August 13, 1996

Mr. C. Randy Hutchin Vice President, Operations GGNS Entergy Operations, Inc. P. O. Box 756 Port Gibson, MS 39150

CORRECTION TO THE SAFETY EVALUATION FOR AMENDMENT NO. 124 TO SUBJECT: FACILITY OPERATING LICENSE NO. NPF-29 - GRAND GULF NUCLEAR STATION. UNIT 1 (TAC NO. M95225)

Dear Mr. Hutchinson:

By letter July 15, 1996, we issued Amendment No. 124 to the Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1 (GGNS). The amendment revised Surveillance Requirement 3.8.1.14 of the Technical Specifications to allow the 24-hour test of the emergency diesel generators to also be conducted during power operation.

In the Safety Evaluation that supported the amendment and was an enclosure to the letter, we overlooked two errors on page 6 of the evaluation when we issued the amendment. The errors in the second paragraph from the bottom were the following: (1) the licensee had in fact stated that it had <u>not</u> done an exhaustive review of relay actuation for an almost unlimited number of possible sequence of events and/or scenarios, and (2) the word licensee was misspelled by the word license.

A new corrected page 6, containing marginal lines indicating the area of change, is enclosed. The old page 6 of the Safety Evaluation should be removed and replaced by the new page 6.

> Stneerely. Jack N. Donohew, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosure: Corrected page 6 of the Safety Evaluation for Amendment No. 124

cc w/encl: See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 13, 1996

Mr. C. Randy Hutchinson Vice President, Operations GGNS Entergy Operations, Inc. P. O. Box 756 Port Gibson, MS 39150

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Sincerely,

Jack N. Donohew, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosure: Corrected page 6 of the Safety Evaluation for Amendment No. 124

cc w/encl: See next page

Mr. C. Randy Hutchinson Entergy Operations, Inc.

## cc:

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discussed in Section 3.1 above for the LOCA signal. This design was reviewed and approved by the Staff as documented in Section 8.3.1 of the Safety Evaluation Report, NUREG-0831, dated September 1981, for GGNS.

The licensee stated that, in accordance with the GGNS system design, it is possible that an EDG started as a result of a LOOP signal could trip due to some engine or generator protective trip because, as previously noted, protective EDG trips are not bypassed by a LOOP signal. It is also possible that this trip could result in the actuation of a generator lockout. In this instance, local operator action would be required (i.e., resetting lockout) prior to the EDG restarting and/or resequencing onto the bus following a subsequent signal (either emergency or non-emergency). For emergency starts, local operator action would only be required if a generator lockout protective trip had previously actuated.

The staff has also been concerned that a possible fault on the offsite system could cause a lockout of the ESF bus or could trip the EDG itself, which would delay the EDG's response to an emergency condition. The licensee stated that while one could postulate a grid or bus fault that could actuate an EDG protective trip or lockout, any delay in the EDG response time should be considered acceptable because of the:

- less critical nature of EDG start/load times for LOOP,
- low probability of subsequent events occurring following the initial LOOP, and
- procedural requirements that would tend to minimize EDG response times

as discussed in the licensee's application. The procedure for testing EDGs has an operator in the room where the local EDG panel is during the test and this would minimize the operator response time to EDG trip or lockout.

The licensee stated that it has not done an exhaustive review of relay actuation for an almost unlimited number of possible sequence of events and/or scenarios. The approach taken by the licensee was to confirm the possibility that an EDG lockout could occur, assume that the lockout actuated, and then determine whether this resulted in an unacceptable condition. The licensee also did not attempt to quantify the frequency of the actuation of the lockout relay; however, the licensee stated, based on its experience of operating the EDGs in a similar configuration when performing SR 3.8.1.3 on at least a monthly basis, that the likelihood of such an event is low.

The licensee also stated that a LOOP, unlike a LOCA, does not present an immediate challenge to fuel cladding integrity, reactor water level control, or to the containment, as demonstrated by the bounding 4-hour Station Blackout coping analysis contained in UFSAR Appendix 8-A. The licensee further stated that, if there has only been the loss of offsite power or an individual bus fault, an LOCA has also not occurred, it is not necessary that the EDG respond in the same manner as for the LOCA; therefore, there would be sufficient time for the operator to recover an EDG from a lockout or trip if plant conditions warranted such action.

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