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Eric Olson
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RBG-47146

June 10, 2011

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

SUBJECT: License Amendment Request
Application for Technical Specification Changes Technical Specification
Task Force (TSTF) Improved Standard Technical Specification Change
Traveler, TSTF-427, "Allowance for Non Technical Specification Barrier
Degradation on Supported System OPERABILITY."
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

Dear Sir or Madam:

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Entergy Operations, Inc. (Entergy) is submitting a request for an amendment to the Technical Specifications (TS) for River Bend Station (RBS), Unit 1.

The proposed amendment adds a new LCO Applicability requirement, LCO 3.0.9, and its associated Bases, to address barriers which cannot perform their related support function for Technical Specification systems. This change is consistent with NRC approved Revision 2 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-427, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY." The availability of the model safety evaluation for this TS improvement was announced in the *Federal Register* on October 3, 2006 (71 FR 58444) as part of the Consolidated Line Item Improvement Process (CLIIP).

Attachment 1 provides a description of the proposed change. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides the existing TS Bases pages marked up to show the proposed change (for information only). Attachment 4 provides a summary of the regulatory commitments made in this submittal.

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Although this request is neither exigent nor emergency, your prompt review is requested. Once approved, the amendment shall be implemented within 60 days. If you have any questions or require additional information, please contact Mr. Barry M. Burmeister at (225) 381-4148.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2011

Sincerely,



EO/DNL/bmb

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. Changes to Technical Specification Bases Pages – For Information Only
4. List of Regulatory Commitments

cc: Regional Administrator
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U. S. Nuclear Regulatory Commission
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e-mail: Standard Distribution

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Attachment 1

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Analysis of Proposed Technical Specification Change

1.0 DESCRIPTION

The proposed amendment adds a new Technical Specification (TS) LCO Applicability requirement, LCO 3.0.9, and its associated Bases, to address barriers which cannot perform their related support function for Technical Specification systems. This change is consistent with NRC approved Revision 2 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-427, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY." The availability of the model safety evaluation for this TS improvement was announced in the *Federal Register* on October 3, 2006 (71 FR 58444) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 PROPOSED CHANGE

The proposed amendment adds a new LCO Applicability requirement, LCO 3.0.9, and its associated Bases, to address barriers which cannot perform their related support function for Technical Specification systems.

The new specification will allow a delay in entering the supported system LCO up to 30 days when a required barrier is unable to perform its required function(s). Limits on the use of this new LCO are consistent with the NRC approved TSTF-427. The proposed LCO 3.0.9 is included as Attachment 2 of this submittal.

The associated Bases are included as Attachment 3 for information.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability of Model Safety Evaluation on Technical Specification Improvement to Modify Requirements Regarding LCO 3.0.9 published on October 3, 2006 (71 FR 58444).

4.0 TECHNICAL ANALYSIS

Entergy has reviewed the Safety Evaluation (SE) published on October 3, 2006 (71 FR 58444) as part of the CLIIP Notice of Availability of the Model Safety Evaluation. Entergy has concluded that the technical justifications presented in the SE prepared by the NRC staff are applicable to River Bend Station, Unit 1 (RBS) and therefore justify this amendment for the incorporation of the proposed changes to the River Bend Station, Unit 1, TS. No deviation from the approved standard Technical Specifications are proposed.

Entergy will establish the Technical Specification Bases for LCO 3.0.9 as adopted with the applicable license amendment, within 60 days of amendment issuance.

Entergy is not proposing any variations or deviations from the TS changes described in the TSTF-427, Revision 2, or the NRC staffs model safety evaluation dated October 3, 2006.

Note, Entergy has not requested TSTF-372 therefore, specification 3.0.8 is included as "NOT USED."

As discussed in the notice of availability published in the *Federal Register* on October 3, 2006 for this TS improvement, plant-specific regulatory commitments are made as follows:

1. Entergy commits to the guidance of NUMARC 93-01 Section 11, which provides guidance and details on the assessment and management of risk during maintenance.
2. Entergy will revise procedures to ensure that the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall configuration risk management program to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided.

In addition, Entergy will establish the Technical Specification Bases for LCO 3.0.9 as adopted with the applicable license amendment.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration Determination

Entergy has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the *Federal Register* as part of the CLIP. Entergy has concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to River Bend Station and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91 (a).

5.2 Applicable Regulatory Requirements/Criteria

A description of the proposed TS change and its relationship to applicable regulatory requirements was provided in the NRC Notice of Availability of the Model Safety Evaluation published on October 3, 2006.

6.0 ENVIRONMENTAL CONSIDERATION

Entergy has reviewed the environmental evaluation included in the safety evaluation published on October 3, 2006, as part of the CLIP Notice of Availability of the Model Safety Evaluation. Entergy has concluded that the staff's findings presented in that evaluation are applicable to RBS, Unit 1 and the evaluation is hereby incorporated by reference for this application.

7.0 REFERENCES

1. Federal Register Notice (71 FR 58444), dated October 3, 2006, "Notice of Availability of Model Application Concerning Technical Specification Improvement To Modify Requirements Regarding The Addition of LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process"
2. Technical Specification Task Force (TSTF) Improved Technical Specification Change Traveler, TSTF-427, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY," Revision 2.

Attachment 2

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Proposed Technical Specification Changes (mark-up)

Note, markup deletions identified by strikethrough (~~delete~~) and additions identified by underline (addition).

3.0 LCO APPLICABILITY (continued)

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8 Not Used

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Core Spray system, the Reactor Core Isolation Cooling system, and the Automatic Depressurization System are considered independent subsystems of a single system.]

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 3

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Changes to Technical Specification Bases Pages

For Information Only

Note, markup deletions identified by strikethrough (~~delete~~) and additions identified by underline (addition).

BASES

LCO 3.0.7
(continued)

demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.10 allow specified TS requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO's ACTIONS may direct the other LCO's ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.

LCO 3.0.8

Not Used

LCO 3.0.9

LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support

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BASES

LCO 3.0.9
(continued)

function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are demonstrate select unit performance characteristics, to perform special otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

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BASES

LCO 3.0.9
(continued)

This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The HPCS (High Pressure Core Spray) and RCIC (Reactor Core Isolation Cooling) systems are single train systems for injecting makeup water into the reactor during an accident or transient event. The RCIC system is not a safety system, nor required to operate during a transient, therefore, it does not have to meet the single failure criterion. The HPCS system provides backup in case of a RCIC system failure. The ADS (Automatic Depressurization System) and low pressure ECCS coolant injection provide the core cooling function in the event of failure of the HPCS system during an accident. Thus, for the purposes of LCO 3.0.9, the HPCS system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.9 can be used on these single train systems in a manner similar to multiple train or subsystem systems.]

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 4

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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
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy will establish the Technical Specification Bases for LCO 3.0.9 as adopted with the applicable license amendment.	X		Within 60 days of amendment issuance
Entergy commits to the guidance of NUMARC 93-01 Section 11, which provides guidance and details on the assessment and management of risk during maintenance.		X	Within 60 days of amendment issuance
Entergy will revise procedures to ensure that the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall configuration risk management program to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided.	X		Within 60 days of amendment issuance