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GNRO-2008/00049

September 02, 2008

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

Subject: Supplemental No. 2 to Information for Licensing Amendment Request
Pertaining to Control Room Envelope Habitability TSTF-448

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

- References:
1. GNRO-2007/00050 - Supplemental Information for Licensing Amendment Request Pertaining to Control Room Envelope Habitability dated August 07, 2007 (ML072250092)
 2. GNRO-2007/00040 - Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process, dated July 17, 2007 (ML072060522)

Dear Sir or Madam:

On July 17, 2007, Entergy Operations, Inc. filed an application to amend the operating license for Grand Gulf Nuclear Station, Unit 1 (GGNS) (above Reference). The proposed amendment would modify the Technical Specification related to Control Room Envelope Habitability in accordance with TSTF-448, Revision 3 under the Consolidated Line Item Improvement Program. This letter provides supplemental information to clarify and correct certain items in the application at the request of NRC reviewers.

Attachment 1 revises the description and assessment on affected pages from the above referenced submittal. The changes are noted with change bars in the right hand column. Attachment 2 provides certain replacement pages for the affected Technical Specification and Operating License Condition pages. Attachment 3 provides revised Technical Specification Bases pages.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(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.

If you have any questions or require additional information, please contact Michael J. Larson at 601-437-6685 or email mlarson@entergy.com.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 02, 2008.

Sincerely,



MAK/MJL/amm

Attachments:

1. Description and Assessment (Markup)
2. Technical Specification and Operating License Condition (Markup)
3. Technical Specification Bases (Markup)

NRC Senior Resident Inspector Grand Gulf Nuclear Station Port Gibson, MS 39150
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Attachment 1

GNRO-2008/00049

Description and Assessment (Markup)

1.0 DESCRIPTION

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

The proposed supplement to 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 (FR 722022) 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 is 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 significant 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. Variation and deviations were previously discussed in the following letters:

GNRO-2007/00050 - Supplemental Information for Licensing Amendment Request Pertaining to Control Room Envelope Habitability dated August 07, 2007

GNRO-2007/00040 - License Amendment Request Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process, dated June 17, 2007

Submitted information in these letters is still valid to this supplement.

A NRC requested variation is requested to Technical Specification Section 5.5.13 and is discussed in Sections 2.4 and 3.2.

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

Entergy proposes the following additional license condition to support implementation of the NRC proposed TS changes:

- (c) The first performance of the periodic assessment of the CRE boundary, Specification 5.5.13.d, shall be within the next 18 months, plus the 136 days allowed by SR 3.0.2, as measured from the date of issuance of this amendment.

This additional license condition supplements license conditions previously submitted in the following letters:

GNRO-2007/00050 - Supplemental Information for Licensing Amendment Request Pertaining to Control Room Envelope Habitability dated August 07, 2007

GNRO-2007/00040 - License Amendment Request Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process, dated July 17, 2007

2.4 Revision of TS Surveillance 3.7.3.4 and TS 5.5.13

Entergy proposes the following revisions and additions to TS Surveillance (SR) R 3.7.3.4 and TS 5.5.13.

Technical Specification Surveillance 3.7.3.4 is editorial revised to add the word "with" so that it states that the testing will be done "in accordance with the Control Room Envelope Habitability Program. The word "with" had been inadvertently left out of the SR and the change is made to comply with the wording specified in TSTF-448.

Additionally a new paragraph "d" added to TS 5.5.13 to:

- (1) Incorporate the responses to the NRC questions in Section 3.2 detailing how the control room envelope (CRE) is maintained.
- (2) Define when the periodic assessment of the CRE boundary in Specification 5.5.13.d should be performed. This assessment has previously been performed as discussed in Section 3.2. First performance of the assessment is also discussed in the proposed License Condition in Section 2.3 that specifies that the assessment is performed within the 18 months, plus the 136 days allowed by SR 3.0.2, from the date of issuance of this amendment.

