Entergy

Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775

January 21, 2009

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: License Amendment Request 2009-01
Application for Technical Specifications (TS) Change to Adopt NRC Approved Generic Changes TSTF-163, TSTF-222, TSTF-230, and TSTF-306 to the Improved Technical Specifications
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

File No.: G9.5

RBF1-09-0009
RBG-46763

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for River Bend Station (RBS). The proposed amendment adopts selected improvements agreed upon between the Nuclear Energy Institute (NEI) Technical Specification Task Force (TSTF) and the NRC, subsequent to the conversion of the RBS Technical Specifications to the Improved Standard Technical Specifications. In addition, two minor administrative corrections are included.

Attachment 1 provides a summary of the overall package. Attachments 2 and 3 provide the annotated Technical Specification pages for the minor administrative changes. Attachments 4 through 7 provide a description of the proposed changes for each TSTF item, a justification, and the annotated Technical Specification pages. Attachments 4 through 7 also provide annotated Bases pages for each TSTF item for information, since the Bases are not a formal part of the Technical Specifications.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that the changes involve no significant hazards considerations. Attachment 8 provides the Significant Hazards Consideration for the change considered less restrictive. Attachment 9 provides the Significant Hazards Consideration for the changes considered administrative.

The proposed changes include one new commitment, as listed in Attachment 10.

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NRR

Entergy requests approval of the proposed amendment by January 21, 2010. Once approved, the amendment shall be implemented within 60 days. Although this request is neither exigent nor emergency, your prompt review is requested.

If you have any questions or require additional information, please contact Danny Williamson at 225-381-4279.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 21, 2009.

Sincerely,

Jerry C. Roberts
Director, Nuclear Safety Assurance
River Bend Station, Unit 1

Attachments:
1. Description of Changes, Regulatory Analysis, and Environmental Considerations
2. Administrative change to TS 5.5.7, Ventilation Filter Testing Program (markup)
3. Administrative change to TS 3.7.2, Control Room Fresh Air System (markup)
4. TSTF-163 Analysis and Technical Specification Changes (markup)
5. TSTF-222 Analysis and Technical Specification Changes (markup)
6. TSTF-230 Analysis and Technical Specification Changes (markup)
7. TSTF-306 Analysis and Technical Specification Changes (markup)
8. Significant Hazards Consideration for Less Restrictive Changes
9. Significant Hazards Consideration for Administrative Changes
10. List of Regulatory Commitments

cc: U. S. Nuclear Regulatory Commission
Region IV
612 East Lamar Blvd., Suite 400
Arlington, TX 76011-4125

NRC Senior Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

U.S. Nuclear Regulatory Commission
Attn: Mr. Carl F. Lyon
Washington, DC 20555-0001

Mr. Jeffrey P. Meyers
Louisiana Department of Environmental Quality
Attn: OEC-ERSD
P. O. Box 4312
Baton Rouge, LA 70821-4312

Attachment 1

RBG-46763

Description of Proposed Technical Specification Changes

1.0 DESCRIPTION

The current RBS TS was based upon the BWR/6 Improved Standard Technical Specifications (ISTS), NUREG-1434, Revision 0, published September 1992. RBS converted to the ISTS by Amendment 81, dated July 20, 1995. The proposed changes listed in the following section are changes to the ISTS that the Nuclear Regulatory Commission (NRC) has approved through the TSTF process developed by the industry and the NRC. The latest approved revisions of the TSTFs were used for the requested changes.

Although generically approved by the NRC, these TSTFs have not been prepared and noticed using the Consolidated Line Item Improvement Process (CLIIP) described in NRC Regulatory Issue Summary 2000-06, "Consolidated Line Item Improvement Process for Adopting Standard Technical Specifications Changes for Power Reactors." However, Nuclear Reactor Regulation (NRR) Office Instruction LIC-101, Rev. 3, "License Amendment Review Procedures," addresses the NRC review process for a license amendment request involving a TSTF that does not use the CLIIP. LIC-101 states:

> Some generic changes approved through the TSTF process have not been prepared and noticed as available for adoption using the CLIIP. Most of these changes were approved before the CLIIP was developed. In order to gain the efficiencies envisioned for the TSTF process, work planning associated with plant-specific adoption of TSTF changes not processed using CLIIP should focus on the TS Section in DIPM/IROB (i.e., reviews and concurrences from the TS Section will usually suffice since the needed technical agreement was reached during the TSTF review). The TS Section will determine if there is a need for additional technical support for a particular plant-specific request for an approved TSTF.

Entergy previously requested approval to incorporate generically approved TSTFs into the Grand Gulf Nuclear Station (GGNS) Technical Specifications (TS) by letters dated August 20, 1999, and March 30, 2005.

2.0 PROPOSED CHANGES

Attachment 2 describes a proposed change to Technical Specification Section 5.5.7. That section currently contains references to a document, ANSI N510-1989, which is now designated ASME N510-1989. Because both designations refer to the same document, this change represents a minor editorial update.

Attachment 3 describes a proposed administrative change to CONDITION F of Technical Specification 3.7.2. This CONDITION was recently changed in Amendment 154, which implemented TSTF-448. In the application for that amendment, the word "or" was inadvertently omitted from the markup for the proposed change. That word appeared in the standard markup contained in the TSTF. The change described in Attachment 3 is proposed in order to correct that error.

Markups of the specific affected Technical Specification pages for these changes are included at the end of the respective attachments.

