekly Federal Register notice. The exemption has been forwarded to the Office of the Federal Register for publication.

Sincerely,

Paul W. O'Connor

Paul W. O'Connor, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects - III/IV/V
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1. Amendment No. 89 to NPF-29
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See next page

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Grand Gulf Nuclear Station

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

ENTERGY OPERATIONS, INC.

SYSTEM ENERGY RESOURCES, INC.

SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

MISSISSIPPI POWER AND LIGHT COMPANY

DOCKET NO. 50-416

GRAND GULF NUCLEAR STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 89
License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Entergy Operations, Inc. (the licensee) dated June 25, 1991, 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.

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:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 89 , are hereby incorporated into this license. Entergy Operations, 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

DLWigginton, acting

John T. Larkins, Director
Project Directorate IV-1
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical Specifications

Date of Issuance: February 20, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 89

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 pages are also provided to maintain document completeness.

REMOVE PAGES	INSERT PAGES
3/4 6-3	3/4 6-3
B 3/4 6-1	B 3/4 6-1

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

b. The combined leakage rate for all penetrations and all valves# subject to Type B and C tests to less than or equal to 0.60 L_a, and

c. The leakage rate to less than 100 scf per hour for all four main steam lines through the isolation valves, and

d. The combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 1 gpm times the total number of such valves,

prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR 50 using the methods and provisions of ANSI N45.4 - 1972:

a. Three Type A Overall Integrated Containment Leakage Rate tests shall be conducted at 40 ± 10 month intervals* during shutdown at P_a, 11.5 psig, during each 10-year service period.

b. If any periodic Type A test fails to meet 0.75 L_a, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet 0.75 L_a, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet 0.75 L_a, at which time the above test schedule may be resumed.

c. The accuracy of each Type A test shall be verified by a supplemental test which:

1. Confirms the accuracy of the test by verifying that the containment leakage rate, L'_v, calculated in accordance with ANSI N-45.4-1972, Appendix C, is within 25 percent of the containment leakage rate, L_v, measured prior to the introduction of the superimposed leak.

2. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test.

3. Requires the quantity of gas injected into the containment or bled from the containment during the supplemental test to be between 0.75 L_a and 1.25 L_a.

#Includes all valves listed in Table 3.6.4-1, except for those that are hydrostatically leak tested.

*The third Type A test within the first 10-year service period shall be conducted prior to startup following the sixth refueling outage. This is an exemption from 10 CFR Part 50, Appendix J Requirements.

SURVEILLANCE REQUIREMENTS (Continued)

d. Type B and C tests shall be conducted with gas at P_a, 11.5 psig,* at intervals no greater than 24 months except for tests involving:

1. Air locks,
2. Main steam line isolation valves,
3. Penetrations using continuous leakage monitoring systems,
4. Valves pressurized with fluid from a seal system,
5. Containment isolation valves in hydrostatically tested lines which penetrate the primary containment, and
6. Purge supply and exhaust isolation valves with resilient material seals.

e. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.1.3.

f. Main steam line isolation valves shall be leak tested at least once per 18 months.

g. Type B tests for penetrations employing a continuous leakage monitoring system shall be conducted at P_a, 11.5 psig, at intervals no greater than once per 3 years.

h. Leakage from isolation valves that are sealed with fluid from a seal system may be excluded, subject to the provisions of Appendix J, Section III.C.3, when determining the combined leakage rate provided the seal system and valves are pressurized to at least 1.10 P_a, 12.65 psig, and the seal system capacity is adequate to maintain system pressure for at least 30 days.

i. Containment isolation valves in hydrostatically tested lines which penetrate the primary containment shall be leak tested at least once per 18 months.

j. Purge supply and exhaust isolation valves with resilient material seals shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.1.9.2.

k. The provisions of Specification 4.0.2 are not applicable to Specifications 4.6.1.2.a, 4.6.1.2.b, 4.6.1.2.c, 4.6.1.2.d, 4.6.1.2.e, and 4.6.1.2.g.

*Unless a hydrostatic test is required per Table 3.6.4-1.

3/4.6.1 PRIMARY CONTAINMENT

3/4.6.1.1 PRIMARY CONTAINMENT INTEGRITY

PRIMARY CONTAINMENT INTEGRITY ensures that the release of radioactive materials from the containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with the leakage rate limitation, will limit the site boundary radiation doses to within the limits of 10 CFR Part 100 during accident conditions.

3/4.6.1.2 CONTAINMENT LEAKAGE

The limitations on containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure of 11.5 psig, P_a. As an added conservatism, the measured overall integrated leakage rate is further limited to less than or equal to 0.75 L_a during performance of the periodic tests to account for possible degradation of the containment leakage barriers between leakage tests.

