

February 9, 1995

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

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT  
RELATED TO CONVERSION TO THE IMPROVED STANDARD TECHNICAL  
SPECIFICATIONS - GRAND GULF NUCLEAR STATION, UNIT NO. 1  
(TAC NO. M88101)

Dear Mr. Hutchinson:

Enclosed is a copy of the Environmental Assessment and Finding of No  
Significant Impact related to your application for amendment dated October 15,  
1993, as supplemented by letters dated April 15, and November 10, 1994. The  
proposed amendment to the Grand Gulf Nuclear Station Technical Specifications  
would implement the Improved Standard Technical Specifications for BWR/6  
facilities (NUREG-1434).

The assessment is being forwarded to the Office of the Federal Register for  
publication.

Sincerely,

ORIGINAL SIGNED BY: J. Hall for  
Paul W. O'Connor, Senior Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosure: Environmental Assessment

cc w/encl: See next page

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

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Sincerely,

A handwritten signature in cursive script that reads "James R. Hall for".

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

Docket No. 50-416

Enclosure: Environmental Assessment

cc w/encl: See next page

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Grand Gulf Nuclear Station

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UNITED STATES NUCLEAR REGULATORY COMMISSION  
ENERGY OPERATIONS, INC.  
DOCKET NO. 50-416  
ENVIRONMENTAL ASSESSMENT AND FINDING OF  
NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-29, issued to Entergy Operations, Inc. (the licensee), for operation of the Grand Gulf Nuclear Station, Unit 1 (GGNS), located in Claiborne County, Mississippi.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action

The proposed amendment will replace the existing Technical Specifications (TSs) in their entirety with the Improved Technical Specifications (ITSs).

The proposed action is in accordance with the licensee's amendment request dated October 15, 1993, as supplemented by letters dated April 15, and November 10, 1994.

The Need for the Proposed Action

It has been recognized that nuclear safety in all plants would benefit from improvement and standardization of the TSs. The "NRC Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (FEDERAL REGISTER 52 FR 3788, February 6, 1987) and later the Final Policy Statement, formalized this need. To facilitate the development of individual ITSs, each reactor vendor owners group (OG) and the NRC staff developed Standard TSs. For General Electric (GE) plants,

the Standard TSs (STS) are NUREG-1433 for BWR/4 reactor facilities and NUREG-1434 for BWR/6 facilities. NUREG-1434 formed the basis of the GGNS ITSS.

#### Description of the Proposed Change

The proposed revision to the TSs is based on NUREG-1434 and on guidance provided in the Policy Statement. Its objective is to completely rewrite, reformat, and streamline the existing TSs. Emphasis is placed on human factors principles to improve clarity and understanding. The Bases section has been significantly expanded to clarify and better explain the purpose and foundation of each specification. In addition to NUREG-1434, portions of the existing TSs were also used as the basis for the ITSS. Plant-specific issues (unique design features, requirements, and operating practices) were discussed at length with the licensee, and generic matters with the GE and other OGs.

The proposed changes from the existing TSs can be grouped into four general categories, as follows:

1. Non-technical (administrative) changes, which were intended to make the ITSS easier to use for plant operations personnel. They are purely editorial in nature or involve the movement or reformat of requirements without affecting technical content. Every section of the GGNS TSs has undergone these types of changes. In order to ensure consistency, the NRC staff and the licensee have used NUREG-1434 as guidance to reformat and make other administrative changes.
2. Relocation of requirements, which includes items that were in the existing GGNS TSs but did not meet the criteria set forth in the Policy Statement for inclusion in the TSs. In general, the proposed relocation of

items in the GGNS TSs to the Updated Final Safety Analysis Report (UFSAR), appropriate plant-specific programs, procedures and ITS Bases follows the guidance of the BWR/6 STS, NUREG-1434. Once these items have been relocated by removing them from the TSs to other licensee-controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC staff-approved control mechanisms which provide appropriate procedural means to control changes.

3. More restrictive requirements, which consist of proposed GGNS ITS items that are either more conservative than corresponding requirements in the existing GGNS TSs, or are additional restrictions which are not in the existing GGNS TSs but are contained in NUREG-1434. Examples of more restrictive requirements include: placing a Limiting Condition of Operation (LCO) on plant equipment, which is not required by the present TSs to be operable; more restrictive requirements to restore inoperable equipment; and more restrictive surveillance requirements.

4. Less restrictive requirements, which are relaxations of corresponding requirements in the existing GGNS TSs which provided little or no safety benefit and placed unnecessary burden on the licensee. These relaxations were the result of generic NRC action or other analyses. They have been justified on a case-by-case basis for GGNS as described in the safety evaluation to be issued with the license amendment, which will be noticed in the FEDERAL REGISTER.

#### Environmental Impacts of the Proposed Action

The Commission has completed its evaluation of the proposed revision to the TSs. Changes which are administrative in nature have been found to have no effect on technical content of the TSs, and are acceptable. The

increased clarity and understanding these changes bring to the TSs are expected to improve the operator's control of the plant in normal and accident conditions.

Relocation of requirements to other licensee-controlled documents does not change the requirements themselves. Future changes to these requirements may be made by the licensee under 10 CFR 50.59 or other NRC-approved control mechanisms, which assures continued maintenance of adequate requirements. All such relocations have been found to be in conformance with the guidelines of NUREG-1434 and the Policy Statement, and, therefore, to be acceptable.

Changes involving more restrictive requirements have been found to be acceptable.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit or to place unnecessary burden on the licensee, their removal from the TSs was justified. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of a generic NRC action, or of agreements reached during discussions with the OG and found to be acceptable for GGNS. Generic relaxations contained in NUREG-1434 have also been reviewed by the NRC staff and have been found to be acceptable.

In summary, the proposed revision to the TSs was found to provide control of plant operations such that reasonable assurance will be provided that the health and safety of the public will be adequately protected.

These TS changes will not increase the probability or consequences of accidents, no changes are being made in the types of any effluent that may

be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed TS amendment.

With regard to potential non-radiological impacts, the proposed amendment involves features located entirely within the restricted areas as defined in 10 CFR Part 20. It does not affect nonradiological plant effluents and has no other environmental impact. Accordingly, the Commission concludes that there are no significant nonradiological impacts associated with the proposed amendment.

#### Alternatives to the Proposed Action

Since the Commission has concluded there is no measurable environmental impact associated with the proposed amendment, any alternatives with equal or greater environmental impact need not be evaluated. As an alternative to the proposed amendment, the staff considered denial of the amendment. Denial of the amendment would result in no change in current environmental impacts. The environmental impacts of the proposed amendment and the alternative action are similar.

#### Alternative Use of Resources

This action does not involve the use of resources not previously considered in the Final Environmental Statement for the Grand Gulf Nuclear Station, Unit 1.

#### Agencies and Persons Consulted

In accordance with its stated policy, the staff consulted with the Mississippi State official regarding the environmental impact of the proposed action. The State official had no comments.

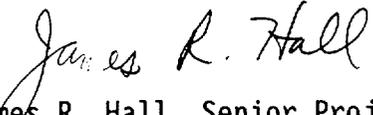
FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed amendment.

For further details with respect to this proposed action, see the licensee's letter dated October 15, 1993, as supplemented by letters dated April 15, and November 10, 1994, which are available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the Judge George W. Armstrong Library, 220 S. Commerce Street, Natchez, Mississippi 39120.

Dated at Rockville, Maryland this 9th day of February 1995.

FOR THE NUCLEAR REGULATORY COMMISSION

  
James R. Hall, Senior Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation