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October 25, 2002

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Technical Specification Bases Update to the NRC for Period Dated
October 25, 2002

Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

GNRO-2002/00091

Ladies and Gentlemen:

Pursuant to Grand Gulf Nuclear Station (GGNS) Technical Specification 5.5.11, Entergy Operations, Inc. hereby submits an update of all changes made to GGNS Technical Specification Bases since the last submittal (GNRO-2002/00086 letter dated October 1, 2002 to the NRC from GGNS). This update is consistent with update frequency listed in 10CFR50.71(e).

This letter does not contain any commitments.

Should you have any questions, please contact Mike Larson at (601) 437-6685.

Yours truly,

A handwritten signature in black ink, appearing to read "CAB/MJL".

CAB/MJL

attachment:

GGNS Technical Specification Bases Revised Pages

cc:

(See Next Page)

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cc:

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

U.S. Nuclear Regulatory Commission ATTN: Mr. E. W. Merschoff (w/2) 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-4005	ALL LETTERS
U.S. Nuclear Regulatory Commission ATTN: Mr. David H. Jaffe, NRR/DLPM (w/2) ATTN: ADDRESSEE ONLY ATTN: Courier Delivery Only Mail Stop OWFN/7D-1 11555 Rockville Pike Rockville, MD 20852-2378	ALL LETTERS – COURIER DELIVERY (FEDEX, ETC.) ADDRESS ONLY - **** DO NOT USE FOR U.S. POSTAL SERVICE ADDRESS*****

ATTACHMENT to GNRO-2002/00091

GGNS Gulf Technical Specification Bases Revised Pages

dated

October 25, 2002

LDC#	BASES PAGES AFFECTED	TOPIC of CHANGE
02072	B 3.3-16, 70 & B 3.7-22	Implementation of Technical Specification Amendment 156 – Power uprate

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY

9. Turbine Stop Valve Closure, Trip Oil Pressure – Low
(continued)

operation with feedwater temperature $\geq 420^{\circ}\text{F}$, an allowable setpoint based on turbine first stage pressure is provided for the bypass function. The allowable setpoint is reduced for RTP operation with feedwater temperature $> 370^{\circ}\text{F}$ and $< 420^{\circ}\text{F}$.

The Turbine Stop Valve Closure, Trip Oil Pressure—Low Allowable Value is selected to be high enough to detect imminent TSV closure thereby reducing the severity of the subsequent pressure transient.

Eight channels of Turbine Stop Valve Closure, Trip Oil Pressure—Low Function, with four channels in each trip system, are required to be OPERABLE to ensure that no single instrument failure will preclude a scram from this Function if any three TSVs should close. This Function is required, consistent with analysis assumptions, whenever THERMAL POWER is $\geq 40\%$ RTP. This Function is not required when THERMAL POWER is $< 40\%$ RTP since the Reactor Vessel Steam Dome Pressure—High and the Average Power Range Monitor Fixed Neutron Flux—High Functions are adequate to maintain the necessary safety margins.

10. Turbine Control Valve Fast Closure, Trip Oil
Pressure – Low

Fast closure of the TCVs results in the loss of a heat sink that produces reactor pressure, neutron flux, and heat flux transients that must be limited. Therefore, a reactor scram is initiated on TCV fast closure in anticipation of the transients that would result from the closure of these valves. The Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Function is the primary scram signal for the generator load rejection event analyzed in Reference 4. For this event, the reactor scram reduces the amount of energy required to be absorbed and, along with the actions of the EOC-RPT System, ensures that the MCPR SL is not exceeded.

Turbine Control Valve Fast Closure, Trip Oil Pressure—Low signals are initiated by the EHC fluid pressure at each control valve. There is one pressure transmitter associated

(continued)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY

Turbine Stop Valve Closure, Trip Oil Pressure – Low
(continued)

first stage pressure; therefore to consider this Function OPERABLE, the turbine bypass valves must remain shut at $\geq 40\%$ RTP. Four channels of TSV Closure, with two channels in each trip system, are available and required to be OPERABLE to ensure that no single instrument failure will preclude an EOC-RPT from this Function on a valid signal. The TSV Closure, Trip Oil Pressure—Low Allowable Value is selected high enough to detect imminent TSV closure.

This protection is required, consistent with the safety analysis assumptions, whenever THERMAL POWER is $\geq 40\%$ RTP with any recirculating pump in fast speed. Below 40% RTP or with the recirculation in slow speed, the Reactor Vessel Steam Dome Pressure—High and the Average Power Range Monitor (APRM) Fixed Neutron Flux—High Functions of the Reactor Protection System (RPS) are adequate to maintain the necessary safety margins.

The automatic enable setpoint is feedwater temperature dependent as a result of the subcooling changes that affect the turbine first stage pressure/reactor power relationship. For operation with feedwater temperature $\geq 420^\circ\text{F}$, an Allowable Value setpoint based on turbine first stage pressure is provided for the bypass function. The Allowable Value setpoint is reduced for operation with a feedwater temperature between 370°F and 420°F .

TCV Fast Closure, Trip Oil Pressure – Low

Fast closure of the TCVs during a generator load rejection results in the loss of a heat sink that produces reactor pressure, neutron flux, and heat flux transients that must be limited. Therefore, an RPT is initiated on TCV Fast Closure, Trip Oil Pressure—Low in anticipation of the transients that would result from the closure of these valves. The EOC-RPT decreases reactor power and aids the reactor scram in ensuring that the MCPR SL is not exceeded during the worst case transient.

(continued)

B 3.7 PLANT SYSTEMS

B 3.7.5 Main Condenser Offgas

BASES

BACKGROUND During unit operation, steam from the low pressure turbine is exhausted directly into the condenser. Air and noncondensable gases are collected in the condenser, then exhausted through the steam jet air ejectors (SJAEs) to the Main Condenser Offgas System. The offgas from the main condenser normally includes radioactive gases.

The Main Condenser Offgas System has been incorporated into the unit design to reduce the gaseous radwaste emission. This system uses a catalytic recombiner to recombine radiolytically dissociated hydrogen and oxygen. The gaseous mixture is cooled by the offgas condenser; the water and condensibles are stripped out by the offgas condenser and moisture separator. The radioactivity of the remaining gaseous mixture (i.e., the offgas recombiner effluent) is monitored downstream of the moisture separator prior to entering the holdup line.

**APPLICABLE
SAFETY ANALYSES**

The main condenser offgas gross gamma activity rate is an initial condition of the Main Condenser Offgas System failure event as discussed in the UFSAR, Section 15.7.1 (Ref. 1). The analysis assumes a gross failure in the Main Condenser Offgas System that results in the rupture of the Main Condenser Offgas System pressure boundary. The gross gamma activity rate is controlled to ensure that during the event, the calculated offsite doses will be well within the limits (NUREG-0800, Ref. 2) of 10 CFR 100 (Ref. 3), or the NRC staff approved licensing basis.

The main condenser offgas limits satisfy Criterion 2 of the NRC Policy Statement.

LCO

To ensure compliance with the assumptions of the Main Condenser Offgas System failure event (Ref. 1), the fission product release rate should be consistent with a noble gas release to the reactor coolant of 100 $\mu\text{Ci}/\text{Mwt}$ -second after decay of 30 minutes. The LCO is conservatively established based on 100 $\mu\text{Ci}/\text{Mwt}$ -second and the original GGNS licensed power level of 3833 MWt.

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