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December 9, 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
December 9, 2002

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

GNRO-2002/00098

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-2002/00091 letter dated October 25, 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 be "CAB/MJL".

CAB/MJL
attachment:
cc:

GGNS Technical Specification Bases Revised Pages
(See Next Page)

December 9, 2002
 GNRO-2002/00098
 PAGE 2 of 2

cc:

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
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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-2002/00098

GGNS Gulf Technical Specification Bases Revised Pages

dated

December 9, 2002

LDC#	BASES PAGES AFFECTED	TOPIC of CHANGE
02109	B 3.8-8a, B 3.8-8b, B 3.8-9	Addition of wording to Technical Specification Bases Section B 3.8.1 related to extended Allowed Outage Times for DG's. Includes a editorial correction to footer for Technical Bases page B 3.8-9.

BASES

ACTIONS

B.4 (continued)

for an inoperable Division 3 DG when Condition B may have already been entered for another equipment inoperability and is still in effect).

The second Completion Time (14 days) applies to an inoperable Division 1 or Division 2 DG and is a risk-informed allowed outage time (AOT) based on a plant specific risk analysis. The extended AOT would typically be used for voluntary planned maintenance or inspections but can also be used for corrective maintenance. However, use of the extended AOT for voluntary planned maintenance should be limited to once within an operating cycle (18 months) for each DG (Division 1 and Division 2). Additional contingencies are to be in place for any extended AOT duration (greater than 72 hours and up to 14 days) as follows:

1. Weather conditions will be evaluated prior to entering an extended DG AOT for voluntary planned maintenance. An extended DG AOT will not be entered for voluntary planned maintenance purposes if official weather forecasts are predicting severe conditions (hurricane, tropical storm, tornado, or snow/ice storm) that could significantly threaten grid stability during the planned outage time.
2. The condition of the offsite power supply and switchyard will be evaluated.
3. No elective maintenance will be scheduled within the switchyard that would challenge offsite power availability during the proposed extended DG AOT.
4. Operating crews will be briefed on the DG work plan whenever the extended AOT period is used, with consideration given to key procedural actions that would be required in the event of a loss of offsite power or station blackout. It is expected that the Division 3 DG can be cross-connected and ready to power required shutdown equipment on either Division 1 or Division 2 ESF bus within two hours of determining a need to cross-connect.

(continued)

BASES

ACTIONS

B.4 (continued)

5. High pressure injection systems (HPCS and RCIC) and the Division 3 DG (HPCS DG) will not be taken out of service for planned maintenance while DG Division 1 or 2 is out of service for extended maintenance.

The third Completion Time for Required Action B.4 established a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an

(continued)

BASES

ACTIONS

B.4 (continued)

offsite circuit is inoperable and that circuit is subsequently restored OPERABLE, the LCO may already have been not met for up to 72 hours. This situation could lead to a total of 17 days, since initial failure to meet the LCO, to restore the DG. At this time, an offsite circuit could again become inoperable, the DG restored OPERABLE, and an additional 72 hours (for a total of 20 days) allowed prior to complete restoration of the LCO. The 17 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the Completion Times means that the three Completion Times apply simultaneously, and the most restrictive Completion Time must be met.

As in Required Action B.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition B was entered.

C.1 and C.2

Required Action C.1 addresses actions to be taken in the event of concurrent failure of redundant required features. Required Action C.1 reduces the vulnerability to a loss of function. The rationale for the 12 hours is that Regulatory Guide 1.93 (Ref. 6) allows a Completion Time of 24 hours for two required offsite circuits inoperable, based upon the assumption that two complete safety divisions are OPERABLE. When a concurrent redundant required feature failure exists, this assumption is not the case, and a shorter Completion Time of 12 hours is appropriate. These features are designed with redundant safety related divisions (i.e., single division systems are not included in the list, although, for this Required Action, Division 3 is considered redundant to Division 1 and 2 ECCS). Redundant required features failures consist of any of these features that are inoperable, because any inoperability is on a division redundant to a division with inoperable offsite circuits.

(continued)