Attachments 4-7 provide RBS-specific versions of the NRC-approved generic changes that are being requested at this time. For each of the requested changes, the following is provided:

- the associated TSTF number and its short title,
- the specific changes requested to the RBS Technical Specifications,
- a comparison between the requested change and the TSTF,
- the justification for the change (based upon the justification for the TSTF, with plant specific information added as needed),
- a markup of the specific affected Technical Specification pages,
- a markup of the specific affected Bases pages, for information, since the Bases are not a formal part of the Technical Specifications. Entergy will implement the TS Bases changes in accordance with the RBS Bases Control Program, TS 5.5.11.

The following is a tabulation of the specific information on the attachments to this letter:

Att.	TSTF No.	Description	LCO/SR Affected	TS Pages	Type of Change
2	N/A	Change reference designation from ANSI to ASME.	TS 5.5.7	5.0-11 5.0-12	Administrative
3	N/A	Correction to CONDITION F added by Amendment 154.	TS 3.7.2	3.7-7	Administrative
4	163 R2	Minimum vs. steady state voltage & frequency	SR 3.8.1.7 SR 3.8.1.12 SR 3.8.1.15 SR 3.8.1.20	3.8-7 3.8-10 3.8-12 3.8-15	Administrative
5	222 R1	Control Rod Scram Time Testing	SR 3.1.4.1 SR 3.1.4.4	3.1-12 3.1-13	Administrative
6	230 R1	Add new CONDITION B to LCO, RHR suppression pool cooling to allow 2 trains to be OOS for 8 hours	LCO 3.6.2.3	3.6-37	Less Restrictive
7	306 R2	Add Action to LCO to give option to isolate the penetration. (BWR)	LCO 3.3.6.1	3.3-48	Administrative

Attachment 8 provides the Significant Hazards Consideration for the change considered less restrictive (TSTF-230). Attachment 9 provides the Significant Hazards Consideration for the changes considered administrative. (TSTF-163, -222, and -306, and the changes to TS 5.5.7 and TS 3.7.2)

In summary, Entergy proposes to change the River Bend Technical Specifications (TS) to incorporate four NRC approved TSTF Travelers that affect the BWR/6 ISTS. The NRC has determined that licensees may revise the TS to adopt current ISTS format and content provided that plant specific review supports a finding of continued adequate safety because: (1) the change is editorial, administrative or provides clarification (i.e., no requirements are materially altered), (2) the change is more restrictive than the licensee's current requirement, or (3) the change is less restrictive than licensee's current requirement, but nonetheless still affords adequate assurance of safety when judged against regulatory standards.

TSTF-163, TSTF–222, and TSTF-306 are considered administrative changes because the proposed modification of the TS wording does not materially alter the original intent of the current requirements. TSTF-230 modifies certain Technical Specification Requirements to be less restrictive. However, these less restrictive requirements still afford adequate assurance of safety when judged against regulatory standards.

3.0 REGULATORY ANALYSIS

Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met.

Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and do not affect conformance with any General Design Criterion (GDC) differently than described in the Updated Final Safety Analysis Report (UFSAR).

10 CFR 50.36 (C)(3) requires the TS to include Surveillance Requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. The RBS TS Surveillance Requirements will continue to provide this assurance with the proposed adoption of the NRC approved TSTF changes.

4.0 ENVIRONMENTAL CONSIDERATIONS

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Attachment 2
RBG-46763

Administrative change to TS 5.5.7, Ventilation Filter Testing Program

Description of requested change:

Subsections "a", "b", and "d" of RBS Technical Specification 5.5.7, Ventilation Filter Testing Program, contain references to ANSI N510-1989, "Testing of Nuclear Air Treatment Systems." That document number is now obsolete, having been changed to ASME N510-1989. No changes were made to the requirements contained in the document when its number was changed.

License Amendment No. 159 to the RBS Operating License was approved by NRC on February 28, 2008. One of the changes made in that amendment was to correct the same document number change described above in subsection "e" of TS 5.5.7. The change being requested herein will correct the other references to that document.

The significant hazards consideration evaluation of this change is discussed in Attachment 9.

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and pressure Vessel Code shall be construed to supersede the requirements of any TS.

5.5.7 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ~~ANSI~~ ASME N510-1989 at the system flowrate specified below ± 10%:

ESF Ventilation System	Flowrate
SGTS	12,500 cfm
FBVS	10,000 cfm
CRFAS	4,000 cfm

(continued)

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ~~ANSI~~ ASME N510-1989 at the system flowrate specified below ± 10%:

ESF Ventilation System	Flowrate
SGTS	12,500 cfm
FBVS	10,000 cfm
CRFAS	4,000 cfm

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and the relative humidity specified below:

ESF Ventilation System	Penetration	RH
SGTS	5.0%	70%
FBVS	0.5%	70%
CRFAS	1.0%	70%

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ~~ANSI~~ ASME N510-1989 at the system flowrate specified below ± 10%:

ESF Ventilation System	Delta P	Flowrate
SGTS	< 8" WG	12,500 cfm
FBVS	< 8" WG	10,000 cfm
CRFAS	< 8" WG	4,000 cfm

(continued)

Attachment 3
RBG-46763

Administrative change to TS 3.7.2, Control Room Fresh Air System

Description of requested change:

During the implementation of License Amendment No. 154 in December 2007, it was noted that an error had been made in the development of the original RBS application, in that the word "or" had been inadvertently omitted from the markup for CONDITION F of Limiting Condition for Operation 3.7.2. That change was part of TSTF-448, which had been issued in connection with Generic Letter 2003-01 on the main control room habitability program. The amendment application was approved as written, resulting in an inconsistency between the RBS Technical Specifications and the standard BWR-6 Technical Specifications regarding that section.

