



Mike Perito
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GNRO-2011/00093

October 28, 2011

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

SUBJECT:

License Renewal Application

Grand Gulf Nuclear Station, Unit 1

Docket No. 50-416 License No. NPF-29

#### Dear Sir or Madam:

Pursuant to 10 CFR 51 and 10 CFR 54, Entergy Operations, Inc. (EOI) hereby applies for renewal of the operating license for the Grand Gulf Nuclear Station (GGNS) to extend the license for an additional 20 years beyond the current expiration date. With renewal, the GGNS operating license would be extended from midnight on November 1, 2024 to midnight on November 1, 2044.

The enclosed License Renewal Application and related Appendices contain the information required by 10 CFR 54 for the contents of an application.

As required by 10 CFR 54.21(b), current licensing basis changes which have a material effect on the content of this application, including the Final Safety Analysis Report (FSAR) Supplement (Appendix A), will be identified at least annually while the application is under NRC review and at least three months prior to the scheduled completion of the NRC review.

This application is submitted in accordance with 10 CFR 2 Subpart A, 10 CFR 50.4, and 10 CFR 50.30. EOI hereby submits the original of the application pursuant to 10 CFR 50.4(b), 10 CFR 51.55(a), and 10 CFR 54.17(a).

Commitments contained in this application are summarized in the attachment.

A035

If you have any questions or require additional information, please contact Christina L. Perino at 601-437-6299.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 28th day of October, 2011.

Sincerely,

GMPO/GGNS Acting VP for Mike Perito

MP/JAS

#### Attachment:

1. List of Regulatory Commitments

#### Enclosure:

License Renewal Application 1.

2. Appendix A Updated Final Safety Analysis Report Supplement

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CD of LRA Suitable for ADAMS 7.

cc: with Attachment and Enclosures

Mr. John P. Boska, Project Manager Plant Licensing Branch I-1 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Mail Stop O-8-C2 Washington, DC 20555

cc: without Attachment and Enclosures

Mr. Elmo E. Collins, Jr. Regional Administrator, Region IV U. S. Nuclear Regulatory Commission 612 East Lamar Blvd., Suite 400 Arlington, TX 76011-4125

U. S. Nuclear Regulatory Commission ATTN: Mr. A. Wang, NRR/DORL Mail Stop OWFN/8 G14 11555 Rockville Pike Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission ATTN: Mr. Nathaniel Ferrer NRR/DLR Mail Stop OWFN/ 11 F1 11555 Rockville Pike Rockville, MD 20852-2378

NRC Senior Resident Inspector Grand Gulf Nuclear Station Port Gibson, MS 39150

State Health Officer Mississippi Department of Health P. O. Box 1700 Jackson, MS 39215-1700 Attachment 1 to

GNRO-2011/00093

**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	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
1	Implement the 115 kilovolt (KV) Inaccessible Transmission Cable Program for Grand Gulf Nuclear Station (GGNS) as described in License Renewal Application (LRA) Section B.1.1	Prior to November 1, 2024	GNRO- 2011/00093	B.1.1
2	Implement the Aboveground Metallic Tanks Program for GGNS as described in LRA Section B.1.2	Prior to November 1, 2024	GNRO- 2011/00093	B.1.2
3	Enhance the Bolting Integrity Program for GGNS to clarify the prohibition on use of lubricants containing MoS <sub>2</sub> for bolting, and to specify that proper gasket compression will be visually verified following assembly.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.3
	Enhance the Bolting Integrity Program to include consideration of the guidance applicable for pressure boundary bolting in Regulatory Guide (NUREG) 1339, Electric Power Research Institute (EPRI) NP-5769, and EPRI TR-104213.			
	Enhance the Bolting Integrity Program to include volumetric examination per American Society of Mechanical Engineers (ASME) Code Section IX, Table IWB-2500-1, Examination Category B-G-1, for high-strength closure bolting regardless of code classification.			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
4	Enhance the Boraflex Monitoring Program for GGNS to perform periodic surveillances of the boraflex neutron absorbing material on at least a five year frequency using Boron-10 Areal Density Gage for Evaluating Racks (BADGER) testing.  RACKLIFE analysis will continue to be performed each cycle. This analysis will include a comparison of the RACKLIFE predicted silica to the plant measured silica. This comparison will determine if adjustments to the RACKLIFE loss coefficient are merited. The analysis will include projections to the next planned RACKLIFE analysis date to ensure current Region I storage locations will not need to be reclassified as Region II storage locations in the analysis interval.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.4
. 5	Implement the Buried Piping and Tanks Inspection Program for GGNS as described in LRA Section B.1.5.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.5

