

November 4, 2008

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 20 RELATED TO
THE SRP SECTION 14.03.10 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 301-415-5787 or by e-mail at rocky.foster@nrc.gov.

Sincerely,

/RA/

Rocky D. Foster, Project Manager
ESBWR/ABWR Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 052-0024

eRAI Tracking No. 1123

Enclosure:
Request for Additional Information

November 4, 2008

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 20 RELATED TO
THE SRP SECTION 14.03.10 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 301-415-5787 or by e-mail at rocky.foster@nrc.gov.

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Rocky D. Foster, Project Manager
ESBWR/ABWR Projects Branch 1
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Office of New Reactors

Docket Nos. 052-0024

eRAI Tracking No. 1123

Enclosure:

Request for Additional Information

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JCruz

MLesser, RII

MTonacci, NRO

AJohnson, NRO

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RSchmitt, NSIR

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RidsNroDsraSbpb

RidsNroDnrlNge2

ADAMS Accession No. ML083080563

NRO-002

OFFICE	NSIR/LIB/TR	NSIR/LIB /BC	NGE1/PM	OGC	NGE2/L-PM
NAME	RSchmitt	KWilliams	RFoster	SBrock	MTonacci
DATE	09/22/08	10/03/08	10/07/08	10/14/08	11/04/08

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information
Grand Gulf, Unit 3 COLA
Entergy Operations, Inc.
Docket No. 52-024

SRP Section: 14.03.10 - Emergency Planning - Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: COLA Part 5

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB (EP))

14.03.10-1

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- A. Part 10, COL application, ITAAC Table 2.3-1, "ITAAC for Emergency Planning," does not include an ITAAC relating to the submission of detailed implementing procedures for the emergency plan no less than 180 days prior to fuel load. Such an ITAAC is identified under Planning Standard 17.0, "Implementing Procedures," in Table C.II.1-B1 of Regulatory Guide (RG) 1.206, issued June 20, 2007. Section II.P.7, "Implementing Procedures," of the Emergency Plan (Part 5) states that "Appendix 5 of this plan provides a topical listing of EPPs that support this plan." Appendix 5, "Emergency Plan Procedures–Topical List," provides a one-page list of various topics and activities that will be addressed in emergency plan implementing procedures and supporting procedures. Revise ITAAC Table 2.3-1 to include an ITAAC relating to the submission of detailed implementing procedures, consistent with RG 1.206 or justify an alternative approach.

14.03.10-2

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- B. Part 10, COL application In Table 2.3-1, "ITAAC For Emergency Planning," acceptance criterion 6.3 ends with the words "for various radiological conditions." Consistent with RG 1.206, and the corresponding EP program element in Table 2.3-1, the correct acceptance criterion wording should be "for various meteorological conditions." Please clarify.

14.03.10-3

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- C. Part 10, COL application In Table 2.3-1, "ITAAC For Emergency Planning," each acceptance criterion is prefaced with the phrase "A report exists that confirms . . ." The goal of ITAAC 'acceptance criteria' is to be objective criteria that can be demonstrated to have been 'met' prior to fuel load. The acceptance criteria must be specific and sufficiently objective, in order to clearly identify what the requirements are, and to provide the ability to determine whether they have been met. In RIS 2008-05, "Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal" (February 27, 2008), the following guidance is provided in regard to the use of such a phrase:

If applicants use the phrase, “a report exists and concludes that . . .,” they should consider specifying the scope and the type of report. For example, they should explain whether the scope of the report includes the design, the as-built construction (as reconciled with the design), or any other information.

The use of the phrase “A report exists that confirms . . .” in the acceptance criteria is problematic, in that it is not clear how verification is actually conducted to confirm that the acceptance criteria are met. For example, acceptance criterion 5.1.1 states that “[a] report exists that confirms the TSC has at least 174 square meters (1875 square feet) of floor space.” Is the confirmation – that the acceptance criteria has been met – through visual examination of the TSC area, or only through a review of an unidentified paper “report” that says the TSC is of the designated size; without considering the nature, accuracy, and reliability of the report?