The requested change will correct this error by adding the word "or" in its intended location in CONDITION F, as indicated on the attached markup. The significant hazards consideration evaluation of this change is discussed in Attachment 9.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Two CRFA subsystems inoperable during movement of recently irradiated fuel assemblies in the primary containment or fuel building, or during OPDRVs.	F.1 Suspend movement of recently irradiated fuel assemblies in the primary containment and fuel building.	Immediately
	AND	
OR	F.2 Initiate action to suspend OPDRVs.	Immediately
One or more CRFA subsystems inoperable due to inoperable CRE boundary during movement of recently irradiated fuel assemblies in the primary containment or fuel building during OPDRVs. OR		

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.2.1	Operate each CRFA subsystem for ≥ 10 continuous hours with the heaters operating.	31 days
SR 3.7.2.2	Perform required CRFA filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.2.3	Verify each CRFA subsystem actuates on an actual or simulated initiation signal.	18 months

(continued)

Attachment 4

RBG-46763

TSTF-163 - Minimum vs. Steady State Voltage & Frequency

a) Description of Requested Change

SR 3.8.1.7, 3.8.1.12, 3.8.1.15, and SR 3.8.1.20 are revised to remove the maximum voltage and frequency limits during the initial start transient condition and only require the Emergency Diesel Generator (DG) to achieve a voltage greater than or equal to 3740 V and a frequency greater than or equal to 58.8 Hz within 10 seconds for Division 1 and Division 2, and within 13 seconds for Division 3 DG. Subsequently, each DG (Division 1, 2 and 3) is required to achieve a steady state voltage of greater than or equal to 3740 V and less than or equal to 4580 V, and frequency greater than or equal to 58.8 Hz and less than or equal to 61.2 Hz. The proposed change is administrative in nature. It does not materially alter the original intent of the requirements.

TSTF-163 has previously been approved for incorporation in the TS for Grand Gulf Nuclear Station by a license amendment dated June 30, 2000, and the Perry Nuclear Power Plant by a license amendment dated April 30, 2007.

b) Comparison to TSTF

The RBS proposed changes are consistent with the TSTF.

c) Justification

Verifying that each DG achieves the minimum voltage and frequency within 10 seconds for Divisions 1 and 2, and 13 seconds for Division 3, is sufficient to verify each DGs capability to achieve a fast start and be ready to accept load as well as to satisfy the conditions needed for the DG output breaker to close. When a test is performed that does not result in tying the DG to the bus, a momentary voltage or frequency overshoot (and/or subsequent undershoot) can occur because no loads are being powered by the DG.

In a DG start in response to an actual loss of power event, the DG output breaker closes when frequency and voltage first achieve minimum permissive values. Subsequent loading tends to minimize the overshoot. With no loads applied, the overshoot or undershoot could be such that the voltage or frequency is momentarily outside the specified limit(s) at the time limit (10 or 13 seconds). This condition is not uncommon due to the nature of the DG governor as it seeks to control DG speed during that fast start when the DG is unloaded. The overshoot or undershoot condition does not affect the permissive for closure of the DG output breaker, since the permissive is dependent on minimum conditions being achieved, regardless of any overshoot or subsequent momentary undershoot. Thus, this condition is not indicative of an inoperable DG, provided that steady state voltage and frequency are subsequently achieved within the required time.

DG governor degradation is detectable, if the DG is not stable enough to satisfy the existing acceptance criteria or the DG will not provide rated voltage and frequency within the required time limit. Eliminating the time limit to reach steady state conditions from testing will not inhibit detection of governor or voltage regulator degradation.

The limits of the voltage and frequency tolerance specified in the current RBS Technical Specifications are more representative of steady state conditions than transient conditions. Modifying the limits of voltage and frequency to reflect steady state conditions is consistent with the recommendations in NRC Regulatory Guide 1.9, which allow a larger band for transient voltage and frequency deviations. The steady state frequency limits are not being changed. RBS will periodically monitor and trend the time it takes for each DG to reach steady state operation to identify degradation of governor and voltage regulator performance.

There is no effect on the DG capability to supply the minimum voltage and frequency within the required time or to achieve the steady state voltage and frequency assumed in the accident analysis. The proposed LAR does not invalidate either the assumptions or the conclusions of the associated design calculations. Therefore, eliminating the requirement for each DG to achieve a voltage and frequency within both minimum and maximum limits within the time limit has no impact on safety. In addition, the Loss Of Offsite Power (LOOP) and the LOOP in conjunction with an Emergency Core Cooling System (ECCS) initiation signal tests, required by RBS Technical Specification SR 3.8.1.11 and SR 3.8.1.19, will continue to verify the capability of the DGs to provide power at a voltage and frequency adequate to start and operate the safety loads.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.7	----------NOTE---------- All DG starts may be preceded by an engine prelube period. ----------	
	Verify each DG starts from standby conditions and achieves:	184 days
	a. For DG 1A and DG 1B, steady state voltage ≥ 3740 V and ≤ 4580 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz ~~in ≤ 10 seconds~~.	INSERT 1
	b. For DG 1C:	
	1. Maximum of 5400 V, and 66.75 Hz, and	INSERT 2
	2. Steady state voltage ≥ 3740 V and ≤ 4580 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz ~~in ≤ 13 seconds~~. (3)	
SR 3.8.1.8	----------NOTE---------- This Surveillance shall not be performed in MODE 1 or 2. However, credit may be taken for unplanned events that satisfy this SR. ----------	
	Verify manual transfer of unit power supply from the normal offsite circuit to required alternate offsite circuit.	18 months

