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GNRO-2003/00053

October 24, 2003

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

Subject: Application for Technical Specification Improvement to Revise Technical Specification 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves", Using the Consolidated Line Item Improvement Process (LDC 2003-090)
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following Amendment for Grand Gulf Nuclear Station, Unit 1 (GGNS).

The proposed changes would revise the required action within TS 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves" for the condition of having one or more SDV vent or drain lines with one valve inoperable. These changes are based on Technical Specifications Task Force (TSTF) Change Traveler, TSTF-404 (Revision 0) that has been approved generically for the BWR 6 Standard Technical Specifications (STS), NUREG-1434, Revision 2. The availability of this TS improvement was announced in the *Federal Register* on April 15, 2003 as part of the Consolidated Line Item Improvement Process (CLIIP). In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the State of Mississippi.

Attachment 1 provides a description of the proposed change and the requested confirmation of applicability. The existing TS pages annotating the proposed changes are provided in Attachment 2. Changes to the TS Bases associated with the proposed changes to TS 3.1.8 are provided in Attachment 3 for your information and will be implemented in accordance with TS 5.5.11, Technical Specification Bases Control Program. There are no new regulatory commitments associated with this proposed change.

Entergy requests approval of the proposed amendment by March 1, 2004. Once approved, the amendment shall be implemented within 60 days.

ADD

If you have any questions or require additional information, please contact Matt Crawford at 601-437-2334.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 24, 2003.

Sincerely,



JSF/MLC/amt

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. Changes to Technical Specification Bases Pages – For Information Only

cc: U. S. Nuclear Regulatory Commission
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Mr. T. L. Hoeg, GGNS Senior Resident
Mr. D. E. Levanway (Wise Carter)
Mr. L. J. Smith (Wise Carter)
Mr. N. S. Reynolds
Mr. H. L. Thomas

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-29 for Grand Gulf Nuclear Station (GGNS). The proposed changes would revise the required action within TS 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves" for the condition of having one or more SDV vent or drain lines with one valve inoperable.

These changes are based on Technical Specifications Task Force (TSTF) change traveler TSTF-404 (Revision 0) that has been approved generically for the BWR/6 Standard Technical Specifications (STS), NUREG-1434, Revision 2. The availability of this Technical Specification improvement was announced in the *Federal Register* on April 15, 2003 as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy Operations, Inc., (Entergy) has reviewed the safety evaluation published on April 15, 2003 (68 FR18294) as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-404. Entergy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to GGNS and justify this amendment for the incorporation of the changes to the GGNS Technical Specifications.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the Technical Specification changes described in TSTF-404 or the NRC staff's model safety evaluation published on April 15, 2003.

3.0 REGULATORY ANALYSIS

3.1 Applicable Regulatory Requirements/Criteria

Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and do not affect conformance with any General Design Criterion (GDC) differently than described in the Updated Final Safety Analysis Report (UFSAR).

3.2 No Significant Hazards Consideration

Entergy has reviewed the proposed no significant hazards consideration determination published on April 15, 2003 as part of the CLIIP. Entergy has concluded that the proposed determination presented in the notice is applicable to GGNS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.3 Environmental Considerations

Entergy has reviewed the environmental evaluation included in the model safety evaluation published on April 15, 2003 as part of the CLIP. Entergy has concluded that the NRC staff's findings presented in that evaluation are applicable to GGNS and the evaluation is hereby incorporated by reference for this application.

4.0 COMMITMENTS

There are no new regulatory commitments associated with this proposed change.

Attachment 2

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Proposed Technical Specification Changes (mark-up)

SDV Vent and Drain Valves
 3.1.8

3.1 REACTIVITY CONTROL SYSTEMS

3.1.8 Scram Discharge Volume (SDV) Vent and Drain Valves

LCO 3.1.8 Each SDV vent and drain valve shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTE

Separate Condition entry is allowed for each SDV vent and drain line.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more SDV vent or drain lines with one valve inoperable.	A.1 Restore valve to OPERABLE status. Isolate the associated line.	7 days
B. One or more SDV vent or drain lines with both valves inoperable.	NOTE 2. An isolated line may be unisolated under administrative control to allow draining and venting of the SDV. B.1 Isolate the associated line.	8 hours
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	12 hours

Attachment 3

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**Changes to Technical Specification Bases Pages
For Information Only**

BASES

APPLICABLE
SAFETY ANALYSES
(continued)

allow continuous drainage of the SDV during normal plant operation to ensure the SDV has sufficient capacity to contain the reactor coolant discharge during a full core scram. To automatically ensure this capacity, a reactor scram (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation") is initiated if the SDV water level exceeds a specified setpoint. The setpoint is chosen such that all control rods are inserted before the SDV has insufficient volume to accept a full scram.

SDV vent and drain valves satisfy Criterion 3 of the NRC Policy Statement.

LCO

The OPERABILITY of all SDV vent and drain valves ensures that, during a scram, the SDV vent and drain valves will close to contain reactor water discharged to the SDV piping. Since the vent and drain lines are provided with two valves in series, the single failure of one valve in the open position will not impair the isolation function of the system. Additionally, the valves are required to be open to ensure that a path is available for the SDV piping to drain freely at other times.

APPLICABILITY

In MODES 1 and 2, scram may be required, and therefore, the SDV vent and drain valves must be OPERABLE. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate controls to ensure that only a single control rod can be withdrawn. Also, during MODE 5, only a single control rod can be withdrawn from a core cell containing fuel assemblies. Therefore, the SDV vent and drain valves are not required to be OPERABLE in these MODES since the reactor is subcritical and only one rod may be withdrawn and subject to scram.

ACTIONS

The ACTIONS table is modified by ⁹Note indicating that a separate Condition entry is allowed for each SDV vent and drain line. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable SDV line. Complying with the Required Actions may allow for continued operation, and subsequent inoperable SDV lines are governed by subsequent Condition entry and application of associated Required Actions.

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next page* } →

(continued)

BASES

ACTIONS
(continued)

A.1

associated line must be isolated to contain the reactor coolant during a scram.

When one SDV vent or drain valve is inoperable in one or more lines, the ~~valves must be restored to OPERABLE status within 7 days~~. The Completion Time is reasonable, given the level of redundancy in the lines and the low probability of a scram occurring during the time the valve(s) are inoperable. The SDV is still isolable since the redundant valve in the affected line is OPERABLE. Since the SDV is still isolable, the affected SDV line may be opened. This allows accumulated water in the line to be drained to preclude a reactor scram on SDV high level. During these periods, the single failure criterion may not be preserved, and a higher risk exists to allow reactor water out of the primary system during a scram.

and the line is not isolated

7day

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Insert*

B.1

If both valves in a line are inoperable, the line must be isolated to contain the reactor coolant during a scram. When a line is isolated, the potential for an inadvertent scram due to high SDV level is increased. ~~Required Action B.1 is modified by a Note that allows periodic draining of the SDV when a line is isolated.~~ During these periods, the line may be unisolated under administrative control. This allows any accumulated water in the line to be drained, to preclude a reactor scram on SDV high level. This is acceptable, since the administrative controls ensure the valve can be closed quickly, by a dedicated operator, if a scram occurs with the valve open.

The 8 hour Completion Time to isolate the line is based on the low probability of a scram occurring while the line is not isolated and unlikelihood of significant CRD seal leakage.

C.1

If any Required Action and associated Completion Time is not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours. The allowed Completion

(continued)

Insert*

The ACTIONS table is modified by a second Note stating that an isoalted line may be unisolated under administrative control to allow draining and venting of the SDV.