

April 23, 2003

Mr. William A. Eaton  
Vice President, Operations GGNS  
Entergy Operations, Inc.  
P.O. Box 756  
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 - ISSUANCE OF AMENDMENT  
RE: CORRECTIONS AND CLARIFICATIONS TO CERTAIN REQUIREMENTS  
AND INFORMATION (TAC NO. MB6553)

Dear Mr. Eaton:

The U. S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 157 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment revises the Technical Specifications (TSs) in response to your application dated September 18, 2002.

The amendment revises several TS Limiting Conditions for Operation and Administrative sections to correct or clarify certain requirements and information as summarized below:

The revisions to TS 3.3.7.1, 5.2, 5.5.8.b, 5.6.5.a.5, and 5.7 are editorial and maintain compliance with the intent of regulatory requirements. The revision to TS 5.3.1 is intended to provide consistency between the TS and the Quality Assurance Program Manual as approved by the NRC staff. The revisions to TS 5.5.11 are intended to maintain consistency between the TS and Section 50.59 of Title 10 of the *Code of Federal Regulations*. The revision to TS 3.6.5.4 corrects the bounding value to be consistent with the current Final Safety Analysis Report analyses.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

*/RA/*

David H. Jaffe, Sr. Project Manager, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosures: 1. Amendment No. 157 to NPF-29  
2. Safety Evaluation

cc w/encls: See next page

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The amendment revises several TS Limiting Conditions for Operation and Administrative sections to correct or clarify certain requirements and information as summarized below:

The revisions to TS 3.3.7.1, 5.2, 5.5.8.b, 5.6.5.a.5, and 5.7 are editorial and maintain compliance with the intent of regulatory requirements. The revision to TS 5.3.1 is intended to provide consistency between the TS and the Quality Assurance Program Manual as approved by the NRC staff. The revisions to TS 5.5.11 are intended to maintain consistency between the TS and Section 50.59 of Title 10 of the *Code of Federal Regulations*. The revision to TS 3.6.5.4 corrects the bounding value to be consistent with the current Final Safety Analysis Report analyses. A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

David H. Jaffe, Sr. Project Manager, Section 1  
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Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-416

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2. Safety Evaluation

cc w/encls: See next page

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NRR-100

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NRR-058

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DATE	4/04/03	4/09/03	4/14/03	4/22/03

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ENERGY OPERATIONS, INC.  
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SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION  
ENERGY MISSISSIPPI, INC.  
DOCKET NO. 50-416  
GRAND GULF NUCLEAR STATION, UNIT 1  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 157  
License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Entergy Operations, Inc. (the licensee) dated September 18, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Facility Operating License No. NPF-29 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 157, are hereby incorporated into this license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Robert A. Gramm, Chief, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: April 23, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 157

FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
3.3-73	3.3-73
3.6-62	3.6-62
5.0-2	5.0-2
5.0-3	5.0-3
5.0-5	5.0-5
5.0-14	5.0-14
5.0-16	5.0-16
5.0-18	5.0-18
5.0-22	5.0-22
5.0-23	5.0-23

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 157 TO FACILITY OPERATING LICENSE NO. NPF-29

ENTERGY OPERATIONS, INC., ET AL.

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

## 1.0 INTRODUCTION

By letter to the U. S. Nuclear Regulatory Commission (Commission, the staff, or NRC), dated September 18, 2002 (Reference 7.1), Entergy Operations, Inc., et al. (Entergy or the licensee) submitted a request for revisions to the Grand Gulf Nuclear Station, Unit 1 (GGNS), Technical Specifications (TSs). The revisions would correct or clarify certain requirements and information in the TS Limiting Conditions for Operation (LCO) and Administrative sections, as summarized below:

The revisions to TSs 3.3.7.1, 5.2, 5.5.8.b, 5.6.5.a.5, and 5.7 are either administrative, editorial, or typographical corrections and maintain compliance with the intent of regulatory requirements. The revision to TS 5.3.1 is intended to provide consistency between the TSs and the Quality Assurance Program Manual (QAPM), as approved by the NRC staff; the revisions to TS 5.5.11 are intended to maintain consistency between the TSs and Section 50.59 of Title 10 of the *Code of Federal Regulations* (10 CFR); and the revision to TS 3.6.5.4 corrects the bounding value to be consistent with the current Final Safety Analysis Report (FSAR) analyses.

## 2.0 REGULATORY EVALUATION

The staff finds that the licensee, in Sections 3.0, 4.0, and 5.0 of Reference 7.1, identified the applicable regulatory requirements. The regulatory requirements which the staff applied in its review of the application included: 10 CFR 50.36, 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.91, and 10 CFR 50.92.

