

August 16, 1993

Mr. C. Randy Hutchinson
Vice President, Operations GGNS
Entergy Operations, Inc.
Post Office Box 756
Port Gibson, Mississippi 39150

Dear Mr. Cottle:

SUBJECT: ISSUANCE OF AMENDMENT NO. 108 TO FACILITY OPERATING LICENSE
NO. NPF-29 - GRAND GULF NUCLEAR STATION, UNIT 1 (TAC NO. M86487)

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 108 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 May 20, 1993, as supplemented by letter dated July 15, 1993.

The amendment removes from the TS the operability requirements for the auto-test feature of the load shedding and sequencing (LSS) system, and increases the allowed outage time in the TS for an inoperable LSS system from 8 to 12 hours.

A copy of our related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

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. 108 to NPF-29
- 2. Safety Evaluation

cc w/enclosures:
See next page

DISTRIBUTION

Docket File	NRC/Local PDR	PD4-1 Reading	P. Noonan
E. Adensam	OPA(2G5)	H. Rood	PD4-1 Plant File
P. O'Connor(2)	OGC (15B18)	D. Hagan (3206)	T. Gody, (13E21)
G. Hill(4)	C. Grimes (11E22)	D. Pickett (13H15)	ACRS(10)
OC/LFMB (4503)	D. Verrelli, RII	R. Hall (13E21)	J. Roe (13A2)

OFC	LA/PD4-1	PM/PD4-1	OGC	(A)D/PD4-1
NAME	PNoonan	PO'Connor/v	<i>Barb</i>	H.Rood <i>HR</i>
DATE	7/28/93	7/28/93	8/2/93	8/16/93
COPY	YES/NO	YES/NO	YES/NO	YES/NO

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 Paul W. O'Connor, Senior Project Manager
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OFC	LA/PD4-1 <i>PN</i>	PM/PD4-1 <i>fwol</i>	OGC <i>OB</i>	(A)D/PD4-1
NAME	PNoonan	PO'Connor/v		HRood <i>HR</i>
DATE	7/28/93	7/28/93	8/2/93	8/16/93
COPY	YES/NO	YES/NO	YES/NO	YES/NO



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 16, 1993

Docket No. 50-416

Mr. C. Randy Hutchinson
Vice President, Operations GGNS
Entergy Operations, Inc.
Post Office Box 756
Port Gibson, Mississippi 39150

Dear Mr. Hutchinson:

SUBJECT: ISSUANCE OF AMENDMENT NO. 108 TO FACILITY OPERATING LICENSE
NO. NPF-29 - GRAND GULF NUCLEAR STATION, UNIT 1 (TAC NO. M86487)

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A copy of our related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "Paul W. O'Connor".

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. 108 to NPF-29
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. C. Randy Hutchinson
Entergy Operations, Inc.

Grand Gulf Nuclear Station

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENERGY 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. 108
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 May 20, 1993, as supplemented by letter dated July 15, 1993, 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. 108, 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



Harry Rood, Acting 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: August 16, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 108

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

3/4 8-16

3/4 8-18

INSERT PAGES

3/4 8-16

3/4 8-18

ELECTRICAL POWER SYSTEMS

3/4.8.3 ONSITE POWER DISTRIBUTION SYSTEMS

DISTRIBUTION - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.3.1 The following power distribution system divisions shall be energized:

- a. A.C. power distribution:
 1. Division 1, consisting of:
 - a) 4160 volt A.C. bus 15AA.
 - b) 480 volt A.C. MCCs 15B11, 15B21, 15B31, 15B41, 15B51 and 15B61.
 - c) 120 volt A.C. distribution panels in 15P11, 15P21, 15P31, 15P41, 15P51 and 15P61.
 - d) LCCs 15BA1, 15BA2, 15BA3, 15BA4, 15BA5 and 15BA6.
 2. Division 2, consisting of:
 - a) 4160 volt A.C. bus 16AB.
 - b) 480 volt A.C. MCCs 16B11, 16B21, 16B31, 16B41, 16B51 and 16B61.
 - c) 120 volt A.C. distribution panels in 16P11, 16P21, 16P31, 16P41, 16P51 and 16P61.
 - d) LCCs 16BB1, 16BB2, 16BB3, 16BB4, 16BB5 and 16BB6.
 3. Division 3, consisting of:
 - a) 4160 volt A.C. bus 17AC.
 - b) 480 volt A.C. MCCs 17B01 and 17B11.
 - c) 120 volt A.C. distribution panels 17P11.
 4. Two separate and independent OPERABLE load shedding and sequencing panels for the control of Division 1 and 2, respectively.
- b. D.C. power distribution:
 1. Division 1, consisting of 125 volt D.C. distribution panel 1DA1 and 1DA2.
 2. Division 2, consisting of 125 volt D.C. distribution panel 1DB1 and 1DB2.
 3. Division 3, consisting of 125 volt D.C. distribution panel 1DC1.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ELECTRICAL POWER SYSTEMS

