



May 15, 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"  
River Bend Station  
Docket No. 50-458  
License No. NPF-47

Reference 1: Letter No. RBG-46803, dated April 9, 2008, Interim Response to Generic Letter 2008-01

File No.: G9.5

RBF1-08-0059  
RBG-46815

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

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- (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." This time period was extended to May 16, 2008, as described in Entergy's letter dated April 9, 2008 (Ref. 1). 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."

Attachment 1 to this letter contains the River Bend Station (RBS) three month response to NRC GL 2008-01. Attachment 2 contains the commitment made in this letter.

If there are any questions or if additional information is required, please contact David Lorfing at 225-381-4157.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 15, 2008.

Sincerely,



Jerry C. Roberts  
Director – Nuclear Safety Assurance

Attachments:

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

cc: NRC Senior Resident Inspector  
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**Attachment 1**

**RBG-46815**

**River Bend Station Three Month Response to NRC  
Generic Letter 2008-01**

### **River Bend 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 River Bend Station (RBS), the following systems are considered to be within the scope of GL 2008-01:

- High Pressure Core Spray (HPCS) system
- Low Pressure Core Spray (LPCS) system
- Residual Heat Removal (RHR) system, including the Low Pressure Coolant Injection (LPCI) mode of operation

RBS does not have a containment spray system.

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 and can reliably perform their intended functions. The Generic Letter does not specifically require walkdowns of affected piping systems to be performed. However, there has been an emphasis on performing walkdowns as a part of the evaluations. River Bend is currently evaluating the need to perform these walkdown as part of the response to the GL. Walkdowns determined to be necessary for those systems or portions of systems will be performed.

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

- entry into the drywell, which is an exclusion area during power operations,
- scaffolding in sensitive areas,
- prolonged containment entries during power operation, or,
- the need for (or restrictions on) removal of insulation from piping.

Portions of piping identified as requiring inspection located in these areas may not be fully inspected prior to October 11, 2008. River Bend does not have planned outage prior to this date, thus, there is no opportunity for performing refueling outage walkdowns or documenting the results prior to the 9 month response. Walkdowns of any piping segments that are determined to need in-field verification that have not been completed prior to October 11, 2008, will be tracked to completion. The due date for the final documentation of any necessary walkdowns will be no later than one month after the restart from refueling outage no. 15.

Completion of any required in-field verifications and associated evaluation after the nine month response to the GL is considered to be acceptable. Detailed evaluations of the as-built piping drawings will be complete prior to the nine month response, including detailed reviews of the drawings for the piping segments requiring 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**

**RBG-46815**

**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	
Walkdowns of any piping segments that are determined to need in-field verification that have not been completed prior to October 11, 2008, will be tracked to completion. The due date for the final documentation of any necessary walkdowns will be no later than one month after the restart from refueling outage no. 15.	<b>X</b>		One month after restart from refueling outage no. 15.