## 3.0 TECHNICAL EVALUATION

### 3.1 Administrative, Editorial, and Typographical Changes

Upon review of the revisions to the following TSs as discussed below, the NRC staff concludes that the revisions are either administrative, editorial, or typographical corrections and finds them acceptable.

### 3.1.1 Technical Specification 3.3.7.1

TS 3.3.7.1, "Control Room Fresh Air (CRFA) System Instrumentation," was amended as part of the Alternative Accident Source Term Full-Scope application, as approved by Amendment Number 145 to the GGNS Operating License. During this process, the change to Condition B was issued as submitted, but was not worded per the Nuclear Energy Institute's (NEI) Writers Guide (Reference 7.2). This error was noted during the implementation phase of this amendment, but was determined not to be correctable without a formal request from the licensee. The proposed revision corrects this error by adding the words "not met" to Condition B.

The format and content of the TS is controlled through the utilization of a standard writer's guide, Reference 7.2, the guidance currently being utilized. The guidance in Section 4.1.6.i.5 of Reference 7.2 stipulates that certain conditions end with the phrase "not met." This phrase was omitted from Condition B of this TS in Amendment Number 145, which approved the Full-Scope Implementation of the Alternative Accident Source Term. This revision is strictly administrative in nature and has no impact on the operation of the plant. The requested revision will bring the TS back into compliance with Reference 7.2 and with NUREG-1434, Revision 2 (Reference 7.3). The NRC staff concludes that this proposed change is acceptable.

### 3.1.2 Technical Specification 5.2

TS 5.2, "Organization," Subsections 5.2.1, "Onsite and Offsite Organizations," and 5.2.2, "Unit Staff," currently contain job terminology that is no longer desired for use at the site. The current terminology is also inconsistent with that used in the latest revision of American National Standards Institute/American Nuclear Society (ANSI/ANS) 3.1 (Reference 7.4), to which the site is committed. The specific functions related to this proposed revision are in the radiation monitoring and controls area and would change "health physics" to "radiation protection activities."

The proposed revisions to TSs 5.2.1 and 5.2.2 are administrative in nature and reflect the current terminology and titles for positions performing the related activities at the site. The proposed revisions only affect those positions pertaining to radiation protection related work activities. The requirements of TS 5.3, "Unit Staff Qualifications," will remain applicable to these positions. Therefore, the revisions have no effect on the qualifications, functions, or organizational freedom of the positions affected and the NRC staff concludes that the proposed changes are acceptable.

### 3.1.3 Technical Specification 5.3

TS 5.3, "Unit Staff Qualifications," Subsection 5.3.1, currently commits the site to the 1971 version of ANSI N18.1 (Reference 7.5) for members of the Unit Staff. This version has been superseded by a later version designated as ANSI/ANS 3.1-1978 (Reference 7.4). This later version was endorsed in the new common QAPM for all Entergy sites and was approved by letter from John N. Hannon (NRC) to Michael R. Kansler (Entergy), dated November 6, 1998, (Reference 7.6). The proposed revision will not affect any special restrictions contained in TS 5.3.1.

This proposed revision would eliminate the need for maintaining dual qualification/certification records for GGNS personnel. Currently the TS invokes a different standard than does the QAPM which has led to duplicated documentation, since the different versions are not exactly the same. This revision is considered administrative in nature since the NRC has previously approved the use of ANSI/ANS 3.1-1978 as part of the approval of the current QAPM for Entergy. The technical merits of the two standards were compared and deemed appropriate during the approval process for the QAPM. Thus, the TS reference to the 1971 version of ANSI N18.1 will be replaced with ANSI/ANS 3.1-1978.

A statement, "Except as clarified in the Quality Assurance Program Manual" is also being proposed to allow the use of the QAPM as the single document to control exceptions or clarifications to the standard. This is proposed to minimize the potential for having conflicting upper tier documents. Additionally, this will allow Entergy to have to change only one document if any additional clarifications are needed in the future. The current QAPM already contains some clarifications that are not currently in the TS. Special requirements contained in TS 5.3.1 for the radiation protection manager and the shift technical advisor positions will not be changed by the proposed amendment. The NRC staff concludes that these administrative revisions are acceptable.

#### 3.1.4 Technical Specification 5.5.8 b

TS 5.5.8.b contains requirements for an Explosive Gas and Storage Tank Radioactivity Monitoring Program. A typographical error was made in this TS during the initial conversion to the Improved Technical Specifications, issued as Amendment Number 120 in a NRC letter to Mr. C. Randy Hutchinson, dated February 21, 1995 (Reference 7.7). The word "or" is being replaced with the word "for." The proposed revision has no bearing on the technical content of the existing specification and is clearly typographical in nature. The NRC staff concludes that this proposed revision is acceptable.

