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GNRO-2002/00084

September 16, 2002

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

SUBJECT: Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
Supplement to Amendment Request,
Appendix K Measurement Uncertainty Recovery - Power Uprate
Request (TAC MB3972, GGNS LDC 2002-072)

REFERENCE: NRC Letter, R. A. Gramm to W. A. Eaton, dated August 28, 2002, Draft
Safety Evaluation for Proposed 1.7 Percent Increase in Licensed Power
Level

Dear Sir or Madam:

By letter (Reference 1), the NRC transmitted a draft version of the Safety Evaluation for the Grand Gulf GGNS Appendix K Power Uprate. The transmittal was for the purpose of a review for the inclusion of proprietary information in the document. Entergy Operations, Inc. (Entergy) forwarded the document to General Electric Nuclear Energy (GE), the owner of the proprietary information submitted for this application. The NRC has asked that general technical and editorial comments not be identified at this time. Comments regarding the proprietary information are provided below

1. Section 3.2.7, third paragraph regarding NEDC-31984P – GE requests the second line of this paragraph should be considered proprietary as it describes aspects of the GE processes. They also note that the statement is inaccurate. GGNS notes that this info was not presented on our docket for this application and suggests the paragraph may not be needed to support approval of our application. The following alternative non-proprietary statement is suggested: The LOFW analysis described in the 5% uprate topical report NEDC-31984P (reference 8.21) is applicable to GGNS.
2. Section 3.9.3.1, fourth paragraph beginning "Reference 8.5" – GE requests the first four sentences of this paragraph be identified proprietary as they describe aspects of the GE processes or GE conclusions. EOI also notes that the second and third sentences are derived from the generic GE TLTR and may not be needed to support the GGNS application. The following alternative non-proprietary statement is suggested: Reference 8.5 and Appendix L present a generic evaluation of an ATWS event for a TPO uprate. This evaluation is applicable to GGNS. However, this evaluation is based on the ATWS response of GE fuel and GGNS is transitioning from GE to Framatome fuel.

A001

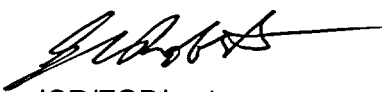
3. Section 3.9.3.1, sixth paragraph beginning "Additionally," - GE requests the first sentence of this paragraph be identified proprietary as it identifies aspects of the GE process and specific criteria. The following alternative non-proprietary statement is suggested: The discussion of the suppression pool temperature response to an ATWS event in Reference 8.5 is applicable to GGNS.
4. Section 3.9.3.1, seventh paragraph beginning "Based on" - GE requests the first line be identified as proprietary as it identifies aspects of the GE process. The following alternative non-proprietary statement is suggested: Based on the justification provided in the TLTR and the analyses performed
5. Section 3.9.3.2, first paragraph - GE requests the seventh sentence (ending with "... relatively small.") be identified as proprietary as it identifies aspects of the GE process. The following alternative non-proprietary statement is suggested: TLTR Table L-3 provides a basis that the effect of the uprate on SBO is relatively small.
6. Section 3.9.3.2, first paragraph - GE requests the ninth and tenth sentences (beginning "These margins") be identified as proprietary as they identify aspects of the GE process. The following alternative non-proprietary sentence is suggested to replace both of these sentences: As described in the TLTR, a plant-specific SBO analysis was not required for GGNS.

Entergy appreciates the opportunity to review the draft SE in advance to avoid potential issues with disclosure of proprietary information. The NRC has noted their willingness to issue a proprietary SE, if necessary. The suggestions above are offered to obviate the need for that approach.

A revision to the proprietary Thermal Power Optimization Safety Analysis Report (TSAR) will be submitted separately to address the NRC concerns with the 10CFR2.790 affirmation of the original TSAR. The above comments have been assembled to reflect the proprietary information consistent with the TSAR as it will be revised.

There are no technical changes to the original submittal proposed. The original no significant hazards considerations included in Reference 1 is not affected by any information contained in this supplemental letter. This letter contains no new commitments. If you have any questions or require additional information, please contact Jerry Burford at (601) 368-5755.

Sincerely,



JCR/FGB/amt

cc: (See Next Page)

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