From: BICE, DAVID B [DBICE@entergy.com]
Sent: Thursday, July 28, 2011 10:18 AM
To: Kalyanam, Kaly
Cc: CLARK, ROBERT W; PYLE, STEPHENIE L
Subject: Upcoming TS Change

Importance: High

Kaly,

As has been discussed somewhat in our biweekly calls, ANO-2 (CE, non-ITS plant) is nearing the time we will submit proposed TS changes that support our new Fuel Handling Accident (FHA) analysis. This part of the change is a side-bar from Alternate Source Term which was recently approved for ANO-2 and is pretty straight forward.

Due to the significant costs of TS changes, Entergy has a practice of reviewing a database of awaiting changes for any TS page that is being changed for another reason. In this case, we have determined that four TSTFs should be adopted simultaneously with the above change, since there is overlap between the TSs affected by the TSTFs and the TSs affected by the above FHA analysis. These TSTFs have long been on our plate to adopt, are someone older TSTFs, and all are associated with shutdown conditions. Note that the FHA change must be submitted since our TSs are non-conservative in this regard (being tracked by a Condition Report and Administrative controls are already in place IAW Admin Letter 98-10).

As a result, on the surface the TS package may appear to be quite complex. However, the package is laid out such that each TSTF and the FHA are discussed separately and in a logical order, with the order maintained in each section of the LAR requiring discussion (proposed change, background, and technical justification sections). The changes necessary for each are discussed separately, and any "differences" between the TSTFs and our adoption of the TSTFs are discussed on a per-TSTF basis. Probably the biggest thing that makes it seem complex is that ANO-2 is non-ITS, so there are inherent wording differences that come along with the change, especially since ITS and Custom TS usage rules are different.

We wish to take every opportunity available to discuss this submittal with the Staff in order to minimize any issues that may arise during the NRC acceptance review. Therefore, I'd prefer a presubmittal conference call if possible. If necessary, I can come to your offices for a face-to-face meeting. To accommodate presubmittal discussions, I've included a short summary of the changes we will be proposing below. TSTF-51 is the oldest and farthest-reaching of the bunch. The others are pretty easy to grasp. From a standpoint of picking NRC reviewers, the changes are basically associated with moving fuel or shutdown reactivity. They do NOT affect dry fuel storage. Please let me know how you wish to proceed. Thanks very much for your patience in this matter.

David Bice
ANO Licensing

FHA - our old analysis did not consider the weight of the grapple and other components and therefore assumed the failure of only the dropped assembly. Our new analysis (already reviewed and found acceptable by the NRC in our AST letters), considers the added weight and results in the failure of both the dropped assembly and the impacted assembly seated in the vessel or fuel pool. This requires a change to all TSs that discuss the "movement of fuel" since related TSs may now be applicable even if moving new (unirradiated) fuel over irradiated fuel. Obviously, this affects a lot of TSs.

TSTF-51 - this is a very old TSTF that removes reference to "core alterations" and instead keys on the "movement of fuel" which is the bounding item considered in FHA analyses throughout the industry. It also adds the term "recently" to "irradiated fuel" for those plants and situations where analysis has shown that an FHA long after shutdown would not result in offsite dose limits being exceeded (for ANO, this would be > 100 hours after shutdown, as previously reviewed and accepted by the NRC). Note that we are not adding the "recently" term to Control Room Emergency Ventilation System (CREVS) related specs (i.e., we are still going to require operable CREVS no matter how long we've been shutdown).

TSTF-272 - this corrects a deficiency in the Refueling Boron spec which currently only applies to the RCS. The correction applies the boron requirement to the Refueling Canal whenever it is connected to the RCS (vessel head removed).

TSTF-286 - This allows operators to control the plant by making minor changes in inventory level, temperature, etc. as needed, during conditions where the TSs require ceasing positive reactivity additions, provided required Shutdown Margin is maintained.

TSTF-471 - This is simply a supplement to TSTF-51 above. Following TSTF-51, it was noted the "core alterations" term was also located in some other specs. This TSTF deletes this term from the remaining locations.

RELOCATIONS/DELETIONS - while comparing the TSTFs with our specs along with performing a word search to ensure all affected TSs were identified, we had hits on specs that no longer exist in the ITS standard. These TSs are mainly proposed for relocation to the site Technical Requirements Manual (part of the SAR) consistent with ITS. One is proposed for deletion (minimum RCS flow for boron dilution) because it can be covered by other TSs, provided a couple minor changes are made to these specs (included in the submittal). The relocations are (short title): Decay Time, Communications (during fuel handling), Refueling Machine, and Crane Travel over fuel pool.