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RBG-45992

August 21, 2002

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: River Bend Station, Unit 1
Docket No. 50-458
License Amendment Request
Application for Technical Specification Change Regarding Missed
Surveillances Using the Consolidated Line Item Improvement
Process (CLIIP) (LAR 2002-22)

REFERENCE: Federal Register Volume 66, Number 189, pages 49714-49717
dated September 28, 2001

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations Inc., (Entergy) hereby requests the following Technical Specification amendment for River Bend Station (RBS). The proposed amendment would modify TS requirements for missed surveillances in Surveillance Requirement (SR) 3.0.3.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides a summary of the regulatory commitments made in this application. The marked-up Technical Specification Bases pages are provided for information in Attachment 5.

In accordance with 10 CFR 50.91 a copy of this application, with attachments, is being provided to the state of Louisiana designated official.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using the criteria in 10 CFR 50.92(c) and it has been determined that these changes involve no significant hazards considerations. The bases for these determinations are included in the attached submittal.

Awl

This application is made under the provisions of the Consolidated Line Item Improvement Process (CLIIP) as stipulated in the referenced Federal Register Notice dated September 28, 2001. The proposed change meets the requirements and content of the model application published in the Federal Register.

RBS is respectfully requesting review and approval of this request by July 31, 2003. Once approved, the amendment will be implemented within 60 days.

If you have any questions or require additional information, please contact Mr. Greg Norris at (225) 336-6391.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 21, 2002.

Yours truly,



PDH/GPN

attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. Proposed Technical Specification Pages
4. List of Regulatory Commitments
5. Changes to Technical Specification Bases Pages (proposed mark-up)

cc: U. S. Nuclear Regulatory Commission
Region IV
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NRC Senior Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

U.S. Nuclear Regulatory Commission
Attn: Mr. Michael K. Webb MS O-7D1
Washington, DC 20555-0001

Mr. Prosanta Chowdhury
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Louisiana Department of Environmental Quality
Office of Radiological Emergency Plan and Response
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Attachment 1

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Analysis of Proposed Technical Specification Change

1.0 DESCRIPTION

This letter is a request to amend Operating License NPF-47 for River Bend Station, Unit 1 (RBS).

The proposed amendment would modify Technical Specifications (TS) requirements for missed surveillances in SR 3.0.3. The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-358 Revision 5, as modified by Federal Register Notice 66FR32400, of June 14, 2001. The proposed amendment is also consistent with TSTF-358 Rev. 6 as discussed in resolution of comment 12 in Federal Register Notice 66FR49714, of September 28, 2001. The availability of this TS improvement was published in the Federal Register on September 28, 2001 as part of the Consolidated Line Item Improvement Process (CLIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy Operations Inc, (Entergy) has reviewed the safety evaluation dated June 14, 2001 as part of the CLIP. This review included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-358. Entergy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to River Bend Station and justify this amendment for the incorporation of the changes to the RBS TS.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the TS changes described in the final fully modified TSTF-358 Revision 5 or the NRC staff's model safety evaluation dated June 14, 2001. Note that the Entergy proposed changes are consistent with Revision 6 of TSTF-358 as discussed in the resolution of comment 12 in the referenced Federal Register notice.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Entergy has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIP. Entergy has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to RBS and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

Entergy will establish TS Bases for SR 3.0.3 which state that use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances. The

proposed Bases are consistent with those proposed by revision 6 to TSTF-358 and will be maintained by the Technical Specification Bases Control Program contained in Section 5.5 of the TS. The proposed Bases include the following elements: 1) details on how to implement the new requirements; 2) guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulation; 3) an explanation that RBS is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance; 4) that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition as discussed in Regulatory Guide 1.182; 5) the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively; 6) that the results of the risk evaluation determine the safest course of action; and 7) that all missed surveillances will be placed in the RBS Corrective Action Program.

4.0 ENVIRONMENTAL EVALUATION

Entergy has reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001 as part of the CLIIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to RBS and the evaluation is hereby incorporated by reference for this application.

Attachment 2

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Proposed Technical Specification Changes (mark-up)

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)

A risk evaluation shall be performed for any surveillance delayed greater than 24 hours and the risk impact shall be managed.

Attachment 3

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Proposed Technical Specification Pages

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)

Attachment 4

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List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy will establish the Technical Specification Bases for SR 3.0.3 as adopted with the issued license amendment.	X		60 days from TS Amendment Receipt

Attachment 5

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**Changes to Technical Specification Bases Pages
(proposed mark-up)**

BASES

SR 3.0.2
(continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. Therefore, when a test interval is specified in the regulations, the test interval cannot be extended by the TS, and the SR include a Note in the Frequency stating, "SR 3.0.2 is not applicable." An example of an exception when the test interval is not specified in the regulations is the Note in the Primary Containment Leakage Rate Testing Program, "SR 3.0.2 is not applicable." This exception is provided because the program already includes extension of test intervals."

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~, applies from the point in time that it is discovered that the Surveillance has not been

(continued)

greater

BASES

SR 3.0.3
(continued)

performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met. This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

INSERT
1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

INSERT
2

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable then is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

(continued)

INSERT 1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50 Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

INSERT 2

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182 "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.