LIMITING CONDITIONS FOR OPERATION (Continued)

ACTION:

- a. For A.C. power distribution:
 1. With either Division 1 or Division 2 of the above required A.C. distribution system not energized, re-energize the division within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 2. With Division 3 of the above required A.C. distribution system not energized, declare the HPCS system inoperable and take the ACTION required by Specification 3.5.1.
 3. With one of the above required load shedding and sequencing panels inoperable, restore the inoperable panel to OPERABLE status within 12 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. For D.C. power distribution:
 1. With either Division 1 or Division 2 of the above required D.C. distribution system not energized, re-energize the division within 2 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 2. With Division 3 of the above required D.C. distribution system not energized, declare the HPCS system inoperable and take the ACTION required by Specification 3.5.1.

SURVEILLANCE REQUIREMENTS

4.8.3.1.1 Each of the above required power distribution system divisions shall be determined energized at least once per 7 days by verifying correct breaker alignment on the busses/LCs/MCCs/panels and voltage on the busses/LCs.

4.8.3.1.2 Each of the above required load shedding and sequencing panels shall be demonstrated OPERABLE at least once per 31 days by performance of a manual test and verifying response within the design criteria to the following test inputs:

- a) LOCA.
- b) Bus undervoltage.
- c) Bus undervoltage followed by LOCA.
- d) LOCA followed by bus undervoltage.

ELECTRICAL POWER SYSTEMS

DISTRIBUTION - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.3.2 As a minimum, the following power distribution system divisions shall be energized:

- a. For A.C. power distribution, Division 1 or Division 2, and when the HPCS system is required to be OPERABLE, Division 3, with:
 1. Division 1 consisting of:
 - a) 4160 volt A.C. bus 15AA.
 - b) 480 volt A.C. MCCs 15B11, 15B21, 15B31, 15B41, 15B51 and 15B61.
 - c) 120 volt A.C. distribution panels in 15P11, 15P21, 15P31, 15P41, 15P51 and 15P61.
 - d) LCCs 15BA1, 15BA2, 15BA3, 15BA4, 15BA5 and 15BA6.
 2. Division 2 consisting of:
 - a) 4160 volt A.C. bus 16AB.
 - b) 480 volt A.C. MCCs 16B11, 16B21, 16B31, 16B41, 16B51 and 16B61.
 - c) 120 volt A.C. distribution panels in 16P11, 16P21, 16P31, 16P41, 16P51 and 16P61.
 - d) LCCs 16BB1, 16BB2, 16BB3, 16BB4, 16BB5 and 16BB6.
 3. Division 3 consisting of:
 - a) 4160 volt A.C. bus 17AC.
 - b) 480 volt A.C. MCCs 17B01 and 17B11.
 - c) 120 volt A.C. distribution panels 17P11.
 4. The OPERABLE load shedding and sequencing panel associated with the division(s) required to be energized.
- b. For D.C. power distribution, Division 1 or Division 2, and when the HPCS system is required to be OPERABLE, Division 3, with:
 1. Division 1 consisting of 125 volt D.C. distribution panel 1DA1 and 1DA2.
 2. Division 2 consisting of 125 volt D.C. distribution panel 1DB1 and 1DB2.
 3. Division 3 consisting of 125 volt D.C. distribution panel 1DC1.

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5 and *.

*
When handling irradiated fuel in the primary or secondary containment.

