



Entergy Operations, Inc.
Waterloo Road
P.O. Box 756
Port Gibson, MS 39150
Tel 601 437 6299

Charles A. Bottemiller
Manager
Plant Licensing

GNRO-2006/00054

September 28, 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
September 28, 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-2006/00030 letter dated May 15, 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 that reads "Charles A. Bottemiller".

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)

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/ O-7D1A 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-2006/00054

Grand Gulf Technical Specification Bases Revised Pages

dated

September 28, 2006

LDC#	BASES PAGES AFFECTED	TOPIC of CHANGE
06032	B 3.6-87, 87a	Revises the wording to provide clarification to TS SR 3.6.4.1.3 and SR 3.6.4.1.4.
06039	B 3.8-47	Revises Diesel Fuel Oil testing ASTM testing standard references.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.4.1.3 and SR 3.6.4.1.4

The SGT System exhausts the secondary containment atmosphere to the environment through appropriate treatment equipment. To ensure that all fission products are treated, SR 3.6.4.1.3 verifies that the SGT System will rapidly establish and maintain a pressure in the secondary containment that is less than the lowest postulated pressure external to the secondary containment boundary.

SR 3.6.4.1.4 demonstrates that each OPERABLE SGT subsystem can maintain a reduced pressure in the secondary containment sufficient to allow the secondary containment to be in thermal equilibrium at steady state conditions. The test criterion specified by SR 3.6.4.1.4 includes an allowance for building degradation between performances of the surveillance. This allowance represents additional building in-leakage of 125 scfm.

As discussed in B 3.6.4.2, the SGT System has the capacity to maintain secondary containment negative pressure assuming the failure of all non qualified lines 2 inches and smaller plus other analyzed failures. The number and size of these assumed failures can vary as penetrations are added or removed from the secondary containment boundary. To account for the absence of these assumed failures under test conditions the test criteria specified by SRs 3.6.4.1.3 and 3.6.4.1.4 are modified. These failures could increase secondary containment in-leakage by approximately 300 scfm. To account for this additional in-leakage, the required vacuum level of SR 3.6.4.1.3 is modified to require that the secondary containment can be drawn down to ≥ 0.311 inches of vacuum water gauge in 180 seconds. For the same reason, the required vacuum level of SR 3.6.4.1.4 is also modified to require secondary containment be maintained ≥ 0.311 inches of vacuum water gauge for 1 hour using one SGT subsystem at a flow rate ≤ 4000 cfm. The vacuum level used for these surveillances represents the minimum required to ensure that the integrity of the SGT system boundary will meet its design requirement of reaching (within 180 seconds) and maintaining ≥ 0.25 inches of vacuum water gauge following a postulated accident when combined with the assumed failures.

The primary purpose of these SRs is to ensure secondary containment boundary integrity. The secondary purpose of

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.4.1.3 and SR 3.6.4.1.4 (continued)

these SRs is to ensure that the SGT subsystem, being used for the test, functions as designed. There is a separate LCO 3.6.4.3 with Surveillance Requirements which serves the primary purpose of ensuring OPERABILITY of the SGT system. SRs 3.6.4.1.3 and 3.6.4.1.4 need not be performed with each SGT subsystem. The SGT subsystem used for these Surveillances is staggered to ensure that in addition to the requirements of LCO 3.6.4.3, either SGT subsystem will perform this test. The inoperability of the SGT system does not necessarily constitute a failure of these Surveillances relative to the secondary containment OPERABILITY. Operating experience has shown the secondary containment boundary usually passes these Surveillances when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. UFSAR, Section 15.6.5.
 2. UFSAR, Section 15.7.4.
-

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.8.3.3

The tests of fuel oil prior to addition to the storage tanks are a means of determining whether new fuel oil is of the appropriate grade and has not been contaminated with substances that would have an immediate detrimental impact on diesel engine combustion and operation. If results from these tests are within acceptable limits, the fuel oil may be added to the storage tanks without concern for contaminating the entire volume of fuel oil in the storage tanks. These tests are to be conducted prior to adding the new fuel to the storage tank(s). The limits and applicable ASTM Standards for the tests listed in the Diesel Fuel Oil Testing Program of Specification 5.5.9 are to verify in accordance with the tests specified in ASTM D975 (Ref. 6) that the sample has a water and sediment content of ≤ 0.05 v/o, and a kinematic viscosity at 40EC of ≥ 1.9 centistokes and ≤ 4.1 centistokes.

These tests are required every 92 days for fuel oil in the storage tanks and prior to addition for new fuel oil by Specification 5.5.9. Failure to meet any of the above limits is cause for rejecting the new fuel oil, but does not represent a failure to meet the LCO since the fuel oil is not added to the storage tanks.

Following the initial new fuel oil sample, the fuel oil is analyzed to establish an impurity level of < 2 mg/100 ml when tested in accordance with ASTM 2274-70 (Ref. 6). These additional analyses are required by Specification 5.5.9, Diesel Fuel Oil Testing Program, to be performed within 7 days following addition. The 7 day period is acceptable because the fuel oil properties of interest, even if not within stated

(continued)