

December 22, 2008

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 30 RELATED TO  
SRP SECTION 13.03 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 301-415-2890 or by e-mail at [Andrea.Johnson@nrc.gov](mailto:Andrea.Johnson@nrc.gov).

Sincerely,  
**/RA/**

Andrea M. Johnson, Project Manager  
ESBWR/ABWR Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket No. 052-0024  
Enclosure:  
Request for Additional Information

December 22, 2008

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

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SRP SECTION 13.03 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.

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Sincerely,  
**/RA/**  
Andrea M. Johnson, Project Manager  
ESBWR/ABWR Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket No. 052-0024  
Enclosure:  
Request for Additional Information  
Distribution:  
PUBLIC  
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NRO-002

OFFICE	NSIR/DPR/LIB /TR	NSIR/DPR/LIB BC	NGE1/PM	OGC	NGE1/L-PM
NAME	RSchmitt	KWilliams	AJohnson	MCarpentier	AJohnson
DATE	11/10/08	11/14/08	11/17/08	11/24/08	12/18/08

\*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: 13.03 - Emergency Planning  
Application Section: 13.3

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

13.03-72

**SITE- 12A/12D: Emergency Classification System**

Regulatory Basis: 10 CFR 52.79(a)(21); 10 CFR 50.47(b)(4); Sections IV.B. and C. of Appendix E to 10 CFR Part 50;

SRP ACCEPTANCE CRITERIA: Requirement 2; Acceptance Criterion 3

**Emergency Action Levels (EALs) are discussed in Section D, "Emergency Classification System," of COL application Part 5.**

The initial EALs, which are required by 10 CFR 50.47(b)(4) and Section IV.B of Appendix E to 10 CFR Part 50, must be approved by the NRC. The Grand Gulf COL application does not fully address certain aspects of the required EAL scheme. This is because various equipment set points and other information cannot be determined until the as-built information is available; e.g., head corrections, radiation shine, final technical specifications, and equipment calculations and tolerances. The NRC has identified the following two possible options to ensure applicants address the regulations:

Option 1 – Submit an entire EAL scheme, which contains all site-specific information, including set points. Until this information is finalized, EALs would remain an open item.

Option 2 – Submit emergency plan Section D, "Emergency Classification System," which addresses the four critical elements of an EAL scheme (listed below). The NRC will determine the acceptability of the EAL scheme.

- *Critical Element 1* – Applicant proposes an overview of its emergency action level scheme including defining the four emergency classification levels, (i.e., Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency), as stated in NEI 99-01, Revision 5, with a general list of licensee actions at each emergency classification level.
- *Critical Element 2* – Applicant proposes to develop the remainder of its EAL scheme by using a specified NRC endorsed guidance document. In the development of its EALs, the proposed EALs should be developed with few or no deviations or differences, other than those attributable to the specific reactor design. NEI 07-01, if endorsed, will be applicable to the AP1000 and ESBWR (passive) reactor designs, and NEI 99-01 is applicable to all (non-passive) reactor designs. If applicable, EALs related to digital instrumentation and control must be included. The NRC must find in the Safety Evaluation Report that this approach is acceptable for each site.

Enclosure

*Critical Element 3* – Applicant proposes a License Condition (LC) that the applicant will create a fully developed set of EALs in accordance with the specified guidance document. These fully developed EALs must be submitted to the NRC for confirmation at least 180 days prior to fuel load.

*Critical Element 4* – The EALs must be kept in a document controlled by 10 CFR 50.54(q), such as the emergency plan; or a lower tier document, such as the Emergency Plan Implementing Procedures.

Please review the two options provided above, identify which option will be chosen, and provide the detailed EAL information in support of the chosen option.

Please inform the NRC which option you intend to pursue within two-weeks of receipt of this RAI.

13.03-73

#### **SITE-17: Medical and Public Health Support**

Basis: 10 CFR 52.79(a)(21); 10 CFR 50.47(b)(8) and (12); Section IV.E of Appendix E to 10 CFR Part 50; NUREG-0654/FEMA-REP-1, Evaluation Criterion L.1

SRP ACCEPTANCE CRITERIA: Requirement A; Acceptance Criterion 1

Section II.L.1, “Medical and Public Health Support,” states that EOI has established agreements with Claiborne County Hospital (primary provider), located in Port Gibson, MS, and River Region Medical Center (back-up provider), located in Vicksburg, MS, under which these facilities provide medical services for injured personnel from GGNS 3. Discuss the capabilities of these facilities to evaluate uptakes of radioactive materials by contaminated/injured personnel.

13.03-74

#### **SITE-15: Emergency Response Support Resources**

Basis: 10 CFR 50.47(b)(3); Planning Standard C; NUREG-0654/FEMA-REP-1; Evaluation Criterion C.1.a; Evaluation Criterion C.1.b

SRP ACCEPTANCE CRITERIA: Requirement A; Acceptance Criteria 1 and 18

Section II.C.1, “Federal Response Capability,” describes how under some complex circumstances it may be necessary to obtain off-site radiological monitoring support from federal government agencies. One of those may be the Federal Radiological Monitoring and Assessment Center (FRMAC). Section II.A.1.b, “Concept of Operations, Federal Government Emergency Response,” (page II-7) states that the emergency response roles of various federal agencies are established in the National Response Plan, rather than the National Response Framework (NRF) which has now been implemented. Revise GGNS Emergency Plan to reference the National Response Framework.