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION:

- a. For A.C. power distribution:
 1. With both Division 1 and Division 2 of the above required A.C. distribution system not energized and/or with the load shedding and sequencing panel associated with the division(s) required to be energized inoperable, suspend CORE ALTERATIONS, handling of irradiated fuel in the primary or secondary containment and operations with a potential for draining the reactor vessel. OPERATIONAL CONDITION changes per Specification 3.0.4 are not permitted.
 2. With Division 3 of the above required A.C. distribution system not energized, declare the HPCS system inoperable and take the ACTION required by Specification 3.5.2 and 3.5.3.
- b. For D.C. power distribution:
 1. With both Division 1 and Division 2 of the above required D.C. distribution system not energized, suspend CORE ALTERATIONS, handling of irradiated fuel in the primary or secondary containment and operations with a potential for draining the reactor vessel. OPERATIONAL CONDITION changes per Specification 3.0.4 are not permitted.
 2. With Division 3 of the above required D.C. distribution system not energized, declare the HPCS system inoperable and take the ACTION required by Specification 3.5.2 and 3.5.3.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.8.3.2.1 At least the above required power distribution system divisions shall be determined energized at least once per 7 days by verifying correct breaker alignment on the busses/LCs/MCCs/panels and voltage on the busses/LCs.

4.8.3.2.2 The above required load shedding and sequencing panel(s) shall be demonstrated OPERABLE at least once per 31 days by performance of a manual test and verifying response within the design criteria to the following test inputs:

- a) LOCA.
- b) Bus undervoltage.
- c) Bus undervoltage followed by LOCA.
- d) LOCA followed by bus undervoltage.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 108 TO FACILITY OPERATING LICENSE NO. NPF-29
ENERGY OPERATIONS, INC., ET AL.
GRAND GULF NUCLEAR STATION, UNIT 1
DOCKET NO. 50-416

1.0 INTRODUCTION

By letter dated May 20, 1993, as supplemented by letter dated July 15, 1993, Entergy Operations, Inc. (the licensee), submitted a request for changes to the Grand Gulf Nuclear Station, Unit 1 (GGNS) Technical Specifications (TS). The proposed change would remove from the TS the operability requirements for the auto-test feature of the load shedding and sequencing (LSS) system, and would increase the allowed outage time (AOT) in the TS for an inoperable LSS system from 8 to 12 hours. As discussed below, the NRC staff has reviewed the proposed changes and finds them acceptable.

The July 15, 1993 letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

In August 1991, problems with the auto-test feature of the GGNS Division II LSS system resulted in discretionary enforcement action by the NRC staff. Specifically, a temporary waiver of compliance was granted allowing continued operation with the auto-test function inoperable from August 15, 1991 through August 31, 1991. The waiver was granted primarily on the basis that auto-test feature is not essential for the LSS system to perform its safety function.

By letter dated May 20, 1993, the licensee requested approval of a TS change to Surveillance Requirements 4.8.3.1.2 and 4.8.3.2.2 to remove operability requirements for the auto-test feature of the LSS system. In its May 20, 1993 letter the licensee also requested approval of TS change to ACTION statement a.3 of Technical Specification 3.8.3.1 to increase the AOT for an inoperable LSS system from 8 to 24 hours. After discussions with the NRC staff, the licensee, by letter dated July 15, 1993, modified its previous request and proposed changing the AOT for an inoperable LSS system from 8 to 12 hours.

3.0 EVALUATION

The LSS system is utilized during a Loss-of-Coolant-Accident (LOCA) and/or bus undervoltage (BUS) condition to disconnect (shed) and connect, automatically

in sequence, loads on the Class 1E buses. The LSS system at GGNS consists of two solid state LSS panels, one for each division. These panels contain separate sequencers with both manual and automatic test capability. All system logic and timing functions utilize solid state circuits, with buffering relays used for input and output. Section 8.3-8 of the GGNS updated final safety analysis report (UFSAR) states that the timing sequence for the loss of coolant accident (LOCA) loads is the same whether the safety buses are energized from offsite or onsite (emergency diesel generator) power.

TS Surveillance Requirements 4.8.3.1.2.a (operating) and 4.8.3.2.2.a (shutdown) require that the LSS panels be demonstrated operable at least once per 12 hours by determining that the auto-test system is operating and is not indicating a faulted condition. If the auto-test feature indicates a faulted condition, the current TS requires that the plant be shut down even though the LSS system may be capable of performing its specified safety function. The licensee states that based on the LSS system design and their experience with the system, many of the faults identified on the LSS panel do not represent a failure of the functional capabilities of the LSS system, but rather malfunctions of the auto-test feature itself.

