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GNRO-2007/00040

July 17, 2007

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject:: License Amendment Request
Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for Grand Gulf Nuclear Station, Unit 1 (GGNS).

The proposed amendment would modify The Technical Specification (TS) related to Control Room Envelope Habitability in accordance with TSTF-448, Revision 3.

Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed changes.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards consideration. The bases for these determinations are included in the attached submittal.

The proposed change does not include any new commitments.

Entergy requests approval of the proposed amendment by July 17, 2008. Once approved, the amendment shall be implemented within 120 days. Although this request is neither exigent nor emergency, your prompt review is requested.

A102

NRR

If you have any questions or require additional information, please contact Bill Brice at 601-368-5076.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 17, 2007.

Sincerely,

WRB/WBB

Attachments:
1. Description and Assessment
2. Proposed Technical Specification Changes (mark-up)
3. Changes to Technical Specification Bases Pages – For Information Only

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Attachment 1

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Description and Assessment

1.0 DESCRIPTION

This letter is a request to amend Operating License NPF-29 for Grand Gulf Nuclear Station, Unit 1 (GGNS).

The proposed amendment would modify Technical Specification (TS) requirements related to control room envelope habitability in TS 3.7.3, "Control Room Fresh Air (CRFA) System" and TS Section 5.5, Programs and Manuals."

The changes are consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-448 Revision 3. The availability of the TS improvement was published in the *Federal Register* on January 17, 2007 as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy has reviewed the safety evaluation dated January 17, 2007 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-448. Entergy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC are applicable to GGNS and justify this amendment for the incorporation of the changes to the GGNS TS.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the TS changes described in the TSTF–448, Revision 3, or the applicable parts of the NRC staff's model safety evaluation dated January 17, 2007 except those pertaining to a pressurized Control Room Envelope. GGNS does not have a pressurized control room.

2.3 License Condition Regarding Initial Performance of New Surveillance and Assessment Requirements

Entergy proposes the following as a license condition to support implementation of the proposed TS changes:

Upon implementation of Amendment No. xxx adopting TSTF–448, Revision 3, the determination of Control Room Envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c.(i), and the assessment of CRE habitability as required by Specification 5.5.13.c.(ii) shall be considered met. Following implementation:

(a) The first performance of SR 3.7.3.4, in accordance with Specification 5.5.13.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from March 2005, the date of the most recent successful tracer gas test, as stated in the June 30, 2005 letter response to Generic Letter 2003–01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.

(b). The first performance of the periodic assessment of CRE habitability, Specification 5.5.13.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March, 2005, the date of the most recent successful tracer gas test, as stated in the June 30, 2005 letter response to Generic Letter 2003–01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

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* as part of the CLIIP. Entergy has concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to GGNS and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

4.0 Environmental Evaluation

Entergy has reviewed the environmental evaluation included in the model safety evaluation dated January 17, 2007 as part of the CLIIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to GGNS and the evaluation is hereby incorporated by reference for this application.

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and do not affect conformance with any General Design Criterion (GDC) differently than described in the Updated Final Safety Analysis Report (UFSAR).

Attachment 2

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Proposed Technical Specification Changes (mark-up)

3.7 PLANT SYSTEM

3.7.3 Control Room Fresh Air (CRFA) System

LCO 3.7.3 Two CRFA subsystems shall be OPERABLE.

NOTE
The control room envelope (CRE) boundary may be opened intermittently under administrative control

APPLICABILITY: MODES 1, 2, and 3,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRFA subsystem inoperable for conditions other than Condition B.	A.1 Restore CRFA subsystem to OPERABLE status.	7 days
B. One or more CRFA subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3.	B.1 Initiate action to implement mitigating actions. AND B.2 Verify mitigating actions ensure CRE occupant exposures to radiological chemical and smoke hazards will not exceed limits. AND	Immediately 24 hours

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3 Restore CRE boundary to OPERABLE status.	90 days
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	12 hours 36 hours
D. Required Action and associated Completion Time of Condition A not met during OPDRVs.	D.1 Place OPERABLE CRFA subsystem in isolation mode. OR D.2 Initiate action to suspend OPDRVs.	Immediately Immediately
E. Two CRFA subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	E.1 Enter LCO 3.0.3.	Immediately
F. Two CRFA subsystems inoperable during OPDRVs. OR One or more CRFA subsystems inoperable due to inoperable CRE boundary during OPDRVs	F.1 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Operate each CRFA subsystem for ≥ 10 continuous hours with the heaters operating.	31 days
SR 3.7.3.2	Perform required CRFA filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.3.3	Verify each CRFA subsystem actuates on an actual or simulated initiation signal.	18 months
SR 3.7.3.4	Perform required CRE unfiltered air inleakage testing in accordance the Control Room Envelope Habitability Program	In accordance with the Control Room envelope Habitability Program

