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**Subject:** Grand Gulf Phone Call re: MB8939  
**Creation Date:** 11/24/03 3:23PM  
**From:** Michael Webb

**Created By:** MKW@nrc.gov

| Recipients                             | Action      | Date & Time      |
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| entergy.com                            | Transferred | 11/24/03 03:23PM |
| MCRAWF1 ( <u>MCRAWF1@entergy.com</u> ) |             |                  |
| RBYRD ( <u>RBYRD@entergy.com</u> )     |             |                  |

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| nrc.gov               |           |                  |
| owf2_po.OWFN_DO       | Delivered | 11/24/03 03:23PM |
| RAG CC (Robert Gramm) | Opened    | 11/24/03 03:27PM |

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| <b>Notify Recipients:</b>   | Yes      |
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| <b>Reply Requested:</b>     | No       |
| <b>Return Notification:</b> | None     |

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| <b>Status Tracking:</b> | Delivered & Opened |

**From:** Michael Webb  
**To:** MCRAWF1@entergy.com; RBYRD@entergy.com  
**Date:** 11/24/03 3:23PM  
**Subject:** Grand Gulf Phone Call re: MB8939

Matt,

It looks like we can accommodate a 2:00 Tuesday, November 25th, call.

Here is a DRAFT of proposed questions that the reviewers have provided to me. I believe they are relatively unchanged from what I provided to you verbally. They may be revised or deleted based on the telephone call. The phone number for the conference room where the staff will be is 301-415-4100. We can make the determination on who will call whom on Tuesday. I will likely not participate in the call because I need to leave early tomorrow to go to Union Station to pick up an aunt who is visiting for Thanksgiving, but Bob Gramm has graciously agreed to participate in the call in my stead.

Thank you,  
Mike  
>>>

(1) The final paragraph on page 3 of 7 of Attachment 1 to the License Amendment Request states that your request deviates from the improved STS requirements for the RHR isolation function. The requirements for this function formed a basis for the NRC staff approval of Grand Gulf License Amendment 70 (dated September 24, 1990) which addressed the topic of Alternate Decay Heat Removal System (ADHRS) RHR shutdown cooling. Amendment 70 added TS, administrative controls for use of the ADHRS, automatic isolation of the reactor vessel, and automatic injection of water into the vessel. Provide an evaluation to justify changing any commitments made in support of Amendment 70 for placing ADHRS into permanent service.

In addition, in the staff safety evaluation for the ADHRS, the staff specifically gave credit for the Level 3 isolation. Also, ADHRS is applicable for Modes 4 and 5. The proposed changes are also for mode 5 with high water level. Confirm whether the ADHRS will be in operation during mode 5 with high water level. There may be conflict in the operating conditions for the ADHRS and Mode 5 operation with high water level. Please clarify.

(2) Operation with the RHR level 3 low level isolation disabled creates an operation with the potential for draining the reactor vessel (OPDRV) condition by eliminating the automatic protective action in TS. What was your basis for determining that this loss of automatic isolation capability did not create an OPDRV condition?

(3) You have proposed to rely on operator actions based on alarms as initiating information. Control room annunciators are not Class 1E qualified. The U.S.-Canadian Joint Power System Outage Task Force Interim Report discussing the August 14, 2003, blackout indicated that part of the initiating sequence was a line trip ALARM and logging software failure in which operators were not aware of the line trip because the alarm failed and they didn't act to circumvent the problem. What qualified instrumentation will you use and how do you propose to monitor it to ensure the operator actions will be accomplished successfully, and in time, when reactor cavity water level is lowered?

(4) Your request indicated that the occurrence of actuating the isolation logic causing one or both of the isolation valves to automatically close is "infrequent and recoverable." Do you have data on the number of times that this has occurred, as well as the root cause of such occurrences, and any corrective actions that you have taken to prevent re-occurrence? Do other plants that have this level-3 isolation also experience similar operational problems? If so, how are industry corrective action programs addressing the inoperabilities?

(5) Is this request consistent with NUMARC guidance on shutdown operations? Does the request also consider any GE SILs related to draindown events?

**CC:** Bhalchandra Vaidya; Robert Gramm