The auto-test system is a non-safety-related feature of the LSS system that monitors the LSS circuit operation once every 1.5 seconds and is utilized as a diagnostic tool in identifying LSS system malfunctions. If a fault is detected, the logic displays the step number of the failed test on the LSS control panel, interrupts the auto-test, thereby blocking it from further operation, and actuates a control room annunciator alerting the control room operator that the auto-test has detected an apparent fault in the logic. The LSS system control panel is used in conjunction with manual tests to identify the source of the fault. The auto-test is also terminated upon receipt of a valid LSS actuation signal. The licensee states that they will not disconnect the auto-test feature but rather continue to utilize it to monitor the LSS system's ability to perform its intended safety function. Prior experience has shown that failure of the auto-test does not affect the ability of the LSS system to perform its safety function.

The licensee performs Surveillance Requirement 4.8.1.1.2.d.4.a.2 at least once per 18 months, during shutdown, by simulating a loss of offsite power and verifying the diesel generator starts on auto-start signal, energizes the emergency buses with permanently connected loads within 10 seconds, energizes the auto-connected shutdown loads through the load sequencer and operates for greater than or equal to 5 minutes. This is consistent with the improved GE BWR-6 Standard Technical Specifications, NUREG-1434, Revision 0 (STS).

Moreover, the licensee is retaining the Surveillance Requirements 4.8.3.1.2 and 4.8.3.2.2 which require performing a manual LSS logic test at least once per 31 days by simulating real panel inputs utilizing test switches on the

control panel, and verifying response within the design criteria to the following test inputs:

- a) LOCA
- b) Bus undervoltage
- c) Bus undervoltage followed by LOCA
- d) LOCA followed by bus undervoltage

This exceeds the requirements given in the STS. Based on the above, the change to remove the auto-test feature from the TS is, therefore, acceptable.

In its May 20, 1993 submittal, the licensee proposed a change to ACTION statement a.3 of Technical Specification 3.8.3.1 to increase the allowed outage time (AOT) for an inoperable LSS panel from 8 hours to 24 hours. The licensee states that since the LSS panel comprises an intricate electronic system, the proposed 24 hour AOT would allow the LSS panel vendor to be contacted and utilized in troubleshooting LSS system problems. The NRC staff review of the licensee's submittal indicated that this change was not consistent with the STS, which requires the restoration of an inoperable automatic load sequencer to operable status within 12 hours. The 12 hour restoration time for the load sequencer is also consistent with ACTION statement c. of TS 3.8.1.1. This ACTION statement requires that with one offsite circuit and diesel generator 11 or 12 inoperable, at least one of the inoperable ac sources must be restored to operable status within 12 hours. When one of the inoperable ac power sources specified in ACTION statement c. of TS 3.8.1.1 is restored within 12 hours, the sequencer will be required to automatically sequence the safety loads to the safety bus. Therefore, licensee was advised that its request to increase the AOT for an inoperable LSS system from 8 to 24 hours was unacceptable. As a result, the licensee submitted a letter dated July 15, 1993, in which it revised its proposed TS change to increase the AOT for an inoperable LSS system from 8 to 12 hours. Based on the discussion given above, the NRC staff finds the 12 hour AOT to be acceptable.

In summary, on the basis of the above evaluation, the NRC staff has concluded that the licensee has provided adequate justification to remove operability requirements for the auto-test feature of the load shedding and sequencing system from TS Surveillance Requirement 4.8.3.1.2 and 4.8.3.2.2. Operating experience demonstrates that the failure of the auto-test will not affect the ability of the LSS system to perform its safety function. The 31 day manual LSS logic test which is retained in Surveillance Requirement 4.8.3.1.2 and 4.8.3.2.2 in conjunction with 18-month surveillance performed per TS 4.8.1.1.2.d.4.a.2 provide a comprehensive test of the LSS system logic. Therefore, removing the LCO for the auto-test feature is acceptable. The proposed change to increase the allowed outage time for an inoperable load shedding and sequencing system from 8 to 12 hours in ACTION statement a.3 of TS 3.8.3.1 is consistent with the STS and is, therefore, acceptable.

4.0 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.

5.0 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 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 (58 FR 34076). Accordingly, the 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 the amendment.

6.0 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: N. Trehan

Date: August 16, 1993