Operating experience with the main steam line isolation valves has indicated that degradation has occasionally occurred in the leak tightness of the valves; therefore the special requirement for testing these valves.

The surveillance testing for measuring leakage rates is consistent with the requirements of Appendix J to 10 CFR 50 with the exception of exemptions granted for testing the airlocks after each opening, and uncoupling the third Type A test of each 10-year service period from the last outage of that period.

3/4.6.1.3 CONTAINMENT AIR LOCKS

The limitations on closure and leak rate for the containment air locks are required to meet the restrictions on PRIMARY CONTAINMENT INTEGRITY and the containment leakage rate given in Specifications 3.6.1.1 and 3.6.1.2. The specification makes allowances for the fact that there may be long periods of time when the air locks will be in a closed and secured position during reactor operation. Only one closed door in each air lock is required to maintain the integrity of the containment. Verification that each air lock door inflatable seal system is OPERABLE by the performance of a local leak-detection test for a period of less than 48 hours is permissible if it can be demonstrated that the leakage rate can be accurately determined for this shorter period. (This is in accordance with Sections 6.4 and 7.6 of ANSI N45.4-1972.)

3/4.6.1.4 MSIV LEAKAGE CONTROL SYSTEM

Calculated doses resulting from the maximum leakage allowance for the main steamline isolation valves in the postulated LOCA situations would be a small fraction of the 10 CFR 100 guidelines, provided the main steam line system from the isolation valves up to and including the turbine condenser remains intact. Operating experience has indicated that degradation has occasionally occurred in the leak tightness of the MSIV's such that the specified leakage requirements have not always been maintained continuously. The requirement for the leakage control system will reduce the untreated leakage from the MSIVs when isolation of the primary system and containment is required.

3/4.6.1.5 FEEDWATER LEAKAGE CONTROL SYSTEM

The feedwater leakage control system consists of two independent subsystems designed to eliminate through-line leakage in the feedwater piping by pressurizing the feedwater lines to a higher pressure than the containment and drywell pressure. This ensures that no release of radioactivity through the feedwater line isolation valves will occur following a loss of all offsite power coincident with the postulated design basis loss-of-coolant accident.

3/4.6.1.6 CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the unit. Structural integrity is required to ensure that the containment will withstand the maximum pressure of 11.5 psig in the event of a LOCA. A visual inspection in conjunction with Type A leakage tests is sufficient to demonstrate this capability.

3/4.6.1.7 CONTAINMENT INTERNAL PRESSURE

The limitations on containment-to-Auxiliary Building and Enclosure Building differential pressure ensure that the containment peak pressure of 11.5 psig does not exceed the design pressure of 15.0 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 3.0 psid. The limit of -0.1 to 1.0 psid for initial containment-to-Auxiliary Building and Enclosure Building differential pressure will limit the containment pressure to 11.5 psid which is less than the design pressure and is consistent with the safety analysis.

3/4.6.1.8 CONTAINMENT AVERAGE AIR TEMPERATURE

The limitation on containment average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 185°F during LOCA conditions and is consistent with the safety analysis.

3/4.6.1.9 CONTAINMENT PURGE SYSTEM

The continuous use of the containment purge lines during all operational conditions is restricted to the 6-inch purge supply and exhaust isolation valves; whereas, continuous containment purge using the 20-inch purge system is limited to only OPERATIONAL CONDITIONS 4 and 5. Intermittent use of the 20-inch purge system during OPERATIONAL CONDITIONS 1, 2 and 3 is allowed only to reduce airborne activity levels and shall not exceed 1000 hours of use per 365 days.

The design of the 6-inch purge supply and exhaust isolation valves meets the requirements of Branch Technical Position CSB 6-4, "Containment Purging During Normal Plant Operations."

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 89 TO FACILITY OPERATING LICENSE NO. NPF-29

ENTERGY OPERATIONS, INC., ET AL.

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

1.0 INTRODUCTION

By letter dated June 25, 1991, the licensee (Entergy Operations, Inc.), submitted a request for changes to the Grand Gulf Nuclear Station, Unit 1 (GGNS) Technical Specifications (TS). The requested changes would revise the TS to allow a one-time extension of the required test interval for overall integrated containment leak rate tests (Type A tests) as specified in TS 4.6.1.2.a. The licensee also requested deletion of the TS 4.6.1.2.a requirement coupling the third Type A tests to the plant shutdown for the 10-year Inservice Inspection (ISI) outage.

