

October 15, 2008

Mr. Thomas L. Williamson  
Manager, GGNS COLA Project  
Entergy Nuclear  
1340 Echelon Parkway  
Jackson, MS 39213

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 13 RELATED TO  
SRP SECTION 14.2 FOR THE GRAND GULF COMBINED LICENSE  
APPLICATION

Dear Mr. Williamson:

By letter dated February 27, 2008, Entergy Operations Incorporated (EOI) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, I can be reached at 301-415-2375 or by e-mail at [Leslie.Perkins@nrc.gov](mailto:Leslie.Perkins@nrc.gov).

Sincerely,

**/RA/**

Leslie Perkins, Project Manager  
ESBWR/ABWR Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket No. 052-0024  
eRAI Tracking No. 924, 1038, 1039

Enclosure:  
Request for Additional Information

October 15, 2008

Mr. Thomas L. Williamson  
Manager, GGNS COLA Project  
Entergy Nuclear  
1340 Echelon Parkway  
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APPLICATION

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Sincerely,  
**/RA/**

Leslie Perkins, Project Manager  
ESBWR/ABWR Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket No. 052-0024  
eRAI Tracking No. 1038, 1039, 924  
Enclosure:  
Request for Additional Information  
Distribution:  
PUBLIC  
BSosa, NRO  
MTonacci, NRO  
BAbeywickrama, NRO  
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NRO\_DNRL\_NGE2  
NRO\_DNRL\_NGE1

**ADAMS Accession No. ML082880688**

NRO-002

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|--------|----------|---------|----------------|----------|----------|-----------|
| OFFICE | CHPB/TR  | CHPB/BC | CQVB/TR        | CVQB/BC  | OGC      | NGE2/L-PM |
| NAME   | KStreit  | TFrye   | YDiaz-Castillo | JNakoski | SBrock   | MTonacci  |
| DATE   | 08/28/08 | 09/5/08 | 09/23/08       | 09/23/08 | 09/29/08 | 10/14/08  |

**\*Approval captured electronically in the electronic RAI system.**

**OFFICIAL RECORD COPY**

Grand Gulf, Unit 3 COLA  
Entergy Operations, Inc.  
Docket No. 52-024

SRP Section: 14.02 - Initial Plant Test Program - Design Certification and New License Applicants  
Application Section: 14.2.9 & 14.2.9.1.3

## QUESTIONS

### 14.02-1

FSAR Section 14.2.9.1.3 describes the preoperational test for personnel monitors and radiation survey instruments. Please provide amplifying information as follows:

(a) Describe the general types of personnel monitors and radiation survey instruments that are covered by this test.

(b) Under the heading "Prerequisites", the text states that "High radiation alarm setpoints have been properly established based on sensor location, background radiation level, expected radiation level and low occupational dose prior to the test." Explain how the specification "low occupational dose" is used as an input in establishing radiation alarm setpoints for the personnel monitors and radiation survey instruments covered by this preoperational test.

### 14.02-2

In FSAR Section 14.2.9.1, Site-specific Pre-Operational Tests, GGNS SUP 14.2-1 addresses pre-operational tests applicable to FSAR 14.2.9.1.3, Personnel Monitors and Radiation Survey Instruments Preoperational test. The staff notes that RG 1.68 (Appendix A, Section 1.k (Preoperational Testing-Radiation Protection Systems)) includes "laboratory equipment used to analyze or measure radiation levels and radioactivity concentrations" as one of the system types that should receive pre-operational testing to demonstrate proper operation. Please include a site-specific pre-operational test for laboratory equipment in FSAR Section 14.2.9.1 or justify the absence of such testing.

### 14.02-3

SRP 14.2, Section II, Acceptance Criteria, Section E, "Development, Review and Approval of Test Procedures" subsections i through vii, contain guidance on test specifications that should be available to the NRC staff for the development of individual test procedures. RG 1.68, Regulatory Position C.4, states, "Approved test procedures for satisfying FSAR testing commitments should be made available to the NRC approximately 60 days prior to their intended use." RG 1.206, Regulatory Position, C.I.14.2.3, states, "the COL applicant should also describe the types and sources of design performance requirements and acceptance criteria used to develop detailed test procedures for testing plant SSCs."

In addition, RG 1.206, Regulatory Position, C.III.4.3, states, in part, that "the COL applicant should describe in its application (e.g., within the appropriate section of the FSAR) the proposed approach to addressing a COL information item in sufficient detail to support the NRC licensing finding and includes the requirements for updating the affected document (e.g., the FSAR update process). Otherwise, inform the NRC staff of the final disposition of the COL information item. The descriptions provided should include implementation schedules to allow the coordination of activities with the NRC construction inspection program."

GGNS Unit 3 FSAR Section 14.2.9 of the COLA, "Site-Specific Preoperational and Startup Tests," includes a plant specific COL item identified as GGNS COL Item 14.2-4-H which describes the site specific pre-operational and initial startup tests not addressed in DCD Section 14.2.8. GGNS Unit 3 FSAR Section 14.2.9, states, in part, "Site-specific preoperational and startup tests are in accordance with the system specifications and associated equipment specifications. The tests demonstrate that the installed equipment and systems perform within the limits of these specifications."

To ensure that test procedures are in accordance with established methods and appropriate acceptance criteria, the COL licensee should make available to the NRC 60 days prior to intended use the test specifications that describe the types and sources of design performance requirements and acceptance criteria used to develop detailed test procedures for testing plant SSCs. Discuss your plans for a commitment in FSAR Section 14.2.9 for plant specific COL item, GGNS COL item 14.2-4-H, to make available the test specifications for NRC inspection or justify your basis for not including this commitment.