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
6	Enhance the Boiling Water Reactor (BWR) Vessel Internals Program for GGNS as follows.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.11
	(a) Evaluate the susceptibility to neutron or thermal embrittlement for reactor vessel internal components composed of CASS, X-750 alloy, precipitation-hardened (PH) martensitic stainless steel(e.g., 15-5 and 17-4 PH steel), and martensitic stainless steel (e.g., 403, 410 and 431 steel).			
	(b) Inspect portions of the susceptible components determined to be limiting from the standpoint of thermal aging susceptibility, neutron fluence, and cracking susceptibility (i.e., applied stress, operating temperature, and environmental conditions). The inspections will use an inspection technique capable of detecting the critical flaw size with adequate margin. The critical flaw size will be determined based on the service loading condition and service-degraded material properties. The initial inspection will be performed either prior to or within 5 years after entering the period of extended operation. If cracking is detected after the initial inspection, the frequency of re-inspection will be justified based on fracture toughness properties appropriate for the condition of the component. The sample size will be 100% of the accessible component population, excluding components that may be in compression during normal operations.			

Enhance the Compressed Air Monitoring Program for GGNS to apply a consideration of the guidance of ASME OM-S/G-1998, Part 17; ANSI/ISA-S7.0.01-1996; EPRI NP-7079; and EPRI TR-108147.  Enhance the Compressed Air Monitoring Program to include periodic and opportunistic inspections of accessible internal surfaces of the following compressed air systems.  • Automatic Depressurization System (ADS) air  • Division 1 Diesel Generator Starting Air (D1DGSA)  • Division 2 Diesel Generator Starting Air (D2DGSA)	#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
<ul> <li>Division 3 Diesel Generator Starting Air (D3DGSA), also known as the HPCS Diesel Generator</li> <li>Instrument Air (IA)</li> </ul>	7	for GGNS to apply a consideration of the guidance of ASME OM-S/G-1998, Part 17; ANSI/ISA-S7.0.01-1996; EPRI NP-7079; and EPRI TR-108147.  Enhance the Compressed Air Monitoring Program to include periodic and opportunistic inspections of accessible internal surfaces of the following compressed air systems.  • Automatic Depressurization System (ADS) air  • Division 1 Diesel Generator Starting Air (D1DGSA)  • Division 2 Diesel Generator Starting Air (D2DGSA)  • Division 3 Diesel Generator Starting Air (D3DGSA), also known as the HPCS Diesel Generator	November 1,		B.1.12