Consistent with RIS 2008-05, please explain the type and scope of the “report” cited in ITAAC Table 2.3-1, including how the report will serve to provide accurate and reliable confirmation that the acceptance criteria have been met for the as-built facility. An area that might be appropriate for using a report to confirm that various ITAAC have been met is planning standard 8.0, “Exercises and Drills” – for which an Exercise Report could serve to verify that various exercise-related ITAAC (e.g., exercise objectives) have been met.

In the alternative, provide a revised ITAAC table without the words “A report exists that confirms” for the acceptance criteria. The removal of the reference to unidentified future reports will provide for objective ITAAC acceptance criteria, and leave open the specific method(s) that the licensee will use to confirm that the ITAAC acceptance criteria have been met.

14.03.10-4

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

- D.1 Table C.II.1-B1 (generic ITAAC) acceptance criterion 14.1.3 addresses offsite exercise objectives associated with the full participation exercise. Explain why Table 2.3-1 does not include an acceptance criterion to reflect the offsite exercise objectives associated with the full participation exercise, and how this is consistent with the intent of this generic ITAAC. Either provide the appropriate acceptance criterion, or explain why it is not required.

14.03.10-5

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

D.2 Table 2.3-1 acceptance criteria 8.1.2.1 and 8.1.2.2 appear to address Table C.II.1-B1 acceptance criterion 14.1.2. Explain why 8.1.2.2 does not include the word "successfully" in regard to emergency response personnel performing their assigned responsibilities

14.03.10-6

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

D.3 Table C.II.1-B1 acceptance criterion 14.1.2 includes the bracketed statement that "[t]he COL applicant will identify responsibilities and associated acceptance criteria." Explain why Table 2.3-1 (acceptance criteria 8.1.2.1 and/or 8.1.2.2) does not identify any responsibilities and associated acceptance criteria, in relation to onsite emergency response personnel successfully performing their assigned responsibilities. Either provide the appropriate acceptance criterion, or explain why it is not required.

14.03.10-7

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

D.4 Table C.II.1-B1 acceptance criterion 14.1.1 includes the bracketed statement that "[t]he COL applicant will identify exercise objectives and associated acceptance criteria." Table 2.3-1 acceptance criterion 8.1.1.2 states that exercise objectives, including acceptance criteria, address each of the 8 listed emergency planning program elements. However, Table 2.3-1 does not identify (in the acceptance criteria) what the exercise objectives and associated acceptance criteria are (as called for in Table C.II.1-B1).

The goal of ITAAC acceptance criteria is to be objective criteria that can be demonstrated to have been 'met' prior to fuel load. The acceptance criteria must be specific and sufficiently objective, in order to clearly identify what the requirements are, and to provide the ability to determine whether they have been met. As written, the acceptance criterion 8.1.1.2 does not provide such clear and objective criteria. For the full participation exercise acceptance criteria in Table 2.3-1, provide specific exercise objectives and associated acceptance criteria, consistent with Table C.II.1-B1. Either provide the appropriate acceptance criterion, or explain why it is not required.

14.03.10-8

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- E. COL application Table 2.3-1, "ITAAC for Emergency Planning," addresses the emergency classification system in ITAAC 1.1, but does not reflect the completion of a fully developed set of EALs that are consistent with Section IV.B of Appendix E to 10 CFR Part 50; including reflecting the current status of NEI 07-01. Revise ITAAC 1.1 to reflect the requirements for a standard emergency classification and action level scheme, with clear and objective acceptance criteria. An example of such an ITAAC, that would address the ongoing endorsement of NEI 07-01 by the NRC, is as follows:

Inspections, Tests, Analyses: An analysis of the EAL technical bases will be performed to verify as-built, site-specific implementation of the EAL scheme.

Acceptance Criteria: The EAL scheme is developed consistent with Regulatory Guide 1.101, *Emergency Planning and Preparedness for Nuclear Power Reactors*.