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Michael A. Krupa
Director
Nuclear Safety Assurance

GNRO-2004/00042

July 22, 2004

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attention: Document Control Desk

Subject: Update on Plans to Address Kaowool Issues

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

Reference: Letter GNRO-2001/00020, "Update on Plans to Address Kaowool Issues"

Dear Sir or Madam:

By referenced letter dated March 8, 2001, GGNS committed to replace our Appendix R required fire barriers that currently rely on Kaowool Fire Wrap with a fire wrap that satisfies all applicable NRC regulatory and technical requirements. The plan to replace GGNS installed Appendix R required Kaowool Fire Barriers with an alternate qualified fire barrier was made with a due date of December 31, 2004. However, complications and unforeseen difficulties in installing the new material necessitated extension of the due date.

Removed Kaowool is being replaced with a 3M Interam[™] E-54A fire wrap system on electrical circuits located in the Containment, Control, and Auxiliary Buildings. At this time approximately 15% of the work in the Containment Building and approximately 75% of the work in the Control Building has been completed. Review of the installation rate for fire wrap installed to date [measured in man hours per square foot (mh/sf) of material installed] reveals that the original GGNS installation estimate was low. This under estimate was the result of GGNS estimators utilizing vendor provided installation rates. Actual field conditions are most work is elevated, congested and the number of interferences is high.

In addition, a number of the applications are non-typical requiring additional engineering hours to resolve. For these reasons the actual installation man-hours and cost to complete this project has increased substantially, necessitating an extension of the original due date of 12/31/2004.

A recovery plan has been developed and approved. The recovery plan includes additional funding and schedule for increasing the number of installer, engineering, and quality control personnel to support an additional crew (one crew utilized to date). This recovery plan will allow completion of the entire project by the end of 2005. Therefore the commitment date is changed to 12/31/2005. This extension was discussed with NRC Project Manager. This commitment change has been evaluated and documented per the requirements of the GGNS commitment management process.

This letter contains a revised commitment as identified in the Attachment. Should you have any questions or require additional information regarding this matter, please contact William B. Abraham at (601) 437-2319.

Sincerely,



MAK/WBA

Attachment: List of Regulatory Commitments

cc: NRC Senior Resident Inspector (w/a)
Grand Gulf Nuclear Station
Port Gibson, MS 39150

U. S. Nuclear Regulatory Commission
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Mr. L. J. Smith (Wise Carter) (w/o)
Mr. N. S. Reynolds (w/o)
Mr. H. L. Thomas (w/o)

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
By 12/31/2005 we now plan to replace our Appendix R required fire barriers currently protected with Kaowool Fire Wrap with a fire wrap that satisfies all applicable NRC regulatory and technical requirements.	X		12/31/05