5.5.13 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE [Control Room Fresh Air (CRFA)] System, CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under Design Basis Accident (DBA) conditions without personnel receiving radiation exposures in excess of [5 rem whole body or its equivalent to any part of the body] [5 rem Total Effective Dose Equivalent (TEDE)] for the duration of the accident. The program shall include the following elements:

a. The definition of the CRE and the CRE boundary.

b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.

c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

d. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.

e. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and assessing the CRE boundary as required by paragraphs c and d, respectively.

(b) SERI is required to notify the NRC in writing prior to any change in (i) the terms or conditions of any new or existing sale or lease agreements executed as part of the above authorized financial transactions, (ii) the GGNS Unit 1 operating agreement, (iii) the existing property insurance coverage for GGNS Unit 1 that would materially alter the representations and conditions set forth in the Staff's Safety Evaluation Report dated December 19, 1988 attached to Amendment No. 54. In addition, SERI is required to notify the NRC of any action by a lessor or other successor in interest to SERI that may have an effect on the operation of the facility.

C. The license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Entergy Operations, Inc. is authorized to operate the facility at reactor core power levels not in excess of 3898 megawatts thermal (100 percent power) in accordance with the conditions specified herein.

(2) Technical Specifications

insert Amendment #

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. ~~174~~ are hereby incorporated into this license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

The Surveillance Requirements (SRs) for Diesel Generator 12 contained in the Technical Specifications and listed below, are not required to be performed immediately upon implementation of Amendment No. 169 The SRs listed below shall be successfully demonstrated at the next regularly scheduled performance.

SR 3.8.1.9,
SR 3.8.1.10, and
SR 3.8.1.14

Insert A →

Insert A

Upon implementation of Amendment No. xxx adopting TSTF–448, Revision 3, the determination of Control Room Envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c.(i), and the assessment of CRE habitability as required by Specification 5.5.13.c.(ii), shall be considered met. Following implementation:

(a) The first performance of SR 3.7.3.4, in accordance with Specification 5.5.13.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from March 2005, the date of the most recent successful tracer gas test, as stated in the June 2005 letter response to Generic Letter 2003–01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.

(b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.13.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from March 2005, the date of the most recent successful tracer gas test, as stated in the June 30, 2005 letter response to Generic Letter 2003–01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

Attachment 3

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Changes to Technical Specification Bases Pages
For Information Only

B 3.7 PLANT SYSTEMS

B 3.7.3 Control Room Fresh Air (CRFA) System

BASES

BACKGROUND

The CRFA System provides a ~~radiologically controlled environment from which the unit can be safely operated following a Design Basis Accident (DBA).~~protected environment from which occupants can control the unit following an uncontrolled release of radioactivity, hazardous chemicals, or smoke.

The safety related function of the CRFA System used to control radiation exposure consists of redundant isolation valves in each inlet and exhaust flow path. The system also includes two independent and redundant high efficiency air filtration subsystems for treatment of recirculated air or outside supply air **and a CRE boundary that limits the inleakage of unfiltered air.** Each CFRA subsystem consists of a demister, an electric heater, a prefilter, a high efficiency particulate air (HEPA) filter, an activated charcoal adsorber section (optional), a second HEPA filter, a fan, and the associated ductwork, **valves or** ~~and~~ dampers, **doors, barriers, and instrumentation.** Demisters remove water droplets from the airstream. Prefilters and HEPA filters remove particulate matter, **which** ~~that~~ may be radioactive. The charcoal adsorbers, if utilized, provide a holdup period for gaseous iodine, allowing time for decay.

The CRE is the area within the confines of the CRE boundary that contains the spaces that control room occupants inhabit to control the unit during normal and accident conditions. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident. The CRE is protected for normal operation, natural events, and accident conditions. The CRE boundary is the combination of walls, floor, roof, ducting, doors, penetrations and equipment that physically form the CRE. The OPERABILITY of the CRE boundary must be maintained to ensure that the inleakage of unfiltered air into the CRE will not exceed the inleakage assumed in the licensing basis analysis of design basis accident (DBA) consequences to CRE occupants. The CRE and its boundary are defined in the Control Room Envelope Habitability Program.