(continued)

INSERT 1

:

1. In ≤ 10 seconds, voltage ≥ 3740 V and frequency ≥ 58.8 Hz; and
2.

INSERT 2

2. In ≤ 13 seconds, voltage ≥ 3740 V and frequency ≥ 58.8 Hz; and

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.12	----------NOTES---------- 1. All DG starts may be preceded by an engine prelube period. 2. This Surveillance shall not be performed in MODE 1 or 2. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR. ----------	
	Verify on an actual or simulated Emergency Core Cooling System (ECCS) initiation signal each DG auto-starts from standby condition and: a. For DG 1C during the auto-start maintains voltage ≤ 5400 V and frequency ≤ 66.75 Hz; b. In ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C after auto-start and during tests, achieves voltage ≥ 3740 V and ~~≤ 4580 V~~; c. ~~In ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C after auto-start and during tests, achieves frequency ≥ 58.8 Hz and ≤ 61.2 Hz; and~~ d. Operates for ≥ 5 minutes.	18 months frequency ≥ 58.8 Hz

(continued)

steady state voltage ≥ 3740 V and ≤ 4580 V and

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.15	----------NOTES---------- 1. This Surveillance shall be performed within 5 minutes of shutting down the DG after the DG has operated ≥ 1 hour loaded ≥ 3000 kW and ≤ 3100 kW for DG 1A and DG 1B, and ≥ 2500 kW and ≤ 2600 for DG 1C, or operating temperatures have stabilized, which ever is longer. Momentary transients outside of the load range do not invalidate this test. 2. All DG starts may be preceded by an engine prelube period. ---------- Verify each DG starts and achieves, in ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C, voltage ≥ 3740 V and ≤ 4580 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.	18 months INSERT 3
SR 3.8.1.16	----------NOTE---------- This Surveillance shall not be performed in MODE 1, 2, or 3. (Not applicable to DG 1C) However, credit may be taken for unplanned events that satisfy this SR. ---------- Verify each DG: a. Synchronizes with offsite power source while loaded with emergency loads upon a simulated restoration of offsite power; b. Transfers loads to offsite power source; and c. Returns to ready-to-load operation.	18 months

(continued)

INSERT 3

Verify each DG starts and achieves:

1. In ≤10 seconds for DG 1A and DG 1B and ≤13 seconds for DG 1C voltage ≥3740 V and frequency ≥58.8 Hz.
2. Steady state voltage ≥3740 V and ≤4580 V and frequency ≥58.8 Hz and ≤61.2 Hz.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.1.20	----------NOTE---------- All DG starts may be preceded by an engine prelube period. ----------	
	~~Verify, when started simultaneously from standby condition, each DG achieves, in ≤ 10 seconds for DG 1A and DG 1B and ≤ 13 seconds for DG 1C, voltage ≥ 3740 V and ≤ 4580 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.~~ ← INSERT 4	10 years

INSERT 4

Verify, when started simultaneously from standby condition, each DG achieves:

1. In ≤10 seconds for DG 1A and DG 1B and ≤13 seconds for DG 1C voltage ≥3740 V and frequency ≥58.8 Hz.
2. Steady state voltage ≥3740 V and ≤4580 V and frequency ≥58.8 Hz and ≤61.2 Hz.

FOR INFORMATION ONLY

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.2 and SR 3.8.1.7 (continued)

SR 3.8.1.7 requires that, at a 184 Frequency, the DG starts from standby conditions, achieves and maintains the required steady-state (i.e., after any overshoot) voltage and frequency within 10 seconds for DG 1A and DG 1B and 13 seconds for DG 1C. The start requirements for each DG support the assumptions in the design basis LOCA analysis (Ref. 5). The start requirements may not be applicable to 3.8.1.2 (see Note 3 of SR 3.8.1.2), when a modified start as described above is used. If a modified start is not used, the start requirements of SR 3.8.1.7 apply. Since SR 3.8.1.7 does require a 10 second start for DG 1A and DG 1B and 13 seconds for DG 1C, it is more restrictive than SR 3.8.1.2, and it may be performed in lieu of SR 3.8.1.2. This is the intent of Note 1 of SR 3.8.1.2. Similarly, the performance of SR 3.8.1.12 or SR 3.8.1.19 also satisfies the requirements of SR 3.8.1.2 and SR 3.8.1.7.

INSERT 5

The normal 31 day Frequency for SR 3.8.1.2 is consistent with the industry guidelines for assessment of diesel generator performance (Refs. 14 and 15). The 184 day Frequency for SR 3.8.1.7 is a reduction in cold testing consistent with Generic Letter 84-15 (Ref. 7). These Frequencies provide adequate assurance of DG OPERABILITY, while minimizing degradation resulting from testing.

SR 3.8.1.3

This Surveillance demonstrates that the DGs are capable of synchronizing and accepting the surveillance test load of 3,000 - 3,100 kW. These Technical Specification load values were selected in view of human engineering considerations that the smallest graduation on the watt meter is 100 kW. The minimum run time of 60 minutes is required to stabilize engine temperatures, while minimizing the time that the DG is connected to the offsite source.

Although no power factor requirements are established by this SR, the DG is normally operated at a power factor between 0.8 lagging and 1.0. The 0.8 value is the design rating of the machine, while 1.0 is an operational limitation to ensure circulating

(continued)

INSERT 5

In addition to the SR requirements, the time for the DG to reach steady state operation, unless the modified DG start method is employed, is periodically monitored and the trend evaluated to identify degradation of governor and voltage regulator performance.