#### 3.1.5 Technical Specification 5.5.11

TS 5.5.11, "Technical Specifications (TS) Bases Control Program," contains wording that is no longer consistent with that used in the revised 10 CFR 50.59 rule, "Changes, tests, and experiments." The *Federal Register* Notice publishing the revised rule contained guidance that allowed continued use of current programs without any issues. Revised wording was proposed via the Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler Process as TSTF-364, which was subsequently approved by the NRC. Entergy proposed this revision to remain consistent with Reference 7.3 and 10 CFR 50.59.

The NRC amended 10 CFR 50.59 concerning the authority for licensees of production or utilization facilities to make changes to the facility or procedures, or to conduct tests or experiments, without prior NRC approval. The final rule clarifies the specific types of changes, tests, and experiments conducted at a facility that require evaluation, and revises the criteria licensees must use to determine when NRC approval is needed before such changes, tests, or experiments can be implemented. The final rule also adds definitions for terms that have been subject to differing interpretations and reorganizes the rule language for clarity. The Bases Control Program required by TS 5.5.11 allows Entergy to make changes to the Bases without NRC approval provided the change does not "involve" a change to the FSAR or Bases that involve an "unreviewed safety question," as defined in the previous version of 10 CFR 50.59.

With the revision to 10 CFR 50.59, the definition of "unreviewed safety question" was eliminated. Therefore, the TS is revised to be consistent with the revision to 10 CFR 50.59. This is considered to be an administrative change since the NRC has previously approved the change being sought. The revision is consistent with Reference 7.3 and the NRC staff concludes that it is acceptable.

### 3.1.6 Technical Specification 5.6.5.a.5

TS 5.6.5.a.5, "Core Operating Limits Report (COLR)," was revised by Amendment Number 146, as issued by letter from the NRC dated April 26, 2001 (Reference 7.8). In the safety evaluation for Reference 7.8, the NRC documented a need for the licensee to revise the TSs to clarify certain references contained therein. This revision provides the requested clarification.

The current reference to LCO 3.3.1.1 does not identify the particular function to which the COLR applies. The proposed revision clarifies that the setpoint limits for function 2.d of Table 3.3.1.1-1, the Average Power Range Monitor flow biased simulated thermal power-high trip, are to be specified in the COLR. Table 3.3.1.1-1 does not need revision since footnote b already states that the allowable values for this function are specified in the COLR.

The NRC staff identified the desire for this revision in the safety evaluation for Reference 7.8. In this regard, the NRC staff documented an understanding that Entergy would revise this TS in a reasonable period of time. The safety evaluation for Reference 7.8 stated that this proposed clarification had no direct effect on the determination of the safety limit minimum critical power ratio.

The proposed revision is consistent with the guidance contained in the safety evaluation associated with Reference 7.8 and, therefore, the NRC staff finds it acceptable.

### 3.1.7 Technical Specification 5.7

TS 5.7, "High Radiation Area," Subsections 5.7.1, 5.7.2, and 5.7.3, establish administrative controls for high radiation area entry posting and guarding. Subsections 5.7.1 and 5.7.2 currently refer to job titles/functions that are no longer desired for use at the station. In the case of Subsection 5.7.3, the current wording has led to some confusion as to when a guard must be posted.

The proposed revisions to TS 5.7.1 and 5.7.2 involve the title descriptions for personnel performing radiation protection activities. The term "health physics technician" is changed to "health physicists" and "health physics supervision" is changed to "radiation protection supervision." The revisions do not change the qualification requirements or the technical capabilities of the assigned individuals currently in the affected positions. These revisions are administrative in nature and are intended to reflect the current terminology used in the industry.

In addition, the phrase "shift superintendent on duty" in TS 5.7.2 is revised to "operations shift management." The current wording causes confusion as to the level of involvement required of the shift superintendent regarding key control. This revision clarifies that the control of keys for doors that are locked to prevent unauthorized entry into certain high radiation areas may be delegated to any of the operations shift management positions. The proposed revision does

not reduce the effectiveness of controls for prevention of unauthorized entry into the locked high radiation areas.

The proposed revision to TS 5.7.3 is intended to clarify the associated requirements by either having a guard posted or meeting the other stipulations of the specification at all times. This will eliminate the need to determine if a guard can be posted. Additionally, TS 5.7.3 provides a discussion concerning use of barricades and postings for areas  $\geq 1000$  mrem/hr. Clarification is necessary to remove the ambiguity concerning the posting of guards. The proposed revision eliminates the need for determining if a guard can be posted and proposes to require either a guard be posted or that the area be controlled as required by the TS. The requirement that restricts access to areas of high radiation levels will continue to be assured by the proposed revision.

The NRC staff has reviewed these proposed revisions and finds them acceptable.

