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GNRO-2005/00065

November 17, 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 November 17, 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-2005/00053 letter dated August 23, 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)

cc:

| | | | |
|---|---|---|---|
| Compton | J. N. | | (w/o) |
| Levanway | D. E. | (Wise Carter) | (w/a) |
| Reynolds | N. S. | | (w/a) |
| Smith | L. J. | (Wise Carter) | (w/a) |

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|---|---|
| NRC Senior Resident Inspector<br>Grand Gulf Nuclear Station<br>Port Gibson, MS 39150 | |
| U.S. Nuclear Regulatory Commission<br>ATTN: Dr. Bruce S. Mallett (w/2)<br>611 Ryan Plaza Drive, Suite 400<br>Arlington, TX 76011-4005 | ALL LETTERS |
| U.S. Nuclear Regulatory Commission<br>ATTN: Mr. **Bhalchandra Vaidya**, NRR/DLPM (w/2)<br>**ATTN: ADDRESSEE ONLY**<br>ATTN: Courier Delivery Only<br>Mail Stop OWFN/7D-1<br>11555 Rockville Pike<br>Rockville, MD 20852-2378 | ALL LETTERS – COURIER DELIVERY (FEDEX, ETC.) ADDRESS ONLY - ****DO NOT USE FOR U.S. POSTAL SERVICE ADDRESS***** NOT USED IF EIE USED |

# ATTACHMENT to GNRO-2005/00065

## Grand Gulf Technical Specification Bases Revised Pages

## dated

## November 17, 2005

| LDC# | BASES PAGES AFFECTED | TOPIC of CHANGE |
|---|---|---|
| 04088 | B 3.4-32a | Changes to Drywell floor drain leakage instrumentation discussion |
| 05065 | B 3.6-89a | Changes to bypass leakage discussion for specific secondary containment isolation valves |

BASES

BACKGROUND (continued)

The Drywell floor drain in-leakage may be monitored by either of the following methods provided their associated surveillance requirements are met.

1. The E31 Main Control Room level indications supplied from the drywell floor drain sump level transmitter. The leakage and change in leakage is manually calculated based on the sump fill time indicated by the level trend on the associated chart recorder.

2. The P45 floor drain sump level transmitters and associated instrumentation. The leakage and change in leakage can be determined by monitoring the associated computer point and recorder which calculates leakage based on the level rate of change.

(continued)

BASES

BACKGROUND (continued)

Lines which penetrate the primary and secondary containment were evaluated for potential bypass leakage paths as summarized in UFSAR Table 6.2-42. Designs provided to preclude through-line leakage are dependent upon the working fluid in the associated system, i.e., air or water. For the instrument air and service air systems, penetration specific leakage limits are applied to control leakage such that the impact to the design basis dose analysis is acceptable. An analysis explicitly evaluating bypass leakage from both the instrument and service air systems has determined that secondary containment isolation is not required. The dose contribution from these sources is included in the doses reported in UFSAR Table 15.6-14 for the design basis accident.

For the Plant Chilled Water system (PCW), an analysis demonstrated that the piping arrangement and loop seals created by the system in the auxiliary building establish an effective barrier to bypass leakage. As a result, secondary containment isolation of the PCW system is not required.

APPLICABLE SAFETY ANALYSES

The SCIVs must be OPERABLE to ensure the secondary containment barrier to fission product releases is established. The principal accidents for which the secondary containment boundary is required are a loss of coolant accident (Ref. 1), a fuel handling accident involving the handling of recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours) (Ref. 3). The secondary containment performs no active function in response to each of these limiting events, but the boundary established by SCIVs is required to ensure that leakage from the primary containment is processed by the Standby Gas Treatment (SGT) System before being released to the environment.

(continued)