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
8	Ennance the Diesel Fuel Monitoring Program to	Prior to November 1, 2024	GNRO- 2011/00093	B.1.16
	Enhance the Diesel Fuel Monitoring Program to include a volumetric examination of affected areas of the diesel fuel tanks if evidence of degradation is observed during visual inspection. The scope of this enhancement includes the diesel fuel oil day tanks (Divisions I, II, III), the diesel fuel oil storage tanks (Divisions I, II, III), the diesel fuel oil drip tanks (Divisions I, II), and the diesel fire pump fuel oil storage tanks, and is applicable to the inspections performed during the 10-year period prior to the period of extended operation and at succeeding 10-year intervals.			
9	Enhance the External Surfaces Monitoring Program to include instructions for monitoring of the aging effects for flexible polymeric components through manual or physical manipulation of the material, including a sample size for manipulation of at least 10 percent of available surface area.  Enhance the External Surfaces Monitoring Program as follows.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.18
	<ol> <li>Underground components within the scope of this program will be clearly identified in program documents.</li> <li>Instructions will be provided for inspecting all underground components within the scope of this program during each 10-year period, beginning 10 years prior to entering the period of extended operation.</li> </ol>			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
10	Enhance the Fatigue Monitoring Program to monitor and track all critical thermal and pressure transients for all components that have been identified to have a fatigue Time-Limited Aging Analyses (TLAA).	Two years prior to November 1, 2024	GNRO- 2011/00093	B.1.19
	Enhance the Fatigue Monitoring Program to perform a review of the GGNS high energy line break analyses and the corresponding tracking of associated cumulative usage factors to ensure the GGNS program adequately manages fatigue usage for these locations.			
	Fatigue usage calculations that consider the effects of the reactor water environment will be developed for a set of sample reactor coolant system components. This sample set will include the locations identified in NUREG/CR-6260 and additional plant-specific component locations in the reactor coolant pressure boundary if they are found to be more limiting than those considered in NUREG/CR-6260.			
	Enhance the Fatigue Monitoring Program to provide updates of the fatigue usage calculations on an asneeded basis if an allowable cycle limit is approached, or in a case where a transient definition has been changed, unanticipated new thermal events are discovered, or the geometry of components have been modified.			
11	Enhance the Fire Protection Program to require visual inspections of the Halon/CO2 fire suppression system at least once every fuel cycle to examine for signs of corrosion.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.20
	Enhance the Fire Protection Program to require visual inspections of fire damper framing at least once every fuel cycle to check for signs of degradation.			
	Enhance the Fire Protection Program to require visual inspection of concrete curbs, manways, hatches, manhole covers, hatch covers, and roof slabs at least once every fuel cycle to confirm that aging effects are not occurring.			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
12	Enhance the Fire Water Program to include inspection of hose reels for degradation. Acceptance criteria will be enhanced to verify no unacceptable degradation.  Enhance the Fire Water Program to include one of the following options.  (1) Wall thickness evaluations of fire protection piping using non-intrusive techniques (e.g., volumetric testing) to identify evidence of loss of material will be performed prior to the period of extended operation and at periodic intervals thereafter. Results of the initial evaluations will be used to determine the appropriate inspection interval to ensure aging effects are identified prior to loss of intended function.  OR  (2) A visual inspection of the internal surface of fire protection piping will be performed upon each entry to the system for routine or corrective maintenance. These inspections will be capable of evaluating (a) wall thickness to ensure against catastrophic failure and (b) the inner diameter of the piping as it applies to the design flow of the fire protection system. Maintenance history shall be used to demonstrate that such inspections have been performed on a representative number of locations prior to the period of extended operation. A representative number is 20% of the population (defined as locations having the same material, environment, and aging effect combination) with a maximum of 25 locations. Additional inspections will performed as needed to obtain this representative sample prior to the period of extended operation.		SOURCE  GNRO- 2011/00093	LRA SECTION / AUDIT ITEM B.1.21

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
12 (cont.)	Enhance the Fire Water Program to include a visual inspection of a representative number of locations on the interior surface of below grade fire protection piping in at least one location at a frequency of at least once every 10 years during the period of extended operation. A representative number is 20% of the population (defined as locations having the same material, environment, and aging effect combination) with a maximum of 25 locations. Acceptance criteria will be revised to verify no unacceptable degradation.  Enhance the Fire Water Program to test or replace a representative sample of sprinkler heads before the end of the 50-year sprinkler head service life and at 10-year intervals thereafter during the period of extended operation. Acceptance criteria will be no unacceptable degradation. NFPA-25 defines a representative sample of sprinklers to consist of a minimum of not less than 4 sprinklers or 1 percent of the number of sprinklers per individual sprinkler		GNRO- 2011/00093	
	Enhance the Fire Water Program to include visual inspection of spray and sprinkler system internals for evidence of degradation. Acceptance criteria will be enhanced to verify no unacceptable degradation.			
13	Enhance the Flow-Accelerated Corrosion Program to revise program documentation to specify that downstream components are monitored closely to mitigate any increased wear when susceptible upstream components are replaced with resistant materials, such as high Cr material.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.22
14	Enhance the Inservice Inspection - IWF Program to address inspections of accessible sliding surfaces.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.24
		<u> </u>	l	L