3.0 Regulatory Analysis

3.1 *No Significant Hazards Consideration Determination*

The no significant hazards consideration determination (NSHCD) performed as submitted in letter GNRO-2007/00040 - License Amendment Request Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3, using the Consolidated Line Item Improvement Process, dated July 17, 2007 remains valid for this supplement.

3.2 NRC Requested Information is included

The NRC staff had the following questions, which were sent by email As follows. Based on the NRC staff's review of the application dated July 17, 2007 (GNRO-2007/00040) (Agency wide Documents and Access Management System (ADAMS) Accession No. ML072060522), and the licensee's statement that the GGNS CRE is not pressurized, the staff has the following question. TSTF-448 Revision 3 was developed for plants with pressurized control room envelopes; however, as stated in the licensee's application GGNS has a non-pressurized CRE. Note that in the programs and manuals section of the standard technical specifications (STS) as modified by TSTF-448 revision 3, paragraph (d) of Section [5.5.18], "Control Room Envelope Habitability Program", specifies a differential pressure (dp) test to be conducted between performances of inleakage testing for the purpose of providing input to a periodic assessment of the control room envelope (CRE) boundary. The NRC staff recognizes that non-pressurized control room envelopes may not be able to conduct a dp test, nevertheless, the NRC staff believes that all plants requesting the adoption of TSTF-448 should include in their request, a method to collect data that will serve as input to a periodic assessment of the CRE boundary. This position is supported by the technical analysis section of TSTF-448 revision 3 on page 8 where an explanation of the basis for paragraph (d) is provided. Consequently, the NRC staff is requesting that the licensee provide a method to collect data, and an explanation of how it is intended to be used, that can be used to make a periodic assessment of the GGNS CRE boundary. The method should, to the extent practicable, provide information that can be used in a manner similar to the manner in which the dp information is to be used that is requested by paragraph (d) of section [5.5.18] of the programs and manuals section of the STS as modified by TSTF-448R3.

Grand Gulf Response to NRC email dated March 12, 2008

Grand Gulf Nuclear Station response to the NRC regarding compliance to NRC Regulatory Guide 1.197 would be performed was documented in GNRO-2007/00040 and 00050, Control Room Envelope Habitability in Accordance with TSTF-448, Revision 3. In the response, GGNS indicated that the Control Room Envelope is NOT pressurized during its isolation mode of operation. The CRE becomes neutral with respect to areas adjacent to the envelope boundary.

Facilities with a positive pressure CRE generally have implemented testing programs that verify that the CRE is at a positive differential pressure relative to adjacent areas. This testing method has been implemented via Technical Specification surveillance requirements for the control room emergency ventilation filtration system. Plants with a CRE design based on isolation without intentional pressurization, i.e., neutral pressure, typically do not have a similar surveillance requirement.

As such, the initial proposed responses for Technical Specification 5.5.13, Control Room Envelope Habitability Program did NOT include measurement at designated locations of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation.

The NRC review of our submittals recognizes that differential pressure tests may not be the appropriate testing for plants with a non-pressurized CRE. However, with Grand Gulf Nuclear Station's adoption of TSTF-448, information should be provided regarding how Grand Gulf collects data and uses this data as input to the periodic assessment between periodic testing of the CRE.

Below is a summary of how Grand Gulf Nuclear Station currently controls gradual degradation of equipment designed to maintain the CRE boundary. This also includes items such as modification, rework, and preventative maintenance activities that could potentially affect the CRE boundary.

Since the CRE is at a positive pressure during normal fresh air operation and neutral pressure during isolation mode, only the components on the suction side, i.e., at negative pressures, of the system will be addressed.

1. Plant maintenance activities such as modifications, rework, and preventive maintenance tasks on components that could affect the CRE are controlled under fleet and plant specific procedures to ensure that the CRE boundary is not degraded by such activities. This is done by design reviews, post maintenance inspections and retests in addition to how these work activities are to be performed.

