



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 18, 2008

Vice President, Operations  
Entergy Operations, Inc.  
Grand Gulf Nuclear Station  
P.O. Box 756  
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 – REQUEST FOR ADDITIONAL  
INFORMATION RELATED TO PROPOSED EMERGENCY PLAN CHANGE  
(TAC NO. MD8669)

Dear Sir or Madam:

By letter dated April 28, 2008 (non-public), to the U.S. Nuclear Regulatory Commission (NRC), Entergy Operations, Inc., submitted a request for changes to the Emergency Plan for Grand Gulf Nuclear Station, Unit 1. The request was to allow the Repair and Corrective Action on-shift Electrical, Mechanical, and Instrumentation and Controls Maintenance functions to be performed by shift personnel assigned other duties.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete its review. The specific information requested is addressed in the enclosure to this letter and was discussed with Mr. M. Larson, et al., of your staff on December 11, 2008. Please provide a response by February 20, 2009, to this request for additional information.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at 301-415-2296 or via e-mail at [fred.lyon@nrc.gov](mailto:fred.lyon@nrc.gov).

Sincerely,

A handwritten signature in cursive script that reads "CF Lyon".

Carl. F. Lyon, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION (RAI)

ENTERGY OPERATIONS, INC.

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

By letter dated April 28, 2008 (non-public), Entergy Operations, Inc., submitted a request for changes to the Emergency Plan (EP) for Grand Gulf Nuclear Station, Unit 1. The NRC staff has determined that the following additional information is required in order to complete its evaluation.

RAI #	SECTION	Question
1	1.0/2.0	<p>C1 Proposal states, "These attachments can also be performed by Operations personnel specifically training to perform these functions."</p> <p>C1 Repair and Corrective Actions states, "These tasks will be performed by task trained non-licensed and licensed operators."</p> <p>C1 Conclusion states, "This change is acceptable since the tasks performed by the Mechanical and Electrical maintenance personnel can be performed by Operations personnel who will be trained and qualified to perform the tasks."</p> <p>C2 Justification for Change states, "These attachments will not require any I&amp;C [Instrumentation and Controls] maintenance personnel since specifically trained Operations personnel will perform these functions."</p> <p>C2 Conclusion states, "This change is acceptable since the tasks performed by the I&amp;C maintenance personnel can be performed by Operations personnel who will be trained and qualified to perform the tasks."</p> <p>2.0 Basis for Effectiveness of Change states, "For the Repair and Corrective Action Function, there was no loss in effectiveness since on-shift Operations personnel can perform these tasks with additional training on performance of proceduralized tasks in Emergency Procedure 05-S-01-EP-1."</p> <ol style="list-style-type: none"><li>1. Provide copies of training/plant documents that provide this "specific training" to the Operations personnel including lesson plans, any procedures that specifically require this training, any procedures that specifically require requalification training, and any associated job performance measures.</li><li>2. By what commitment would this training be completed prior to implementing these changes in shift staffing and what commitment would be made to continue this training?</li><li>3. Provide current revisions of 05-S-01-EP-1, Emergency/Severe Accident Procedure Support Document and 01-S-10.6, Emergency Response Organization (ERO).</li></ol>

Enclosure

RAI #	SECTION	Question
2	4.0	<p>Table 4-1 shows Current Operator Shift Staffing with a minimum of 12 Operators on shift "A." Table 5-1 lists 9 Operators committed for on-shift staffing.</p> <ol style="list-style-type: none"> <li data-bbox="492 463 1462 555">1. Explain what role/function these committed on-shift staff would have for Operations, ERO/EP and Fire Brigade. Please supply this information in a structured (e.g., tabular) format.               <ol style="list-style-type: none"> <li data-bbox="558 591 1462 810">a. Explain what role/function these committed on-shift staff would need to take during an event that would entail the following: responding to an event that would require simultaneous Operations, ERO/EP, and Fire Brigade support, performing Dose assessment, Emergency Classifications, and resultant notifications to State and local response organizations, and the NRC.</li> </ol> </li> <li data-bbox="492 853 1462 974">2. Section 2.0 states that "overstaffing (See Section 4.0 for shift staffing numbers)...provide assurance that these functions can be performed at all times." How does the shift staffing provided in Table 5-1 provide this assurance?</li> </ol>
3	4.0	<p>Section 4.0 states, "As indicated by the numbers shown in Table 4-1 and 4-2, shift staffing is higher than our committed on-shift staffing numbers as indicated in the Grand Gulf Technical Requirements manual and Technical Specifications. Overstaffing of shift personnel beyond NUREG 0654, Table B-1 requirements provides assurance that all of the functions listed in the proposed Table 5-1 will be performed as required by the Emergency Plan and ensures 10CFR50.47 compliance."</p> <ol style="list-style-type: none"> <li data-bbox="492 1251 1462 1372">1. How does the shift staffing listed in Table 5-1 provide assurance that all of the functions listed in the proposed Table 5-1 will be performed as required by the Emergency Plan and ensure compliance with 10 CFR 50.47?</li> <li data-bbox="492 1415 1462 1538">2. How are the staffing levels listed in Table 4-1 maintained to provide future assurance that all of the functions listed in the proposed Table 5-1 will be performed as required by the Emergency Plan and ensure compliance with 10 CFR 50.47?</li> </ol>

RAI #	SECTION	Question
4	GENERAL	<p>Pursuant to the prior submittal and approval of the Grand Gulf Emergency Plan in September 2000, in correspondence GNRO-2000/00021, letter dated April 6, 2000 (non-public), Page 3 of 11, Paragraph 1, the licensee stated, in part, "To offset any potential decrease in emergency capability associated with the increased augmentation and facility fully operational times, specific on-shift staffing or capabilities...will be increased. Specifically the following Table 5-1 Emergency Tasks and Emergency Plan changes support this increase in times:</p> <p>...[Bullet 3] – Committing to increase the on-shift I&amp;C staffing from zero to one;</p> <p>...[Bullet 4] – Deleting footnote denoting mechanical and electrical maintenance as a shared function thus increasing onshift staffing in these areas by one each."</p> <p>In addition, in correspondence GNRO-2000/00021, letter dated April 6, 2000, Page 6 of 11, Paragraph 1, the licensee stated, in part, "This overstaffing of operations shift personnel along with other onshift ERO personnel (chemistry, maintenance, and radiation protection) provides assurance that all of the functions listed in the proposed Table 5-1 will be performed as required by the Emergency Plan. This ability to perform all required emergency functions at all times offsets any delays such as the 75 minute augmentation time of TSC [Technical Support Center] personnel and the 90 minute facility fully operational time."</p> <ol style="list-style-type: none"><li>1. The requested reduction in the Repair and Corrective Action function, Electrical, Mechanical, and I&amp;C Maintenance on-shift staffing, proposed in Table B-1, eliminates prior commitments made by the licensee, that were used to justify previously NRC approved Emergency Plan changes in September 2000. Explain in detail what specific criteria, changes, or improvements have been made from that timeframe to current, which justify eliminating the basis for the NRC approval of the previous Emergency Plan changes.</li></ol>

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Sincerely,  
/RA/

Carl. F. Lyon, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-416

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As stated

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