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GNRO-2004/00061

December 17, 2004

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20 55

SUBJECT: Application for Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

Dear Sir or Madam:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), Entergy Operations, Inc. (Entergy) is submitting a request for an amendment to the Technical Specifications (TS) for Grand Gulf Nuclear Station, Unit 1

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004, as part of the Consolidated Line Item Improvement Process (CLIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change.

The proposed change includes a new commitment as summarized in Attachment 3.

Entergy requests approval of the proposed license amendment by April 30, 2005, with the amendment being implemented within 90 days of approval.

In accordance with 10CFR50.91, a copy of this application, with enclosures, is being provided to the designated Mississippi State Officials.

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I declare under penalty of perjury under the laws of the United States of America that I am authorized by Entergy to make this request and that the foregoing is true and correct.

If you should have any questions regarding his submittal, please contact me or Matt Crawford at 601-437-2334.

Sincerely,



GAW/MLC/amt

- Attachments:
1. Description and Assessment
 2. Proposed Technical Specification Changes (Mark-Ups)
 3. List of Regulatory Commitments

cc: (All Below w/o Attachments)

NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

U. S. Nuclear Regulatory Commission
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Attn: Addressee Only
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Regional Administrator, Region IV
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U.S Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Mr. D. E. Levanway (Wise Carter)
Mr. L. J. Smith (Wise Carter)
Mr. N. S. Reynolds
Mr. H. L. Thomas

**ATTACHMENT 1
to
GNRO-2004/00061**

Description and Assessment

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004, as part of the consolidated line item improvement process (CLIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 5.6.1	Occupational Radiation Exposure Report	Deleted
TS 5.6.4	Monthly Operating Reports	Deleted

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, Entergy is proposing to adopt a part of NRC approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls." Specifically TS 5.6.4 includes a requirement to include in the monthly operating reports any challenges to safety/relief valves. The NRC model safety evaluation addressed the removal of requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief and safety valves (i.e., if a licensee had not yet adopted the associated part of TSTF-258). The proposed change is consistent with the option described in the Notice of Availability published on June 23, 2004 and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, the removal of TS 5.6.1 and TS 5.6.4 resulted in various editorial and formatting changes such as the renumbering of TS sections. These changes do not reflect the renumbering of TS sections nor do they revise technical or administrative requirements.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

5.0 TECHNICAL ANALYSIS

Entergy has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. Entergy has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are

applicable to GGNS and justify this amendment for the incorporation of the changes to the GGNS TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, Entergy is making the following verifications and a regulatory commitment:

1. Entergy is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).
2. GGNS does not have different reactor types or both operating and shutdown reactors.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

Entergy has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIP. 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).

8.0 ENVIRONMENTAL EVALUATION

Entergy has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to GGNS and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIP. Entergy is not proposing variations or deviations from the TS changes described in TSTF-369 (and the limited portion of TSTF-258) or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004, (69 FR 35067).

ATTACHMENT 2
PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was required, receiving exposures > 100 mrem/yr and their associated man rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions. The Occupational Radiation Exposure Report covering the activities of the unit for the previous calendar year shall be submitted by March 31 of each year.

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and process control program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

5.6.5 Core Operating Limits Report (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
- 1) LCO 3.2.1, Average Planar Linear Heat Generation Rate (APLHGR),
 - 2) LCO 3.2.2, Minimum Critical Power Ratio (MCPR),
 - 3) LCO 3.2.3, Linear Heat Generation Rate (LHGR),
 - 4) LCO 3.2.4, Fraction of Core Boiling Boundary (FCBB),
 - 5) LCO 3.3.1.1, RPS Instrumentation, Table 3.3.1.1-1 function 2.d, and
 - 6) LCO 3.3.1.3, Period Based Detection System (PBDS).

(continued)

**Attachment 3
To
GNRO-2004/00061**

List of Regulatory Commitments

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	
Entergy is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)		X	Within 90 days of amendment issuance.