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GNRO-2005/00009

March 7, 2005

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

Subject: Technical Specification Bases Update to the NRC for Period Dated March 1, 2005

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

Dear Sir or Madam:

Pursuant to Grand Gulf Nuclear Station (GGNS) Technical Specification 5.5.11, Entergy Operations, Inc. hereby submits an update of all changes made to GGNS Technical Specification Bases since the last submittal (GNRO-2004/00058 letter dated October 18, 2004 to the NRC from GGNS). This update is consistent with update frequency listed in 10CFR50.71(e).

Entergy discussed the intent of the changes with Mr. Bhalchandra Vaidya, Mr. Craig Harbuck, and Mr. James Pulsipher of the NRC staff during telephone calls on February 24, 2005 and March 1, 2005. The Bases change clarifies which Limiting Condition for Operation (LCO) Condition is appropriate to enter during maintenance on components associated with the air lock door. The need for the Bases clarification was identified recently when planning a maintenance activity that made the door operating mechanism seal inoperable.

This letter does not contain any commitments.

Should you have any questions, please contact Rita Jackson at (601) 437-2149.

Yours truly,

CAB/RRJ
attachment: GGNS Technical Specification Bases Revised Pages
cc: (See Next Page)

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

U.S. Nuclear Regulatory Commission
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Mr. H. L. Thomas

ATTACHMENT to GNRO-2005/00009

Grand Gulf Technical Specification Bases Revised Pages

dated

March 1, 2005

LDC#	BASES PAGES AFFECTED	TOPIC of CHANGE
05008	B 3.6-8; B 3.6-108	The GGNS Tech Spec Bases are being revised to clarify that Condition A of TS 3.6.1.2 should be entered for an inoperable containment airlock penetration seal associated with an air lock door component. A similar clarification is being made to TS 3.6.5.2 for the drywell airlocks.

BASES

ACTIONS (continued)

A.1, A.2, and A.3

With one primary containment air lock door inoperable in one or more primary containment air locks, the OPERABLE door must be verified closed (Required Action A.1) in each affected air lock. In order for a door to be considered OPERABLE, all of its associated component penetration seals must be OPERABLE. Therefore, these Required Actions apply if the door is inoperable due to any inoperable support device/mechanism seal (e.g., operating mechanism seal). This ensures that a leak tight primary containment barrier is maintained by the use of an OPERABLE air lock door. This action must be completed within 1 hour. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1.1, which requires that primary containment be restored to OPERABLE status within 1 hour.

In addition, the affected air lock penetration must be isolated by locking closed the OPERABLE air lock door within the 24 hour Completion Time. The 24 hour Completion Time is considered reasonable for locking the OPERABLE air lock door, considering the OPERABLE door of the affected air lock is being maintained closed.

Required Action A.3 ensures that the affected air lock with an inoperable door has been isolated by the use of a locked closed OPERABLE air lock door. This ensures that an acceptable primary containment leakage boundary is maintained. The Completion Time of once per 31 days is based on engineering judgment and is considered adequate in view of the low likelihood of a locked door being mispositioned and other administrative controls.

Required Action A.3 is modified by a Note that applies to air lock doors located in high radiation areas and allows these doors to be verified locked closed by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of the door, once it has been verified to be in the proper position, is small.

The Required Actions have been modified by two Notes. Note 1 ensures that only the Required Actions and associated Completion Times of Condition C are required if both doors

(continued)

BASES (continued)

APPLICABILITY

In MODES 1, 2, and 3, a DBA could cause a release of radioactive material to the primary containment. In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Therefore, the drywell air lock is not required to be OPERABLE in MODES 4 and 5.

ACTIONS

The ACTIONS are modified by a Note that allows entry and exit to perform repairs on the affected air lock component. If the outer door is inoperable, then it may be easily accessed to repair. If the inner door is inoperable, however, then there is a short time during which the drywell boundary is not intact (during access through the outer door). The ability to open the OPERABLE door, even if it means the drywell boundary is temporarily not intact, is acceptable due to the low probability of an event that could pressurize the drywell during the short time in which the OPERABLE door is expected to be open. The OPERABLE door must be immediately closed after each entry and exit.

A.1, A.2, and A.3

With one drywell air lock door inoperable, the OPERABLE door must be verified closed (Required Action A.1). In order for a door to be considered OPERABLE, all of its associated component penetration seals must be OPERABLE. Therefore, these Required Actions apply if the door is inoperable due to any inoperable support device/mechanism seal (e.g., operating mechanism seal). This ensures that a leak tight drywell barrier is maintained by the use of an OPERABLE air lock door. This action must be completed within 1 hour. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.5.1, "Drywell," which requires that the drywell be restored to OPERABLE status within 1 hour.

In addition, the air lock penetration must be isolated by locking closed the OPERABLE air lock door within the 24 hour Completion Time. The Completion Time is considered reasonable for locking the OPERABLE air lock door, considering that the OPERABLE door is being maintained closed.

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