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GNRO-2006/00030

May 15, 2006

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

Attention: Document Control Desk

Subject: Technical Specification Bases Update to the NRC for Period Dated
February 16, 2006

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-2006/00008 letter dated February 16, 2006 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,

A handwritten signature in black ink, appearing to be "CAB/MJL".

CAB/MJL
attachment:
cc:

GGNS Technical Specification Bases Revised Pages
(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)

NRC Senior Resident Inspector Grand Gulf Nuclear Station Port Gibson, MS 39150	
U.S. Nuclear Regulatory Commission ATTN: Dr. Bruce S. Mallett (w/2) 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-4005	ALL LETTERS
U.S. Nuclear Regulatory Commission ATTN: Mr. Bhalchandra Vaidya , NRR/DLPM (w/2) ATTN: ADDRESSEE ONLY ATTN: Courier Delivery Only Mail Stop OWFN/7D-1 11555 Rockville Pike 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-2006/00030

Grand Gulf Technical Specification Bases Revised Pages

dated

May 15, 2006

LDC#	BASES PAGES AFFECTED	TOPIC of CHANGE
06022	B 3.10-38, 40, & 41	Revises the wording to remove restriction that early drain down of the upper containment pool can only be performed during refueling outages.
05081	B 3.8-25	Change no makes the Low Lube Oil pressure trip a non-critical protective function for all Emergency Diesel Generators.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.1.12 (continued)

that could challenge continued steady state operation and, as a result, plant safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
- 2) Post maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.13

This Surveillance demonstrates that DG non-critical protective functions:

Generator loss of excitation,
Generator reverse power,
High jacket water temperature,
Generator overcurrent with voltage restraint,
Bus underfrequency (DG 11 and DG 12 only),
Engine bearing temperature high (DG 11 and DG 12 only),
Low turbo charger oil pressure (DG 11 and DG 12 only),
High vibration (DG 11 and DG 12 only),
High lube oil temperature (DG 11 and DG 12 only),
Low lube oil pressure,
High crankcase pressure, and
Generator ground overcurrent (DG 11 and DG 12 only)

are bypassed on an ECCS initiation test signal. The non-critical trips are bypassed during DBAs and provide alarms on an abnormal engine conditions. These alarms provide the operator with necessary information to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against

(continued)

B 3.10 SPECIAL OPERATIONS

B 3.10.9 Suppression Pool Makeup System

BASES

BACKGROUND Maintaining the SPMU inventory in the Upper Containment Pools will lead to delays in completing outage work in a timely manner, particularly with the advent of things like Noble Metal addition technology has led to the need for holding temperature and pressure at a point above the MODE 4 definition of Table 1.1-1.

The purpose of this Special Operations LCO is to allow the Upper Containment Pool to be drained below its normal level such that certain activities can proceed prior to reaching MODE 4. These activities include installation of the gate between the refueling cavity and the upper containment (fuel storage pool) and completely draining the reactor cavity.

APPLICABLE SAFETY ANALYSES Supporting analyses and engineering calculations determined the required water inventory to ensure that the suppression pool makeup function is satisfied if the specified conditions of this Special Operations LCO are met. Supporting analyses differ from those for TS 3.6.2.4 in that a portion of the SPMU volume is assumed to have already been transferred to the suppression pool with the remainder available from the separator storage pool portion of the Upper Containment Pool. These analyses demonstrate that the containment spray function of RHR is not required following a design basis LOCA to protect the containment given the reduced temperature and pressure stipulated by the LCO. An empty reactor cavity creates a large hold-up volume that would significantly deplete the suppression pool inventory if containment spray operation were to occur. The analysis results demonstrate that the containment pressure increase following a DBA LOCA will not be sufficient to result in the auto-initiation of containment spray.

In addition to the design basis analyses, drywell bypass capability analyses (Reference 1) indicate that containment pressure could exceed the containment spray auto-actuation setpoint. Steam bypass leakage and the associated capability analyses are discussed in Reference 4. For the

(continued)

BASES

LCO (continued) cavity fulfills the containment water inventory requirements assumed in the analysis. Once the level of the weir wall separating the refueling cavity from the separator storage pool is reached, Figure 3.10.9-1 only applies to the separator pool. Supporting analyses assume that the weir wall gates are not installed.

Maintaining the fuel storage and transfer canal area pools ensures that water traps inside containment are minimized consistent with the supporting analysis.

The reactor subcritical time, suppression pool average temperature, and reactor steam dome pressure are assumptions of the supporting analyses.

Entry into MODE 4 operation does not require the use of this Special Operations LCO or its ACTIONS.

APPLICABILITY The MODE 3 requirements may only be modified for allowing early drain-down of the Upper Containment Pool during a reactor cool down. The requirements of this LCO provide conservatism in the response of the unit to any event that may occur. Operations in all other MODES are unaffected by this LCO.

ACTIONS A Note has been provided to modify the ACTIONS related to drain-down of Upper Containment Pools-MODE 3. Section 1.3, Completion Times, specifies once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for each requirement of the LCO not met provide appropriate compensatory measures for separate requirements that are not met. As such, a Note has been provided that allows separate entry for each requirement of the LCO.

(continued)

BASES

ACTIONS
(continued)

A.1

With the requirements of the LCO not met (e.g., Upper Containment Pool level not within limits), the draining of the Upper Containment Pool is to be suspended. Thereby, a worsening of the circumstances will be prevented.

A.2

If one or more of the requirements of this Special Operations LCO are not met, the immediate implementation of the Required Action commences activities, which will restore operation consistent with the Special Operations LCO. The Completion Time is intended to require that these Required Actions be implemented in a very short time and carried through in an expeditious manner.

B.1

Required Action B.1 is an alternative Required Action that can be taken instead of Required Actions A.1 and A.2 to restore compliance with the normal MODE 3 requirements, thereby exiting this Special Operations LCOs Applicability. The allowed Completion Time allows sufficient time to reestablish compliance with the appropriate Technical Specification.

C.1

If the requirements of this Special Operations LCO or the normal MODE 3 requirements cannot be met within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. The allowed Completion Time is reasonable, based on operating experience, to reach the required plant conditions and is consistent with the time provided in LCO 3.0.3 for reaching MODE 4 from MODE 3.

(continued)