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
14 (cont.)	Enhance the Inservice Inspection - IWF Program to; clarify that parameters monitored or inspected will include corrosion; deformation; misalignment of supports; missing, detached, or loosened support items; improper clearances of guides and stops; and improper hot or cold settings of spring supports and constant load supports. Accessible areas of sliding surfaces will be monitored for debris, dirt, or indications of excessive loss of material due to wear that could prevent or restrict sliding as intended in the design basis of the support. Elastomeric vibration isolation elements will be monitored for cracking, loss of material, and hardening. Structural bolts will be monitored for corrosion and loss of integrity of bolted connections due to self-loosening and material conditions that can affect structural integrity. High-strength structural bolting (actual measured yield strength greater than or equal to 150 ksi or 1,034 MPa in sizes greater than 1 inch nominal diameter) susceptible to stress corrosion cracking (SCC) will be monitored for SCC.		GNRO- 2011/00093	
	<ul> <li>Enhance the Inservice Inspection - IWF Program to clarify that detection of aging will include:</li> <li>a) Monitoring structural bolting (American Society for Testing and Materials (ASTM) A-325, ASTM F1852, and ASTM A490 bolts) and anchor bolts will be monitored for loss of material, loose or missing nuts, loss of pre-load and cracking of concrete around the anchor bolts.</li> <li>b) Volumetric examination comparable to that of ASME Code Section XI, Table IWB-2500-1, Examination Category B-G-1 should be performed for high strength structural bolting to detect cracking in addition to the VT-3 examination. This volumetric examination may be waived with adequate plant-specific justification.</li> </ul>			

B.1.25
B.1.26

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
17	Enhance the Masonry Wall Program to clarify that parameters monitored or inspected will include monitoring gaps between the supports and masonry walls that could potentially affect wall qualification.  Enhance the Masonry Wall Program to clarify that detection of aging effects require masonry walls to be inspected every 5 years unless technical justification is provided to extend the inspection to a period not to exceed 10 years.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.27
18	Implement the Non-EQ Cable Connections Program as described in LRA Section B.1.28	Prior to November 1, 2024	GNRO- 2011/00093	B.1.28
19	Enhance the Non environmentally Qualified (Non-EQ) Inaccessible Power Cables (400V to 35kV) Program to include low-voltage (400V to 2kV) power cables.  Enhance the Non-EQ Inaccessible Power Cables (400V to 35kV) Program to include condition-based inspections of manholes not automatically dewatered by a sump pump being performed following periods of heavy rain or potentially high water table conditions, as indicated by river level.  Enhance the Non-EQ Inaccessible Power Cables (400V to 35kV) Program to clarify that the inspections will include direct observation that cables are not wetted or submerged, that cables/splices and cable support structures are intact, and that dewatering/drainage systems (i.e., sump pumps) and associated alarms if applicable operate properly.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.29
20	Implement the Non-EQ Instrumentation Circuits Test Review Program as described in LRA Section B.1.30.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.30
21	Implement the Non-EQ Insulated Cables and Connections Program as described in LRA Section B.1.31.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.31

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
22	Enhance the Oil Analysis Program to provide a formalized analysis technique for particulate counting.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.32
	Enhance the Oil Analysis Program to include piping and components within the main generator system (N41) with an internal environment of lube oil.			
23	Implement the One-Time Inspection Program as described in LRA Section B.1.33.	Within the 10 years prior to November 1, 2024	GNRO- 2011/00093	B.1.33
24	Implement the One-Time Inspection – Small Bore Piping Program as described in LRA Section B.1.34.	Within the 6 years prior to November 1, 2024	GNRO- 2011/00093	B.1.34
25	Enhance the Periodic Surveillance and Preventive Maintenance Program to include all activities described in the table provided in LRA Section B.1.35 program description.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.35
26	Enhance the Protective Coating Program to include parameters monitored or inspected by the program per the guidance provided in ASTM D5163-08.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.36
	Enhance the Protective Coating Monitoring and Maintenance Program to provide for inspection of coatings near sumps or screens associated with the Emergency Core Cooling System.			·
	Enhance the Protective Coating Program to include acceptance criteria per ASTM D 5163-08.			
27	Enhance the Reactor Vessel Surveillance Program to ensure that the additional requirements specified in the final NRC safety evaluation for BWRVIP-86 Revision 1 are addressed before the period of extended operation.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.38

