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Director  
Nuclear Safety Assurance

GNRO-2008/00033

May 6, 2008

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

**Subject:** Three Month Response to NRC Generic Letter 2008-01,  
"Managing Gas Accumulation in Emergency Core Cooling,  
Decay Heat Removal, and Containment Spray Systems"

Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29

**Reference:** Letter dated April 10, 2008 (GNRO-2008/00034), Three Month  
Response Extension Request to NRC Generic Letter 2008-01,  
"Managing Gas Accumulation in Emergency Core Cooling,  
Decay Heat Removal, and Containment Spray Systems"

Dear Sir or Madam:

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 dated January 11, 2008, to request that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling Systems (ECCS), Decay Heat Removal system, and Containment Spray system, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the GL to provide the following (summarized) information:

- (a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL;
- (b) A description of all corrective actions that were determined necessary; and
- (c) the schedule for completion of the corrective actions, and the basis for that schedule.

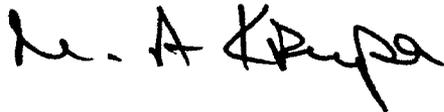
Additionally, the NRC requested that if a licensee cannot meet the requested nine month response date, the licensee "shall provide a response within 3 months of the date of this GL." In the three month response, the licensee was requested to describe "the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action."

The attachments to this letter contain the Grand Gulf Nuclear Station (GGNS) three month response and commitment to NRC GL 2008-01.

If there are any questions or if additional information is required, please contact Dennis Coulter, Senior Licensing Specialist at (601) 437-6595.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 6, 2008.

Yours truly,



MAK/DMC:amm  
Attachments:

1. GGNS Three Month Response to NRC Generic Letter 2008-01
2. Licensee Identified Commitments Table

cc: NRC Senior Resident Inspector  
Grand Gulf Nuclear Station  
Port Gibson, MS 39150

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**Attachment 1**

**GNRO-2008/00033**

**Grand Gulf Nuclear Station Three Month Response to  
NRC Generic Letter 2008-01**

### **Grand Gulf Nuclear Station Three Month Response to NRC Generic Letter 2008-01**

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the three month response requested in NRC GL 2008-01, which was dated January 11, 2008. This response discusses:

- The required evaluations that will not be complete by October 11, 2008 (nine months from the date of GL 2008-01),
- The alternative course of action planned, and
- The basis for the acceptability of the alternative course of action.

For the Grand Gulf Nuclear Station (GGNS), the following systems are considered to be within the scope of GL 2008-01:

- High Pressure Core Spray (HPCS) system, outboard of the injection valve;
- Low Pressure Core Spray (LPCS) system, outboard of the injection valve;
- Residual Heat Removal (RHR) system, outboard of the injection valves (for the following modes of operation: Low Pressure Coolant Injection (LPCI) subsystems A, B, and C, Suppression Pool Cooling, Shutdown Cooling, and Containment Spray.

The requested information for the nine month response to GL 2008-01 includes "A description of the results of evaluations that were performed...", and a description of the resulting corrective actions. The requested evaluations are those necessary to ensure that the subject systems are sufficiently filled with water that they can reliably perform their intended functions. The Generic Letter does not specifically require walk downs of affected piping systems to be performed. However, there has been an emphasis on performing walk downs as a part of the evaluations. Grand Gulf is currently evaluating the need to perform walk downs as part of the response to the Generic Letter. Those systems or portions of systems which are determined to require walk downs will have them performed.

#### Required Evaluations That Will Not Be Complete

Portions of the piping in the afore mentioned systems are located such that inspection of the piping would require one or more of the following:

- Entry into high radiation areas,
- The need to erect scaffolding,
- Prolonged containment or drywell entries during power operation, or
- The need for (or restrictions on) removal of insulation from piping.

Portions of piping which are identified as requiring inspection located in these areas may not be fully inspected or have the inspection documented prior to October 11, 2008. Grand Gulf is currently scheduled to begin its next refueling outage Fall of 2008. This provides little margin for performing the walk downs and documenting the results prior to the 9 month response.

Alternative Course Of Action Planned

GGNS will determine which piping segments need an in-field verification and evaluation. Any piping segments that have not been verified and evaluated prior to the nine month response will be entered into the Corrective Action Program by October 11, 2008, with due dates no later than one month after the restart from our next refueling outage.

Basis for Acceptability

Completion of a portion of any required in-field verification and associated evaluation after the nine month response to the GL is considered to be acceptable based on the following discussion. Detailed evaluations of the as-built piping drawings are expected to be complete prior to the nine month response, including detailed reviews of the drawings for the piping segments that will not yet have received in-field verifications. The in-field verifications to be performed are expected to confirm the conclusions of the completed drawing evaluations. Also, the evaluation of site procedures, which ensure the piping systems are sufficiently full of water to perform their function, is expected to be complete prior to the nine month response.

**Attachment 2**

**GNRO-2008/00033**

**Licensee Identified Commitments Table**

**Licensee Identified Commitments Table**

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
GGNS will determine which piping segments need an in-field verification and evaluation. Any piping segments that have not been verified and evaluated prior to the nine month response will be entered into the Corrective Action Program by October 11, 2008, with due dates no later than one month after the restart from our next refueling outage.	X		One Month after restart from next refueling outage.