Attachment 5

RBG-46763

TSTF-222 - Control Rod Scram Time Testing

a) Description of Requested Change

SR 3.1.4.1 and SR 3.1.4.4 are revised to clarify that post-refueling control rod scram time testing only applies to control rods affected by movement of fuel. The proposed change is administrative in nature. It does not materially alter the original intent of the requirements.

TSTF-222 has previously been approved for incorporation in the TS for Brunswick, Units 1 and 2, by license amendments dated March 19, 2002, and the Grand Gulf Nuclear Station by a license amendment dated February 1, 2006.

b) Comparison to TSTF

The RBS proposed changes are consistent with the TSTF.

c) Justification

The current words of SR 3.1.4.1 require each control rod to be tested if any fuel movement in the reactor pressure vessel occurs. A literal interpretation of the SR might conclude that even if only one bundle in the reactor core is moved (e.g., replacing a leaking fuel bundle mid-cycle), all of the control rods in the reactor core are required to be tested. This is not the intent of this requirement. However, confusion is introduced by the fact that this SR does not specify "affected" control rods as some other SRs do. A generic change to the ISTS (NUREG - 1434) Bases previously attempted to clarify that the intent of the SR was for only those rods within the affected core cell to be tested. The ISTS Bases for SR 3.1.4.1 was revised in Revision 1 to read:

> "In the event fuel movement is limited to selected core cells, it is the intent of this SR that only those CRDs associated with the core cells affected by the fuel movements are required to be scram time tested. However, if the reactor remains shutdown 120 days, all control rods are required to be scram time tested."

The RBS TS Bases do not contain the ISTS Revision 1 words and the Bases changes alone may not ensure consistent application of the SR. Therefore, RBS prefers to correct the TS in accordance with this TSTF to ensure consistent application. The proposed change moves the first frequency of SR 3.1.4.1 to SR 3.1.4.4 and modifies it to read "associated core cell" rather than "reactor pressure vessel." This is consistent with the intent of the SRs.

SURVEILLANCE REQUIREMENTS

----------NOTE----------
During single control rod scram time Surveillances, the control rod drive (CRD) pumps shall be isolated from the associated scram accumulator.

SURVEILLANCE		FREQUENCY
SR 3.1.4.1	Verify each control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure ≥ 950 psig.	~~Prior to exceeding 40% RTP after fuel movement within the reactor pressure vessel~~ ~~AND~~ Prior to exceeding 40% RTP after each reactor shutdown ≥ 120 days
SR 3.1.4.2	Verify, for a representative sample, each tested control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure ≥ 950 psig.	200 days cumulative operation in MODE 1
SR 3.1.4.3	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with any reactor steam dome pressure.	Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect scram time

(continued)

SURVEILLANCE REQUIREMENT (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.4.4	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure ≥ 950 psig.	Prior to exceeding 40% RTP after work on control rod or CRD System that could affect scram time

INSERT 6

INSERT 6

Prior to exceeding 40% RTP after fuel movement within the affected core cell

AND

FOR INFORMATION ONLY

BASES (continued)

SURVEILLANCE REQUIREMENTS

The four SRs of this LCO are modified by a Note stating that during a single control rod scram time surveillance, the CRD pumps shall be isolated from the associated scram accumulator. With the CRD pump isolated (i.e., charging valve closed), the influence of the CRD pump head does not affect the single control rod scram times. During a full core scram, the CRD pump head would be seen by all control rods and would have a negligible effect on the scram insertion times.

SR 3.1.4.1

The scram reactivity used in DBA and transient analyses is based on assumed control rod scram time. Measurement of the scram times with reactor steam dome pressure ≥ 950 psig demonstrates acceptable scram times for the transients analyzed in References 3 and 4.

Scram insertion times increase with increasing reactor pressure because of the competing effects of reactor steam dome pressure and stored accumulator energy. Therefore, demonstration of adequate scram times at reactor steam dome pressure greater than 950 psig ensures that the scram times will be within the specified limits at higher pressures. Limits are specified as a function of reactor pressure to account for the sensitivity of the scram insertion times with pressure and to allow a range of pressures over which scram time testing can be performed. To ensure scram time testing is performed within a reasonable time following a ~~refueling or after a~~ shutdown ≥ 120 days, all control rods are required to be tested before exceeding 40% RTP. This Frequency is acceptable, considering the additional surveillances performed for control rod OPERABILITY, the frequent verification of adequate accumulator pressure, and the required testing of control rods affected by fuel movement within the associated core cell and by work on control rods or the CRD System.

SR 3.1.4.2

Additional testing of a sample of control rods is required to verify the continued performance of the scram function during the cycle. A representative sample contains at least 10% of the control rods. The sample remains "representative" if no more than 7½% of the control rods in

(continued)

FOR INFORMATION ONLY

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.4.3 (continued)

The Frequency of once prior to declaring the affected control rod OPERABLE is acceptable because of the capability of testing the control rod over a range of operating conditions and the more frequent surveillances on other aspects of control rod OPERABILITY.

or when fuel movement within the reactor pressure vessel occurs

SR 3.1.4.4

When work that could affect the scram insertion time is performed on a control rod or CRD System, testing must be done to demonstrate each affected control rod is still within the limits of Table 3.1.4-1 with the reactor steam dome pressure ≥ 950 psig. Where work has been performed at high reactor pressure, the requirements of SR 3.1.4.3 and SR 3.1.4.4 will be satisfied with one test. For a control rod affected by work performed while shut down, however, a zero pressure and a high pressure test may be required. This testing ensures that the control rod scram performance is acceptable for operating reactor pressure conditions prior to withdrawing the control rod for continued operation. Alternatively, a test during hydrostatic pressure testing could also satisfy both criteria.