Administrative procedures controlling performance of work are as follows:

- Fleet Procedures
 - EN-DC-105, Configuration Management
 - EN-DC-115, Engineering Change Development
 - EN-DC-116, Engineering Installation
 - EN-DC-117, Post Modification Testing and Special Instructions
 - EN-DC-134, Design Verification
 - EN-DC-136, Temporary Modifications
 - EN-DC-141, Design Inputs
 - EN-MA-125, Troubleshooting Control of Maintenance Activities
 - Plant Specific Procedures
 - 01-S-07-1, Control Of Work On Plant Equipment And Facilities
 - 01-S-07-37, Control Of Work For Penetrations, Painting, Snubbers, Insulation and Control Room Envelope Breaches
 - 07-S-01-205, Conduct of Maintenance Activities, although designated a maintenance procedure, is used to ensure that plant equipment is available and capable of performing its intended function and as such, details departmental responsibilities and work ethics.
2. Testing of Standby Fresh Air Unit (SBFAU) sealing areas are performed following maintenance activities (rework and preventative) and on set frequencies to ensure that the areas of negative pressures do not leak bypassing emergency filtration system components.
 - System Specific Procedures
 - 06-ME-1Z51-R-0006, (Surveillance) In-Place Testing of Control Room Emergency Filtration System, tests mechanical leak by following maintenance activities in which filtration components were disturbed and every 18 months.

- 17-S-06-Z51-1, Control Room SBFAU Leakage Test, Engineering task performed every 18 months, which involves smoke testing the SPFAU fan housing and filter train doors.
- 3. Fire damper inspection procedures that require opening of duct panels and doors ensures that upon restoration no leakage path exists.
 - System Specific Procedure
 - 06-ME-SP64-R-0045, ventilation System Fire Dampers Inspection (Surveillance) cautions entry into CRE boundaries and ensures that the requirements for penetrations and maintenance breaches are adhered to per 01-S-07-37, Control of Work for Penetrations, Painting, Snubbers, Insulation and Control Room Envelope Breaches.
- 4. The remainder of ducting components such as plenum access doors, duct access doors (rectangular and round), flex connections (vent glass, etc.), plugs, and patches have been fabricated and installed per Mechanical Standard (MS) 32.

Programs and processes that ensure that these types of components that are routinely accessed maintain a leak tight barrier in areas of negative pressures are listed below.

- System condition monitoring is currently performed on a predetermined frequency by the System Engineer for category I and quarterly for category II systems. Monitoring may be performed by plant data system (PDS) monitoring and/or system walkdowns as specified and controlled by the following procedures. These procedures give guidance regarding expectations for monitoring system health and identifying deficiencies.
 - EN-DC-159, System Monitoring Program
 - EN-DC-178, System Walkdowns

Summary:

The initial control room envelope integrity testing was performed in April 2005. GGNS configuration in isolate mode is neutral and the TS operating limit (OL) for in leakage is 2000 cfm plus 10 cfm ingress/egress. The analysis assumptions for GGNS are 2010 cfm applied in the radiological analyses based on isolated configuration and 4060 cfm applied in the toxic gas analyses based on unisolated configuration.

The results of the tests conducted in April 2005 were:

Test	CREVS Mode	In leakage (cfm)
1	A and B Train Isolation	351 +/-19
2	A Train Isolation	238 +/-13
3	A Train Normal (Fresh Air)	812 +/-48

It is reasonable to assume that with the available margin the work practices and programs currently in place have proven sufficient in maintaining the CRE integrity between periodic testing.

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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Technical Specification and Operating License Condition (Mark-up)

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 with the Control Room Envelope Habitability Program	In accordance with the Control Room envelope Habitability Program

with

Programs and Manuals (continued)

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 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. Since the CRE is at a neutral pressure during isolation mode, the CRE will be maintained, including the following:
 1. Plant maintenance activities such as modifications, rework, and preventive maintenance tasks on components that could affect the CRE shall be controlled under fleet, plant and system specific procedures to ensure that the CRE boundary is not degraded by such activities.
 2. Testing of CRFA system sealing areas shall be performed following maintenance activities (rework and preventative) and periodically to ensure that the areas of negative pressures do not leak bypassing emergency filtration system components.
 3. Fire damper inspection procedures that require opening of duct panels and doors shall ensure that upon restoration no leakage path exists.
 4. The remainder of ducting components such as plenum access doors, duct access doors (rectangular and round), flex connections (ventglass, etc.), plugs, and patches will be maintained per paragraph b.
 5. An assessment of the CRE Boundary will be conducted every 18-months. The results of assessing items 1 through 4 shall be trended and used as part of the assessment of the CRE boundary as indicated in paragraph c.

