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G3NO-2008-00028

December 16, 2008

U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Document Control Desk

DOCKET: No. 52-024

SUBJECT: Responses to NRC Requests for Additional Information, Letter No. 23
(GG3 COLA)

REFERENCE: NRC Letter to Entergy Nuclear, *Request for Additional Information
Letter No. 23 Related to the SRP Section 13.1.1 for the Grand Gulf
Combined License Application*, dated November 24, 2008 (ADAMS
Accession No. ML083260633).

Dear Sir or Madam:

In the referenced letter, the NRC requested additional information on two items to support the review of certain portions of the Grand Gulf Unit 3 Combined License Application (GG3 COLA). The responses to the following Requests for Additional Information (RAIs) in the referenced letter are provided in Attachments 1 and 2 to this letter as follows:

1. RAI Question 13.01.01-1, Management interfaces with NSSS and AE organizations
2. RAI Question 13.01.01-2, Proportion of time assigned to other activities

Should you have any questions, please contact me or Mr. Tom Williamson of my staff. Mr. Williamson may be reached as follows:

Telephone: (601) 368-5786

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Mail Stop M-ECH-21
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E-Mail Address: twilli2@entergy.com

This letter contains no new commitments.

DOB8
URO

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 16, 2008.

Sincerely,



WKH/ghd

- Attachments:
1. Response to RAI Question No. 13.01.01-1
 2. Response to RAI Question No. 13.01.01-2

cc (email unless otherwise specified):

NRC

NRC Project Manager – Grand Gulf Unit 3 COLA
NRC Project Manager – North Anna Unit 3 COLA
NRC Director – Division of Construction Projects (Region II)
NRC Regional Administrator - Region IV
NRC Resident Inspectors' Office - GGNS

Ms. B. Abeywickrama
Ms. T. Dozier
Mr. R. Foster
Mr. J. Hales
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Entergy

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Mr. W. H. Hammett (M-ELEC)
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Mr. J. Hegner (Dominion)
Mr. B. R. Johnson (GE-Hitachi)
Mr. P. Smith (DTE)

ATTACHMENT 1

G3NO-2008-00028

RESPONSE TO NRC RAI LETTER NO. 23

RAI QUESTION NO. 13.01.01-1

RAI QUESTION NO. 13.01.01-1

NRC RAI 13.01.01-1

SRP 13.1.1 I.1.B.viii requests, as part of the management organization for the initial test program, a description of how applicant's management interfaces with the NSSS and AE organizations. The applicant is requested to provide this information in the application.

Entergy Response

FSAR Appendices 13AA and 14AA¹ illustrate and/or describe how GGNS Unit 3 management interfaces with the reactor vendor/constructor staff for design, construction, and preoperational/startup activities.

FSAR Figure 13AA-201² illustrates the relationship between the GGNS utility construction management and the reactor vendor/constructor organization. As indicated in Figure 13AA-201 the reactor vendor site director reports to the GGNS Unit 3 site executive.

FSAR Figure 14AA-201 illustrates the preoperational and startup testing organization, including the reporting relationship of the reactor vendor [i.e., General Electric-Hitachi (GEH)] resident site manager to GGNS Unit 3 management.

The following FSAR subsections describe aspects of the interface between GGNS Unit 3 management and the reactor vendor/constructor organizations for design, construction, and preoperational activities:

- Design - FSAR Subsection 13AA.1.3 describes design-related interfaces between the reactor vendor and plant staff. Specifically, Subsection 13AA.1.3 describes how design issues and design changes that arise during construction are communicated by the reactor vendor to the manager in charge of engineering and how design control is transferred to plant staff after test completion.
- Construction - FSAR Subsection 13AA.1.8² describes how the reactor vendor site director and the constructor site manager are accountable to the site executive and addresses monitoring and review of contractor performance by utility construction staff.

¹ The addition of Appendix 14AA to the FSAR is addressed in Enclosure 5 of Dominion letter to NRC, *RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER 012*, dated August 7, 2008 (ML082240413), in response to question 14.02-3 as amended by the response to question 14.02-7 of Dominion letter, *RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER NOS. 011, 013, AND 021 (FSAR CHAPTERS 1,5,13,14 AND 17)* dated September 11, 2008 (ML082610417). The Dominion responses noted above are adopted by GGNS Unit 3 as discussed in Entergy letter to NRC, *Evaluation of North Anna Unit 3 (R-COLA) Responses to NRC Requests for Additional Information (RAIs) (GG3 COLA)*, dated October 8, 2008 (ML082900171).

² Figure 13AA-201 and Section 13AA.1.8 revised in response to GGNS RAI 17.5-2, *Responses to NRC Requests for Additional Information, Letter No. 5 (GG3 COLA)*, dated October 20, 2008 (ML083120082)..

- Preoperational and startup testing – The position descriptions and responsibilities provided in FSAR Subsection 14AA.2.2 include interface-related responsibilities for startup group management personnel. Additionally, DCD Section 14.2.1.4, which is incorporated by reference, includes discussion of “Interrelationships and Interfaces” achieved through the Startup Controlling Group (titled as the Joint Test Group in FSAR Section 14AA.2.2.8).

In addition to the figures and descriptions discussed above, interface requirements between GGNS Unit 3 management and the reactor vendor/constructor staff will be described by station procedures as discussed in FSAR Section 13AA.2.2.

Proposed COLA Revision

None

ATTACHMENT 2

G3NO-2008-00028

RESPONSE TO NRC RAI LETTER NO. 23

RAI QUESTION NO. 13.01.01-2

RAI QUESTION NO. 13.01.01-2

NRC RAI 13.01.01-2

SRP 13.1.1 I.1.B.xi requests, as part of the management organization for the initial test program, for the identified positions or classes of positions that have functional responsibilities other than for the COL application, the expected proportion of time assigned to the other activities. The applicant is requested to provide this information in the application.

Entergy Response

FSAR Chapter 13, Appendix 13AA, Figure 13AA-201¹ illustrates the construction management organization and includes identified positions that have functional responsibilities for design, construction, or preoperational/startup testing of GGNS Unit 3. The managers, functional managers, and personnel that report to them would perform their duties specific to GGNS Unit 3. No functional responsibilities other than for the COL application have been identified for these personnel.

Proposed COLA Revision

None

¹ Figure 13AA-201 was revised in response to GGNS RAI 17.5-2 of GGNS RAI Letter No. 5. See Entergy letter to NRC, *Responses to NRC Requests for Additional Information, Letter No. 5 (GG3 COLA)*, dated October 20, 2008 (ML083120082).