Entergy

Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
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Michael A. Balduzzi
Site Vice President

November 2, 2006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

APPLICATION FOR TECHNICAL SPECIFICATION (TS) CHANGE TO ADD LCO 3.0.8 ON THE INOPERABILITY OF SNUBBERS (AND ADOPTION OF TS BASES FOR LCO 3.0.8) USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP)

LETTER NUMBER: 2.06.082

Dear Sir or Madam:

In accordance with the provisions of 10 CFR 50.90, Entergy Nuclear Operations, Inc. (Entergy) is submitting a request for an amendment to the Technical Specifications (TS) for Pilgrim Nuclear Power Station.

The proposed amendment would modify TS requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8. In conjunction with the proposed change, TS Bases for LCO 3.0.8 will be added consistent with Bases Control Program as described in Section 5.5.6 of the Pilgrim Technical Specifications.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and the plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Proposed TS Bases for LCO 3.0.8 are included in Attachment 2 for information only. Attachment 3 provides a summary of the regulatory commitments made in this submittal.

Entergy requests approval of the proposed License Amendment by September 30, 2007, with the amendment being implemented within 60 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Commonwealth of Massachusetts Official.

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If you have any questions or require additional information, please contact Bryan Ford at (508) 830-8403.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 2nd of NOVEMBER 2006.

Sincerely,

Michael A Balduzzi

Michael A. Balduzzi

WGL/dl
Attachments:
1. Description of Proposed Change (3 pages)
2. Proposed Technical Specification Changes (4 pages)
3. Regulatory Commitments (one page)

cc: Mr. James Shea, Project Manager
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ATTACHMENT 1

(3 Pages)

Subject: Description of Proposed Change

Description of Proposed Change

1.0 DESCRIPTION

The proposed amendment would modify Pilgrim Technical Specifications (TS) for inoperable snubbers by adding LCO 3.0.8. In conjunction with the proposed change, TS Bases for LCO 3.0.8 will be added consistent with Bases Control Program as described in Section 5.5.6 of the Pilgrim Technical Specifications.

The proposed addition of LCO 3.0.8 is consistent with Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) change TSTF-372, Revision 4. The availability of this TS improvement was published in the Federal Register on April 4, 2005 as part of the Consolidated Line Item Improvement Process (CLIIP) (Reference 1).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy has reviewed the safety evaluation published as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-372, Revision 4. Entergy has concluded that the justifications provided in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Pilgrim Nuclear Power Station and justify this amendment for the incorporation of the changes to the Pilgrim TS.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the TS changes described in TSTF-372, Revision 4 or the NRC staff's model safety evaluation published in the Federal Register, dated April 4, 2005.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Entergy has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register on April 4, 2005 as part of the CLIIP. Entergy has concluded that the proposed NSHCD presented in the Federal Register Notice is applicable to Pilgrim and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2. Verification and Commitments

As discussed in the notice of availability published in the Federal Register on April 4, 2005 for this TS improvement, plant-specific verifications were performed as follows:

Entergy is adopting the TS Bases for LCO 3.0.8, which provide guidance and details on how to implement the new requirements. LCO 3.0.8 requires that risk be managed and assessed. The Bases also state that while the Industry and NRC guidance on implementation of 10 CFR 50.65(a)(4), the Maintenance Rule, does not address seismic risk, LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that

maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative assessment of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

Entergy will establish TS Bases for LCO 3.0.8 in accordance with the Bases Control Program consistent with Section 5.5.6 of the Pilgrim Technical Specifications.

4.0 ENVIRONMENTAL EVALUATION

Entergy has reviewed the environmental evaluation included in the model safety evaluation published in the Federal Register on April 4, 2005 as part of the CLIIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to Pilgrim and the evaluation is hereby incorporated by reference for this application.

5.0 REFERENCES

1. Federal Register Notice, "Notice of Availability of Model Application Concerning Technical Specification Improvement To Modify Requirements Regarding the Addition of Limiting Condition for Operation 3.0.8 on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process," published April 4, 2005 (70 FR 23252).

Attachment 2

Proposed Technical Specifications Changes (Mark-up)

(4 pages)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

3.0.1 Not Used

3.0.2 Not Used

3.0.3 Not Used

3.0.4 Not Used

3.0.5 Not Used

3.0.6 Not Used

3.0.7 Special Operations LCOs in Section 3.14 allow specified Technical Specifications requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other Technical Specification requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a Mode or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

INSERT #1 → 3.0.8

4.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

4.0.1 Not Used

4.0.2 Not Used

4.0.3 If it is discovered that a Surveillance was not performed within its specified Surveillance Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

INSERT 1:

3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

BASES:

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

3.0.1 Not Used

3.0.2 Not Used

3.0.3 Not Used

3.0.4 Not Used

3.0.5 Not Used

3.0.6 Not Used

3.0.7 There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.14 allow specified Technical Specification requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with those Technical Specification requirements. Unless otherwise specified, all the other Technical Specification requirements remain unchanged. This ensures all appropriate requirements of the Mode or other specified condition, not directly associated with or required to be changed to perform the special test or operation, will remain in effect.

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the Technical Specifications. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable Technical Specification requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO ACTIONS may direct the other LCOs' ACTIONS be met.

It is not required to meet the Surveillances of the other LCO, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and Surveillance Requirements) are required to be met concurrent with the requirements of the Special Operations LCO.

INSERT #2 → 3.0.8

INSERT 2 LCO 3.0.8 Bases

3.0.8 LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not being capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the conditions and required actions entered.

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

Attachment 3

Regulatory Commitments

(one page)

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

LIST OF REGULATORY COMMITMENTS

Regulatory Commitment	Due Date
Entergy will establish the Technical Specification Bases for LCO 3.0.8 as adopted with the approved License Amendment.	Complete within 60 days of approved amendment