INSERT 7

The Frequency of once prior to exceeding 40% RTP is acceptable because of the capability of testing the control rod at the different conditions and the more frequent surveillances on other aspects of control rod OPERABILITY.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10.
2. USAR, Section 4.3.2.5.5.
3. USAR, Section 4.6.1.1.2.5.3.
4. USAR, Section 5.2.2.2.3.
5. USAR, Section 15.4.1.
6. USAR, Section 15.4.9.

INSERT 7

When fuel movement within the reactor pressure vessel occurs, only those control rods associated with the core cells affected by the fuel movement are required to be scram time tested. During a routine refueling outage, it is expected that all control rods will be affected.

Attachment 6

RBG-46763

TSTF-230 - New RHR Suppression Pool Cooling LCO CONDITION

a) Description of Requested Change

Limiting Condition for Operation (LCO) 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," is revised to add a new ACTION (ACTION B) to allow two RHR suppression pool cooling subsystems to be inoperable for 8 hours. Due to this change, the second part of existing CONDITION B is deleted and the entire ACTION B is renumbered as ACTION C. This change is considered to be less restrictive than current requirements.

TSTF-230 has previously been approved for incorporation in the TS for Browns Ferry Units 1, 2, and 3 by license amendments dated June 8, 2001, and the Susquehanna Steam Electric Station by a license amendment dated January 16, 2003. As identified in the TSTF, the Grand Gulf, Hatch, and Peach Bottom Technical Specifications also contain this allowance.

b) Comparison to TSTF

The RBS proposed changes are consistent with the TSTF.

c) Justification

Following a design basis accident, the RHR Suppression Pool Cooling System removes heat from the suppression pool. The suppression pool is designed to absorb the sudden input of heat from the primary system. In the long term, the pool continues to absorb residual heat generated by fuel in the reactor core. The capability to remove heat from the Suppression Pool must be provided in order to maintain the temperature inside the primary containment within design limits.

The current Technical Specifications require a unit shutdown in the event both RHR suppression pool cooling subsystems become inoperable. The proposed change would allow 8 hours to restore one RHR suppression pool cooling subsystem to OPERABLE status before initiating a unit shutdown. The proposed 8 hour time is considered appropriate since an immediate plant shutdown has the potential for resulting in a unit scram and discharge of steam to the suppression pool when both suppression pool cooling subsystems are inoperable and incapable of removing the generated heat. The 8 hours provides time to restore one of the subsystems prior to requiring a unit shutdown, yet is short enough that the probability of an accident occurring during this additional time is not significantly increased. The proposed change also serves to provide consistency between the requirements for RHR suppression pool cooling and LCO 3.6.1.7, "Primary Containment Unit Coolers," which currently allows both primary containment unit coolers to be inoperable for 8 hours.

3.6 CONTAINMENT SYSTEMS

3.6.2.3 Residual Heat Removal (RHR) Suppression Pool Cooling

LCO 3.6.2.3 Two RHR suppression pool cooling subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR suppression pool cooling subsystem inoperable.	A.1 Restore RHR suppression pool cooling subsystem to OPERABLE status.	7 days
~~B.~~ C Required Action and associated Completion Time ~~of Condition A~~ not met. ~~OR~~ ~~Two RHR suppression pool cooling subsystems inoperable.~~	~~B.~~ C.1 Be in MODE 3. AND ~~B.~~ C.2 Be in MODE 4.	12 hours 36 hours
B. Two RHR suppression pool cooling subsystems inoperable.	B.1 Restore one RHR suppression pool cooling subsystem to OPERABLE status.	8 hours

FOR INFORMATION ONLY

BASES

ACTIONS (continued)

C ~~B.1 and B.2~~ INSERT 8

If the Required Action and required Completion Time of Condition A cannot be met or if two RHR suppression pool cooling subsystems are inoperable, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.6.2.3.1

Verifying the correct alignment for manual, power operated, and automatic valves, in the RHR suppression pool cooling mode flow path provides assurance that the proper flow path exists for system operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position since these valves were verified to be in the correct position prior to being locked, sealed, or secured. A valve is also allowed to be in the nonaccident position, provided it can be aligned to the accident position within the time assumed in the accident analysis. This is acceptable, since the RHR suppression pool cooling mode is manually initiated. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

The Frequency of 31 days is justified because the valves are operated under procedural control, improper valve position would affect only a single subsystem, the probability of an event requiring initiation of the system is low, and the subsystem is a manually initiated system. This Frequency has been shown to be acceptable, based on operating experience.

(continued)

INSERT 8

B.1

With two RHR suppression pool cooling subsystems inoperable, one subsystem must be restored to OPERABLE status within 8 hours. In this condition, there is a substantial loss of the primary containment pressure and temperature mitigation function. The 8 hour Completion Time is based on this loss of function and is considered acceptable due to the low probability of a DBA and the potential avoidance of a plant shutdown transient that could result in the need of the RHR suppression pool cooling subsystems to operate.

Attachment 7

RBG-46763

TSTF-306 – LCO ACTIONS Note to Allow Unisolation of Penetration Flow Path(s)

a) Description of Requested Change

Limiting Condition for Operation (LCO) 3.3.6.1 is revised to add an ACTIONS note to allow opening of penetration flow paths, except the drywell 24 inch purge valve penetration flow path, that were isolated to comply with ACTIONS associated with inoperable instrument channels or functions. This allowance is already provided in LCO 3.6.1.3 for Primary Containment Isolation Valves (PCIVs) and in LCO 3.6.5.3 for Drywell Isolation Valves that have been isolated to comply with ACTIONS. The proposed change is administrative in nature. It does not materially alter the original intent of the requirements.