- e. The quantitative limits on unfiltered air leakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air leakage measured by the testing described in paragraph c. The unfiltered air leakage limit for radiological challenges is the leakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air leakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
 - f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered leakage, and assessing the CRE boundary as required by paragraphs c and d, respectively.
-

(41) Fire Protection Program

Energy Operations, Inc. shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in Revision 5 to the Updated Final Safety Analysis Report, and as approved in the Safety Evaluations dated August 23, 1991, and September 29, 2006, subject to the following provisions:

The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(42) Mitigation Strategy License Condition

The Licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:

1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following:

1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:

1. Water spray scrubbing
2. Dose to onsite responders

Insert

(43) Control Room Habitability

Upon implementation of Amendment No. xxx adopting TSTF-44B, Revision 3, the determination of Control Room Envelope (CRE) unfiltered air leakage 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:

Insert

(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.

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(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.

- D. The facility required exemptions from certain requirements of Appendices A and J to 10 CFR Part 50 and from certain requirements of 10 CFR Part 100. These include: (a) exemption from General Design Criterion 17 of Appendix A until startup following the first refueling outage, for (1) the emergency override of the test mode for the Division 3 diesel engine, (2) the second level undervoltage protection for the Division 3 diesel engine, and (3) the generator ground over current trip function for the Division 1 and 2 diesel generators (Section 8.3.1 of SSER #7) and (b) exemption from the requirements of Paragraph III.D.2(b)(ii) of Appendix J for the containment airlock testing following normal door opening when containment integrity is not required (Section 6.2.6 of SSER #7). These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. In addition, by exemption dated December 20, 1986, the Commission exempted licensees from 10 CFR 100.11(a)(1), insofar as it incorporates the definition of exclusion area in 10 CFR 100.3(a), until April 30, 1987 regarding demonstration of authority to control all activities within the exclusion area (safety evaluation accompanying Amendment No. 27 to License (NPF-29). This exemption is authorized by law, and will not present an undue risk to the public health and safety, and is consistent with the common defense and security. In addition, special circumstances have been found justifying the exemption. Therefore, these exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act and the rules and regulations of the Commission.

16a Revised by letter dated January 24, 2007
Revised by Letter dated July 18, 2007

INSERT "A" TO LICENSE CONDITION AS SUBMITTED IN GNRO-2007/00050

- (c) The first performance of the periodic assessment of the CRE boundary, Specification 5.5.13.d, shall be within the next 18 months, plus the 136 days allowed by SR 3.0.2, as measured from the date of issuance of this amendment.

New Page

- E. The licensee shall fully implement and maintain in effect all provision of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security, Safeguards Contingency and Training and Qualification Plan," and were submitted to the NRC on May 18, 2006.

Attachment 3

GNRO-2008/00049

Technical Specification Bases (Mark-up)

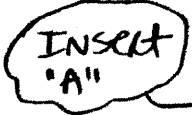
BASES

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.

INSET
"A"



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. ML04300694).

INSERT "A" TO TECHNICAL SPECIFICATION BASES PAGE B 3.7-17

SR 3.7.3.4

This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air leakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem TEDE and the CRE occupants are protected from hazardous chemicals and smoke. This SR verifies that the unfiltered air leakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air leakage is greater than the assumed flow rate, Condition B must be entered. Required Action B.3 allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, Section C.2.7.3, which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 9). These compensatory measures may also be used as mitigating actions as required by Required Action B.2. Temporary analytical methods may also be used as compensatory measures to restore OPERABILITY (Ref. 10). Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope leakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.