The licensee indicated that the preoperational integrated leak rate tests (ILRTs) at GGNS were completed on January 4, 1982; the first periodic ILRT was completed during a maintenance outage on November 4, 1985, and the second (most recent) ILRT on April 15 and 16, 1989, during Refueling Outage 3. In accordance with the current TS 4.6.1.2.a requirement, a third (the next periodic) ILRT must be performed 40 ± 10 months later (between October 1991 and June 1993). This TS also requires that the third periodic test in a 10-year service period be conducted during the shutdown for the 10-year ISI outage. As the GGNS entered commercial operation on July 1, 1985, the first 10-year ISI will be conducted during the Refueling Outage 7 (RF07), planned for April 1995. Because of this timing, it is not possible to simultaneously meet all of the test interval requirements of TS 4.6.1.2.a as currently written. The licensee proposed to perform the third ILRT during Refueling Outage 6 (RF06), planned for October 1993 (approximately 54 months from previous test). The proposed TS revision provides for a one-time extension of the 40 ± 10 month interval via a footnote to TS 4.6.1.2.a. The one-time extension of the ILRT test interval and the deletion of coupling requirements to the 10-year ISI outage are exemptions to Appendix J requirements.

2.0 EVALUATION

The licensee indicated that the past timing of the Type A tests has been the result of an unanticipated delay of approximately 42 months between the preoperational ILRT and completion of power ascension testing. The intent of the established test interval is to conduct three approximately equally spaced Type A tests within a given 10-year inservice period. The proposed extension remains consistent with the intent. The alternative of conducting the third periodic ILRT during RF05 in order to meet the 40±10-month requirement would necessitate conducting another test during RF07. The result would be four Type A tests during the first 10-year inservice, clearly contrary to the intent of Appendix J regulations. The licensee has estimated that performance of an additional test would add 2 days to the outage schedule with associated costs and 9 man-rem of exposure to test personnel. The licensee indicated that such additional costs are in excess of those contemplated when the regulation was adopted.

According to the licensee, no trend in previous test results at GGNS indicates that an extension of the maximum test interval by approximately 4 months would jeopardize the ability of the containment to maintain the leakage rate at or below the required Type A limits. The three previous test conducted at GGNS showed leakage rates of 42%, 57%, and 54%, respectively, of the allowable leakage rate of 9.75La. Moreover,industry data indicate that most ILRT failures are due to leakage through penetrations that are Type B or C local leak rate tested. These penetrations are tested at every refueling outage and provide sufficient verification of acceptable containment leakage rates between ILRTS.

The licensee also indicated that there have been no permanent modifications to the containment structure, liner, or penetrations, nor other temporary alterations that would adversely affect the Type A test results since the last successful ILRT. Presently, no such modifications to the containment boundary are planned prior to RF06 when the next ILRT will be conducted under the proposed TS revision. Any major modifications to the containment would be subject to the special testing requirements of Section IV.A of Appendix J. The proposed modification of the Type A test schedule is a one-time extension. Following RF06, the ILRT schedule will be appropriately planned to meet the required test interval in the future.

Based on the past ILRT test results and the absence of modifications to the containment and its penetrations, the staff finds that the proposed amendment for a one-time extension of the required test interval to allow performance of the third periodic ILRT during RF06 would not adversely affect plant safety and, therefore, is acceptable.

Regarding decoupling, the licensee indicated that no practical need exists to link the third Type A ILRT with the inspections performed during each 10-year ISI outage. The two programs evaluate different plant characteristics, and the methods of complying with each program are considerably different. The purpose of the containment leak rate test program, as described in the introduction to Appendix J to 10 CFR Part is to ensure that leakage through the primary containment and components penetrating the primary containment does not exceed allowable leakage rate limits. These limits help to ensure compliance with the guidelines of 10 CFR Part 100. The 10-year ISI or ASME Section XI inspection program is intended to separately ensure that the structural integrity of Class 1, 2, and 3 components is maintained in accordance with the requirements of the ASME code or 10 CFR 50.55a.

The proposed decoupling has no safety consequences because the requirements of containment integrity in Appendix J and the TS and the structural integrity of Class 1, 2, and 3 components in the ASME code are not being changed. The three Type A tests will continue to be performed at approximately equal intervals during each 10-service period. The staff finds that deletion of the requirements of TS 4.6.1.2.a linking the Type A test to the 10-year ISI outage would not adversely affect the plant safety.

Based on the above evaluation, the staff concludes that changing TS 4.6.1.2.a to allow a one-time extension of the interval between containment integrity leak rate tests for performance of the third periodic Type A test during the RF06 and to delete the requirement coupling the third Type A test to the plant shutdown for the 10-year inservice inspection outage will not adversely impact containment integrity and is, therefore, acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Mississippi State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The NRC 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 33954). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

Pursuant to 10 CFR 51.32, an environmental assessment of the exemption from certain requirements of 10 CFR Part 50, Appendix J, related to these actions was published in the Federal Register on February 19, 1992 (57 FR 6046). Accordingly, the Commission has determined that the issuance of this amendment will not result in any environmental impacts others than those evaluated in the Final Environmental Statement.

