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Charles A. Bottemiller Manager Plant Licensing

GNRO-2005/00053

August 23, 2005

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

Attention:

Document Control Desk

Subject:

Technical Specification Bases Update to the NRC for Period Dated

August 23, 2005

Grand Gulf Nuclear Station

Docket No. 50-416 License No. NPF-29

Dear Sir and 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-2005/00046 letter dated August 1, 2005 to the NRC from GGNS). This update is consistent with update frequency listed in 10CFR50.71(e).

This letter does not contain any commitments.

Should you have any questions, please contact Michael Larson at (601) 437-6685.

Yours truly,

CAB/MJL

attachment:

GGNS Technical Specification Bases Revised Pages

CC:

(See Next Page)

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ATTACHMENT to GNRO-2005/00053

Grand Gulf Technical Specification Bases Revised Pages

dated

August 23, 2005

LDC#	BASES PAGES AFFECTED	TOPIC of CHANGE
04076	B 3.6-5	Changes to revise airlock seal pressures.
05044	B 3.6-11	Changes to implement Technical Specification Amendment 168 – airlock surveillance relaxation.

B 3.6 CONTAINMENT SYSTEMS

B 3.6.1.2 Primary Containment Air Locks

BASES

BACKGROUND

Two double door primary containment air locks have been built into the primary containment to provide personnel access to the primary containment and to provide primary containment isolation during the process of personnel entry and exit. The air locks are designed to withstand the same loads, temperatures, and peak design internal and external pressures as the primary containment (Ref. 1). As part of the primary containment, the air lock limits the release of radioactive material to the environment during normal unit operation and through a range of transients and accidents up to and including postulated Design Basis Accidents (DBAs).

Each air lock door has been designed and tested to certify its ability to withstand pressure in excess of the maximum expected pressure following a DBA in primary containment. Each of the doors has inflatable seals that are maintained at a 70 psig nominal pressure by the seal air flask and pneumatic system, which is maintained at a pressure ≥ 90 psig. Each door has two seals to ensure they are single failure proof in maintaining the leak tight boundary of primary containment.

Each air lock is nominally a right circular cylinder, 10 ft 2 inches in diameter, with doors at each end that are interlocked to prevent simultaneous opening. The air locks are provided with test connection valves. The air lock air provided with limit switches on both doors in each air lock that provide control room indication of door position. During periods when primary containment is not required to be OPERABLE, the air lock interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent primary containment entry is necessary. Under some conditions, as allowed by this LCO, the primary containment may be accessed through the air lock when the door interlock mechanism has failed, by manually performing the interlock function.

The primary containment air locks form part of the primary containment pressure boundary. As such, air lock integrity and leak tightness are essential for maintaining primary containment leakage rate to within limits in the event of a

(continued)

ACTIONS

D.1 and D.2 (continued)

does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.1.2.1

Maintaining primary containment air locks OPERABLE requires compliance with the leakage rate test requirements of 10 CFR 50, Appendix J (Ref. 2), as modified by approved exemptions. This SR reflects the leakage rate testing requirements with regard to air lock leakage (Type B leakage tests). The leakage rate testing requirements include the airlock test connection valves (Type C leakage tests). The periodic testing requirements verify that the air lock leakage does not exceed the allowed fraction of the overall primary containment leakage rate.

The SR has been modified by two Notes. Note 1 states that an inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. This is considered reasonable since either air lock door is capable of providing a fission product barrier in the event of a DBA. Note 2 has been added to this SR, requiring the results to be evaluated against the acceptance criteria of SR 3.6.1.1.1. This ensures that air lock leakage is properly accounted for in determining the overall primary containment leakage rate. Since the overall primary containment leakage rate is only applicable in MODES 1, 2, and 3 operation, the Note 2 requirement is imposed only during these MODES.

SR 3.6.1.2.2

The seal air flask pressure is verified to be at ≥ 90 psig every 7 days to ensure that the seal system remains viable. It must be checked because it could bleed down during or

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