With the implementation of the alternative source term (Reference 7), the filtration of elemental and organic iodine is no longer credited in the accident analyses and

(continued)

BASES

BACKGROUND (continued)

is not a safety-related function. Parts of the CRFA System are operated to maintain the **CRE** ~~control room~~ environment during normal operation. Upon receipt of the initiation signal(s) (indicative of conditions that could result in radiation exposure to **CRE occupants** ~~control room personnel~~), the CRFA System automatically switches to the isolation mode of operation to **minimize** ~~prevent~~ infiltration of contaminated air into the **CRE** ~~control room~~. A system of valves isolates the **CRE** ~~control room~~. **CRE** ~~Control room~~ air flow may be recirculated and processed through either of the two filter subsystems.

The CRFA System is designed to maintain the control room environment for a 30 day continuous occupancy after a DBA, per the requirements of GDC 19. CRFA System operation in maintaining the control room habitability is discussed in the UFSAR, Sections 6.5.1 and 9.4.1 (Refs. 1 and 2, respectively).

APPLICABLE SAFETY ANALYSES

The ability of the CRFA System to maintain the habitability of the **CRE** ~~control room~~ is an explicit assumption for the safety analyses presented in the UFSAR, Chapters 6 and 15 (Refs. 3 and 4, respectively).

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APPLICABLE SAFETY ANALYSES (continued)

The CRFA System is assumed to isolate the CRE ~~control room~~ in response to manual initiation following a loss of coolant accident~~, main steam line break, or control rod drop accident~~. Analyses of these events have assumed the CRE ~~control room~~ would be isolated for at least three days. At that time, isolation was terminated and the CRE ~~control room~~ was again ventilated with filtered (i.e., HEPA) outside air. Safety analysis of the ~~control room~~ fuel handling accident has demonstrated that CRE ~~control room~~ isolation is not required for this accident. The radiological doses to CRE occupants ~~control room personnel~~ as a result of the various DBAs are summarized in Reference 4. No single active or passive failure will cause the loss of outside or recirculated air from the CRE ~~control room~~.

The CRFA System provides protection from smoke and hazardous chemicals to the CRE occupants. The analysis of hazardous chemical releases demonstrates that the toxicity limits are not exceeded in the CRE following a hazardous chemical release (Ref. 5). The evaluation of a smoke challenge demonstrates that it will not result in the inability of the CRE occupants to control the reactor either from the control room or from the remote shutdown panels (Ref. 8).

The CRFA System satisfies Criterion 3 of the NRC Policy Statement.

LCO

Two redundant subsystems of the CRFA System are required to be OPERABLE to ensure that at least one is available, **if** ~~assuming~~ a single **active** failure disables the other subsystem. Total CFRA system failure**, such as from a loss of both ventilation subsystems or from an inoperable CRE boundary,** could result in a failure to meet the dose requirements of GDC 19 in the event of a DBA.

Each ~~The~~ CRFA **subsystem** ~~System~~ is considered OPERABLE when the individual components necessary to **limit CRE occupant** ~~control operator~~ exposure are OPERABLE ~~in both subsystems~~. A subsystem is considered OPERABLE when its associated:

a. Fan is OPERABLE;

b. HEPA filter is not excessively restricting flow and is capable of performing its filtration functions; and

(continued)

BASES

LCO (continued)

c. Demister, ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

In order for the CRFA subsystems to be considered OPERABLE, the CRE boundary must be maintained such that the CRE occupant dose from a large radioactive release does not exceed the calculated dose in the licensing basis consequence analyses for DBAs, and that CRE occupants are protected from hazardous chemicals and smoke.

~~In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors. The control room boundary is maintained when the boundary can be rapidly isolated and established to meet in-leakage limits as outlined in Ref. 6.~~

The LCO is modified by a Note allowing the CRE boundary to be opened intermittently under administrative controls. This Note only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with the operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE isolation is indicated.

APPLICABILITY

In MODES 1, 2, and 3, the CRFA System must be OPERABLE to **ensure that the CRE will remain habitable** ~~control operator exposure~~ during and following a DBA, since the DBA could lead to a fission product release.