5.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Goel
M. Sykes

Date: February 20, 1992

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of

Entergy Operations, Inc. (Grand Gulf Nuclear station, Unit No. 1)	)))	Docket No. 50-416

EXEMPTION

I.

Entergy Operations, Inc. (the licensee), is the holder of Facility Operating License No. NPF-29 (the license), which authorizes operation of the Grand Gulf Nuclear Station. The license provides, among other things, that it is subject to all rules, regulations and Orders of the Nuclear Regulatory Commission (the Commission) now and hereafter in effect.

The facility consists of a boiling water reactor located at the licensee's site in Claiborne County, Mississippi.

II.

By letter dated June 25, 1991, the licensee applied for an amendment to Operating License No. NPF-29 to change certain provisions of the Technical Specifications (TS). In its letter, the licensee also requested an exemption from the Commission's regulations. The exemption is from a requirement in Appendix J to 10 CFR Part 50 that certain surveillance tests be conducted during the same refueling outage.

The specific requirement is contained in Section III.D.1(a) of Appendix J to 10 CFR Part 50, and states in part that "...a set of three Type A tests shall be performed, at approximately equal intervals, during each 10-year service period. The third test of each set shall be conducted when the plant is shut down for the 10-year plant inservice inspections." The Type A tests are defined in Section II.F of Appendix J as those "...tests intended to measure the primary reactor containment overall integrated leakage rate... at periodic intervals...." The 10-year inservice inspection is that series of inspections performed every 10 years in accordance with Section XI of the ASME Bolder and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. The time required to perform the integrated leak rate tests (ILRTs) necessitates that they be performed during refueling outages. The interval between ILRTs should be 40 months for three tests to be performed during each 10-year period. Since refueling outages do not necessarily coincide with a 40-month interval, a permissible variation of 10 months is typically authorized in the TS issued with an operating license to allow flexibility in scheduling the IRLTs.

The second of the set of three ILRTs for the Grand Gulf plant was successfully conducted in April 1989 during Refueling Outage 3 (RF03). The Grand Gulf TS require that the next ILRT be conducted between October 1991 and June 1993. It can thus be conducted during Refueling Outage 5, which will probably start in April 1992.

Because of the time it takes, the 10-year ISI required by 10 CFR 50.55a must also be conducted during a refueling outage. The next ISI will be performed during the Refueling Outage 7 (RF07) starting in June 1995. If the requested exemption is not granted, Section III.D.1(a) of Appendix J would require an additional ILRT in April 1992, about 36 months after the previous ILRT. This schedule would conform with the interval set forth in the TS, but the test would not fall during the 10-year ISI.

Additionally, this schedule would necessitate another test during RF07. In these circumstances, to require compliance with the 40±10-month test interval would not be consistent with either the intent or the underlying purpose of the rule, which calls for three Type A tests to be performed at approximately equal intervals during each 10-year service period.

In its exemption request dated June 25, 1991, the licensee cites from Appendix J that "the purpose of the tests is to assure that...leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications...." The licensee asserts, and the NRC staff agrees, that the Type A test conducted in April 1989 met the underlying purpose of the rule in demonstrating the required overall leak-tightness of the primary containment. Accordingly, another Type A test in the forthcoming refueling outage is not necessary to meet the intent of the rule. Another ILRT in the forthcoming refueling outage would not add significantly to the assurance that the overall leakage rate of the primary containment and its penetrations remain within the value specified in the Grand Gulf TS and certainly would go beyond the intent of the rule that requires these tests to be conducted at approximately equal intervals.

On this basis, we find that the licensee has demonstrated that the "Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule..." [10 CFR 50.12(a)(2)(ii)].

The Type A test and the 10-year ISI are independent of each other and provide assurances of different plant characteristics. The Type A tests assure the required leak-tightness to demonstrate compliance with the guidelines of 10 CFR Part 100. The 10-year ISI provides assurance of the structural integrity of the structures, systems, and components in compliance with 10 CFR 50.55a. Accordingly, there is no safety-related reason for coupling them in the same refueling outage.

On this basis, the NRC staff finds the licensee to have demonstrated, as required by 10 CFR 50.12(a)(2), that special circumstances are present. Furthermore, the staff finds that the uncoupling of the Type A test from the 10-year ISI will not present an undue risk to the public health and safety.

III.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, an exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest, and hereby grants an exemption with respect to one of the requirements of 10 CFR Part 50, Appendix J, Section III.D.1(1):

> Grand Gulf Nuclear Station Technical Specifications may be revised to require that the IRLTs be performed solely according to the 40 ± 10-month frequency, not in conjunction with the 10-year inservice inspection. This Exemption does not alter the existing requirement that three ILRTs be performed during each 10-year service period.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this Exemption will have no significant impact on the quality of the human environment (57 FR 6046).

This exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Martin J. Virgilio

Martin J. Virgilio, Acting Director
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland
this 20th day of February, 1992