TSTF-306 has previously been approved for incorporation in the TS for Grand Gulf Nuclear Station by a license amendment dated January 8, 2004, and the Susquehanna Steam Electric Station by a license amendment dated June 5, 2003.

b) Comparison to TSTF

The RBS proposed changes are consistent with the intent of the TSTF; however, RBS Technical Specification 3.3.6.1 applies to both primary containment and drywell isolation instrumentation functions whereas the improved STS NUREG 1434 does not specifically address drywell isolation as a function of particular instrumentation. The new Note is intended to apply to both primary containment and drywell isolation instrumentation functions. Because the note associated with LCO 3.6.5.3 for the Drywell Isolation Valves takes exception to the drywell 24 inch purge valve penetration flow path, the note added to LCO 3.3.6.1 will also contain this exception.

c) Justification

This change provides consistency between the TS requirements for isolation valves and TS requirements for the instrumentation that supports the isolation valve function. It also provides additional flexibility in the performance of maintenance activities.

TSTF-306 was created to add an ACTIONS Note to LCO 3.3.6.1 to allow opening of primary containment penetration flow paths that were isolated to comply with ACTIONS associated with inoperable instrument channels or functions. This allowance is already provided in LCO 3.6.1.3 for Primary Containment Isolation Valves (PCIVs) and in LCO 3.6.5.3 for Drywell Isolation Valves (with the exception of the 24 inch purge valve penetration flow path), that have been isolated to comply with ACTIONS. Since the isolation instrumentation serves as a support system for the isolation valves, the ACTIONS for inoperable instrumentation need not be more restrictive than that for the function that it supports. As such, the

allowance for intermittent operation of the isolation valves may be similarly added to the LCO for the supporting instrumentation.

The new Note is intended to apply to both primary containment and drywell isolation instrumentation functions. The justification is the same for both functions. Both the RBS Technical Specifications and the improved STS NUREG currently include a Note in LCO 3.6.5.3, Drywell Isolation Valves, allowing the intermittent opening of drywell penetrations that have been isolated to comply with the TS ACTIONS. These notes differ in that the RBS Technical Specifications contain an exception to this allowance for the drywell 24 inch purge valve penetration flow path while the STS NUREG does not contain this exception. Since the drywell isolation instrumentation serves the drywell isolation function, the ACTIONs for the supporting instrumentation need not be more restrictive than the function it supports.

Entergy has reviewed TSTF-306, Revision 2 and has determined that the proposed change and the associated justification are applicable to RBS. The new Note to LCO 3.3.6.1 for the supporting isolation instrumentation provides consistency with the current Note for LCO 3.6.1.3 and LCO 3.6.5.3 for the isolation functions that they support. The same administrative controls described in the TS Bases for the PCIVs and Drywell isolation valves will be applied to the supporting instrumentation LCO. These controls consist of stationing a dedicated operator at the controls of the valve, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when the need for primary containment or drywell isolation is indicated. Therefore, the proposed change does not significantly affect the ability of the containment isolation system to perform its safety function.

3.3 INSTRUMENTATION

3.3.6.1 Primary Containment and Drywell Isolation Instrumentation

LCO 3.3.6.1 The primary containment and drywell isolation instrumentation for each Function in Table 3.3.6.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.6.1-1.

ACTIONS

5

NOTE

2. Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required channels inoperable.	A.1 Place channel in trip.	12 hours for Functions 2.b, 5.b, 5.d, and 5.e AND 24 hours for Functions other than Functions 2.b, 5.b, 5.d, and 5.e
B. One or more automatic Functions with isolation capability not maintained.	B.1 Restore isolation capability.	1 hour

(continued)

1. Penetration flow paths, except for the drywell 24 inch purge valve penetration flow path, may be unisolated intermittently under administrative controls.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

5.e. Drywell Pressure-High (continued)

The Allowable Value was selected to be the same as the ECCS Drywell Pressure-High Allowable Value (LCO 3.3.5.1), since this may be indicative of a LOCA inside primary containment.

This Function isolates the Group 10 and 14 valves.

5.f. Manual Initiation

The Manual Initiation push button channels introduce signals into the RHR Shutdown Cooling System isolation logic that are redundant to the automatic protective instrumentation and provide manual isolation capability. There is no specific USAR safety analysis that takes credit for this Function. It is retained for the isolation function as required by the NRC in the plant licensing basis.

There are four push buttons for the logic, two manual initiation push buttons per trip system. There is no Allowable Value for this Function since the channels are mechanically actuated based solely on the position of the push buttons.

Four channels of the Manual Initiation Function are available and are required to be OPERABLE.

ACTIONS

INSERT 9

~~A~~ 2 Note ~~has~~ been provided to modify the ACTIONS related to primary containment and drywell isolation instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable primary containment and drywell isolation instrumentation channels provide appropriate compensatory measures for separate inoperable channels. As such, a Note has been provided that allows separate Condition entry for each inoperable primary containment and drywell isolation instrumentation channel.

(continued)

INSERT 9

The ACTIONS are modified by two Notes. Note 1 allows penetration flow path(s), with the exception of the drywell 24 inch purge valve flow path, to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated operator at the controls of the valve, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for primary containment and/or drywell isolation is indicated.