In MODES 4 and 5, the probability and consequences of a DBA are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining the CRFA System OPERABLE is not required in MODE 4 or 5, except during operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

A.1

With one CRFA subsystem inoperable **for reasons other than an inoperable CRE boundary**, the inoperable CRFA subsystem must be restored to OPERABLE status within 7 days. With the unit in this condition, the remaining OPERABLE CRFA

(continued)

BASES

ACTIONS

A.1 (continued)

subsystem is adequate to perform The CRE occupant protection function ~~control room radiation protection~~. However, the overall reliability is reduced because a ~~single~~ failure in the OPERABLE subsystem could result in loss of CRFA System function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and that the remaining subsystem can provide the required capabilities.

B.1, ~~and~~ B.2, and B.3

If the unfiltered inleakage of potentially contaminated air past the CRE boundary and into the CRE can result in CRE occupant radiological dose greater than the calculated dose of the licensing basis analyses of DBA consequences (allowed to be up to 5 rem TEDE), or inadequate protection of CRE occupants from hazardous chemicals or smoke, the CRE boundary is inoperable. Actions must be taken to restore an OPERABLE CRE boundary within 90 days.

During the period that the CRE boundary is considered inoperable, action must be initiated to implement mitigating actions to lessen the effect on CRE occupants from the potential hazards of a radiological or chemical event or a challenge from smoke. Actions must be taken within 24 hours to verify that in the event of a DBA, the mitigating actions will ensure that CRE occupant radiological exposures will not exceed the calculated dose of the licensing basis analyses of DBA consequences, and that CRE occupants are protected from hazardous chemicals and smoke. These mitigating actions (i.e., actions that are taken to offset the consequences of the inoperable CRE boundary) should be preplanned for implementation upon entry into the condition, regardless of whether entry is intentional or unintentional. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of mitigating actions. The 90 day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a DBA. In addition, the 90 day Completion Time is a reasonable time to diagnose, plan and possibly repair, and test most problems with the CRE boundary.

C.1 and C.2

In MODE 1, 2, or 3, if the inoperable CRFA subsystem or the CRE boundary cannot be restored to OPERABLE status within the required ~~associated~~ Completion Time, the unit must be

(continued)

ACTIONS

C.1 and C.2 (continued)

placed in a MODE that minimizes **accident** risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

D.1, D 2.1, and D2.2

During OPDRVs, if the inoperable CRFA subsystem cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CRFA subsystem may be placed in the isolation mode. This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action **D**.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the **CRE** ~~control room~~. This places the unit in a condition that minimizes **accident** risk.

If applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

~~D~~ E.1

If both CRFA subsystems are inoperable in MODE 1, 2, or 3, **for reasons other than an inoperable CRE,** the CRFA System may not be capable of performing the intended function and the unit is in a condition outside of the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

~~E~~F.1

During OPDRVs, with two CRFA subsystems inoperable, **or with one or more CFRA subsystems inoperable,** action must be taken immediately to suspend activities that present a

(continued)

BASES

ACTIONS (continued)

F.1

potential for releasing radioactivity that might require isolation of the **CRE** ~~control room~~. This places the unit in a condition ~~that minimizes~~ **the accident** risk.

If applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1

This SR verifies that a subsystem in a standby mode starts from the control room on demand and continues to operate. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every month provides an adequate check on this system. Furthermore, the 31 day Frequency is based on the known reliability of the equipment and the two subsystem redundancy available.

SR 3.7.3.2

This SR verifies that the required CRFA testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, and minimum system flow rate. Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.3.3

This SR verifies that each CRFA subsystem starts and operates and that the isolation valves close in $\leq$ 4 seconds on an actual or simulated initiation signal. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.7.1.1 overlaps this SR to provide complete testing of the safety function. While this Surveillance can be performed with the reactor at power, operating experience has shown these components

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.3.3

usually pass the Surveillance when performed at the 18 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. UFSAR, Section 6.5.1.
2. UFSAR, Section 9.4.1.
3. UFSAR, Chapter 6.
4. UFSAR, Chapter 15.
5. Deleted
6. Engineering Evaluation Request 95/6213, Engineering Evaluation Request Response Partial Response dated 12/18/95.
7. Amendment 145 to GGNS Operating License.
8. UFSAR, Section 9.5
9. NEI 99-03, Control Room Habitability Assessment, June 2001.
10. Letter from Eric J. Leeds (NRC) to James W. Davis (NEI) Use of Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability." (ADAMS Accession No. ML043000694).