### 3.2 Technical Specification 3.6.5.4

The normal (or initial) drywell-to-primary containment differential pressure affects the containment's pressure suppression performance during design basis accident scenarios. Drywell-to-primary containment differential pressure is controlled via the normal drywell vacuum breaker setpoints, specified in TS 3.6.5.4, "Drywell Pressure." The setpoint for the negative drywell-to-primary containment differential pressure limits the drywell side suppression pool water level such that the drywell pressure that results from a Loss of Coolant Accident does not become unacceptably high (due to the delay in suppression pool vent clearing), and such that there will be no equipment damage in the drywell due to flow over the weir wall during an inadvertent upper containment pool dump.

The current TS lower limit value of -0.26 psid was used in the calculations for weir wall overflow (Reference 7.9), and the results indicated that there were no adverse consequences from weir wall overflow.

The effect of initial drywell-to-primary containment differential pressure is evaluated in the GGNS Updated FSAR (UFSAR) (Reference 7.10). The results of three cases are reported: Case A - no differential pressure, Case B - positive differential pressure, and Case C - negative differential pressure. In Case C, the initial negative differential pressure would cause top vent clearing to occur later (i.e., to delay the vent clearing), which would result in a higher peak drywell pressure.

Case C reflects an analysis that was performed to address the effect for GGNS using a negative differential pressure of -0.25 psid. This corresponds to an increase in weir annulus water level above suppression pool level of 7 inches. The results indicated that this pressure difference delayed top vent clearing by approximately 0.03 seconds and increased the drywell pressure by approximately 0.3 psi at the time of top vent clearing. The peak drywell pressure increased by approximately 0.35 psi. The increase in peak drywell pressure is judged by the licensee to be very small, considering the conservative assumptions and methods of the drywell break analysis. The NRC staff has reached the same conclusion.

The value that was assumed for the vent clearing analysis in Reference 7.10 and Reference 7.11 was -0.25 psid, not -0.26 psid as contained in TS 3.6.5.4. Since the current

TS value (-0.26 psid) is not supported by the vent clearing analysis, the discrepancy was documented in the plant's Corrective Action Program and the bounding limit of -0.25 psid was placed under administrative controls by the licensee until the LCO could be revised.

The staff has reviewed Entergy's proposed TS setpoint revision for the drywell-to-primary containment (negative) differential pressure and has found it to be acceptable, since it is supported by acceptable analytical results.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Mississippi State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes requirements with respect to installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. Additionally, the amendment also changes requirements in recordkeeping, reporting, or administrative procedures or requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (67 FR 75871, published December 10, 2002). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### 7.0 REFERENCES

- 7.1 GNRO-2002/00030, William A. Eaton (Entergy) letter to NRC, "License Amendment Request, Corrections and Clarifications to Certain Requirements and Information (LDC 2002-035)," dated September 18, 2002.
- 7.2 NEI 01-03, "Writer's Guide for the Improved Standard Technical Specifications."
- 7.3 NUREG-1434, Revision 2, "Standard Technical Specifications, General Electric Plants BWR/6," dated June 2001.

- 7.4 "American National Standard for Selection and Training of Nuclear Power Plant Personnel," ANSI/ANS-3.1-1978.
- 7.5 "Selection and Training of Nuclear Power Plant Personnel," ANSI N18.1 - 1971.
- 7.6 Letter from John N. Hannon (NRC) to Michael R. Kansler (Entergy), "Consolidation of Quality Assurance (QA) Programs into One Quality Assurance Program Manual for all Entergy Sites-Arkansas Nuclear One, Grand Gulf Nuclear Station, River Bend Station, and Waterford Steam Electric Station TAC M97893)," dated November 6, 1998.
- 7.7 NRC letter to Mr. C. Randy Hutchinson (Entergy), dated February 21, 1995, "Issuance of Amendment No. 120 to Facility Operating License No. NPF-29 Grand Gulf Nuclear Station, Unit 1 (TAC No. M88101)."
- 7.8 Letter from the NRC to William A. Eaton (Entergy), "Grand Gulf Nuclear Station, Unit 1, Issuance of Amendment Re: Revision of the Minimum Critical Power Ratio Safety Limit for Cycle 12 Operation (TAC No. MB0514)," dated April 26, 2001.
- 7.9 L. F. Dale to the U. S. Nuclear Regulatory Commission (USNRC), dated August 19, 1982, AECM 82/353.
- 7.10 GGNS Updated Final Safety Analysis Report (UFSAR), Chapter 6.2.1.1.6, "Suppression Pool Dynamic Loads."
- 7.11 L. F. Dale to the USNRC, dated October 22, 1982, AECM-82/497 (see Action Plan 31, Item 3).

Principal Contributors: B. Vaidya  
S. Miranda

Date: April 23, 2003