Attachment 8

RBG-46763

NO SIGNIFICANT HAZARDS EVALUATION FOR TSTF-230

TSTF-230 modifies Limiting Conditions for Operation (LCO) 3.6.2.3 to be less restrictive. However, the LCO continues to assure that the necessary quality of systems and components is maintained and that facility operation will be within safety limits. Therefore, the proposed less restrictive change still affords adequate assurance of safety when judged against current regulatory standards.

Entergy Operations, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change relaxes the Required Actions of LCO 3.6.2.3 by allowing 8 hours to restore one RHR suppression pool cooling subsystem to OPERABLE status when both subsystems have been determined to be inoperable. Required Actions and their associated Completion Times are not initiating conditions for any accident previously evaluated. The proposed 8 hour Completion Time provides some time to restore required subsystem(s) to OPERABLE status, yet is short enough that operating an additional 8 hours is not a significant risk. The Required Actions in the proposed change have been developed to provide assurance that appropriate remedial actions are taken in response to the degraded condition, considering the operability status of the RHR Suppression Pool Cooling System and the capability of minimizing the risk associated with continued operation. As a result, neither the probability nor the consequences of any accident previously evaluated are significantly increased. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical modification or alteration of plant equipment (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The Required Actions and associated Completion Times in the proposed change have been evaluated to ensure that no new accident initiators are introduced. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The relaxed Required Actions do not involve a significant reduction in a margin of safety. The proposed change has been evaluated to minimize the risk of continued operation with both RHR suppression pool cooling subsystems inoperable. The operability status of the RHR Suppression Pool Cooling System, a reasonable time for repair or replacement of required features, and the low probability of a design basis accident occurring during the repair period have been considered in the evaluation. Therefore, this change does not involve a significant reduction in a margin of safety.

Attachment 9

RBG-46763

NO SIGNIFICANT HAZARDS EVALUATION FOR TSTF-163, TSTF-222, AND TSTF-306

TSTF-163, TSTF–222, and TSTF–306 are considered administrative changes because the proposed modification of the TS wording does not materially alter the original intent of the current requirements.

Entergy Operations, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The minor administrative changes which, (1) corrects Action Statement 3.7.2.F, and (2) changes a reference number from "ANSI N510-1989" to "ASME N510-1989," has no impact on any structure, system, component, program, or analysis.

   The adoption of TSTF-163 does not change the manner in which the EDGs are operated and, when implemented, will continue to ensure the EDGs perform their function when called upon. The proposed revision to the TS SRs will continue to ensure that minimum frequency and voltage are attained within the required time. The SRs will continue to ensure that proper steady state voltage and frequency are attained consistent with proper EDG governor and voltage regulator performance. Therefore, the probability or consequences of previously evaluated accidents are not significantly increased.

   The proposed change to adopt TSTF-222 is an administrative clarification of existing Technical Specification requirements regarding scram time testing requirements for control rods. It consists of administrative changes that involve wording changes that clarify requirements without changing the original intent. As such, these types of changes do not affect initiators of analyzed events and do not affect the mitigation of any accidents or transients.

   The proposed change to adopt TSTF-306 allows primary containment and drywell isolation valves to be unisolated under administrative controls when the associated isolation instrumentation is not operable. The isolation function is an accident mitigating function and is not an initiator of an accident previously evaluated. Administrative controls are required to be in effect when the valves are unisolated so that the penetration can be rapidly isolated when the need is indicated. Therefore, the probability or consequences of previously evaluated accidents are not significantly increased.

   Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The minor administrative changes which, (1) corrects Action Statement 3.7.2.F, and (2) changes a reference number from "ANSI N510-1989" to "ASME N510-1989," has no impact on any structure, system, component, program, or analysis.

The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed), do not change the design function of any equipment, and do not change the methods of normal plant operation. Accordingly, the proposed changes do not create any new credible failure mechanisms, malfunctions, or accident initiators not previously considered in the RBS design and licensing basis.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The minor administrative changes which, (1) corrects Action Statement 3.7.2.F, and (2) changes a reference number from "ANSI N510-1989" to "ASME N510-1989," has no impact on any structure, system, component, program, or analysis.

Adoption of TSTF-163 does not impact EDG performance, including the capability for each EDG to attain and maintain required voltage and frequency for accepting and supporting plant safety loads within the required time, as assumed in the plant safety analysis. The proposed change does not involve a significant reduction in a margin of safety since the operability of the EDGs continues to be determined as required to support the capability of the EDGs to provide emergency power to plant equipment that mitigate the consequences of an accident.

The proposed change associated with TSTF-222 involves an administrative clarification to better delineate the requirements for scram time testing control rods following refueling outages and for control rods requiring testing due to work activities. As such, the proposed change does not involve a significant reduction in the margin of safety.

The change to allow containment and drywell isolation valves to be unisolated under administrative control (TSTF-306) does not reduce any margins to safety because the proposed allowance for the supporting isolation instrumentation is no less restrictive than the allowance for the equipment it supports. When the valves are unisolated, the design basis function of containment isolation is maintained by administrative controls.

The proposed changes have no affect on any safety analysis assumptions or methods of performing safety analyses. The changes do not adversely affect system OPERABILITY or design requirements and the equipment continues to be tested in a manner and at a

frequency necessary to provide confidence that the equipment can perform its intended safety functions. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Entergy concludes that the proposed amendment(s) present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

Attachment 10

RBG-46763

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
RBS will periodically monitor and trend the time it takes for each DG to reach steady state operation to identify degradation of governor and voltage regulator performance.		X	Upon implementation of the TS amendment