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
28	Enhance the Regulatory Guide (RG) 1.127, Inspection of Water-Control Structures Associated With Nuclear Power Plant Program to clarify that detection of aging effects will monitor accessible structures on a frequency not to exceed 5 years consistent with the frequency for implementing the requirements of RG 1.127.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.39
	Enhance the RG 1.127, Inspection of Water-Control Structures Associated With Nuclear Power Plant Program to perform periodic sampling, testing, and analysis of ground water chemistry for pH, chlorides, and sulfates on a frequency of at least every 5 years.			
	Enhance the RG 1.127, Inspection of Water-Control Structures Associated With Nuclear Power Plant Program acceptance criteria to include quantitative acceptance criteria for evaluation and acceptance based on the guidance provided in ACI 349.3R.			
29	Implement the Selective Leaching Program as described in LRA Section B.1.40.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.40
30	Enhance the Structures Monitoring Program to clarify that the scope includes the following:	Prior to November 1, 2024	GNRO- 2011/00093	B.1.42
	<ul> <li>a) In-scope structures and structural components.</li> <li>Containment Building (GGN 2)</li> <li>Control House – Switchyard</li> <li>Culvert No. 1 and drainage channel</li> <li>Manholes and Ductbanks</li> <li>Radioactive Waste Building Pipe Tunnel</li> </ul>	2024		•
	b) In-scope structural components			
	<ul> <li>Anchor bolts</li> <li>Anchorage / embedments</li> <li>Base plates</li> <li>Basin debris screen and grating</li> </ul>			
	Battery racks     Beams, columns, floor slabs and interior walls     Cable tray and cable tray supports			
	<ul> <li>Cable tray and cable tray supports</li> <li>Component and piping supports</li> <li>Conduit and conduit supports</li> </ul>			
	<ul> <li>Containment sump liner and penetrations</li> <li>Containment sump structures</li> <li>Control room ceiling support system</li> </ul>			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
	Cooling tower drift eliminators			
	Cooling tower fill			
	CST/RWST retaining basin (wall)			
30	Diesel fuel tank access tunnel slab			
(cont.)	Drainage channel			
(COIII.)	Drywell floor slab (concrete)			
	Drywell wall (concrete)			
	Ductbanks			
	Electrical and instrument panels and enclosures			]
	Equipment pads/foundations			1
	Exterior walls			
	Fan stack grating			
	Fire proofing			
	Flood curbs			
	<ul> <li>Flood retention materials (spare parts)</li> </ul>			
	<ul> <li>Flood, pressure and specialty doors</li> </ul>			
	Floor slab			
	Foundations			+
	HVAC duct supports			
	Instrument line supports			
,	<ul> <li>Instrument racks, frames and tubing trays</li> </ul>			
	Interior walls			
	Main steam pipe tunnel			
	Manholes			
	<ul> <li>Manways, hatches, manhole covers, and hatch</li> </ul>			
	covers			
	Metal siding			
	Missile shields			
	Monorails     Departmention and least (flood, modiation)			
	Penetration sealant (flood, radiation)     Penetration slopyed (machanical slopyed)			
	Penetration sleeves (mechanical/ electrical not penetrating primary containment boundary)			
	penetrating primary containment boundary)			
	<ul><li>Pipe whip restraints</li><li>Pressure relief panels</li></ul>			
	Pressure relief panels     Reactor pedestal			
}	Reactor pedestal     Reactor shield wall (steel portion)			
	Reactor shield wall (steel portion)     Roof decking			
]	Roof decking     Roof hatches			
	Roof matches     Roof membrane			
	Roof fleribrane     Roof slabs			
	RPV pedestal sump liner and penetrations			
	Seals and gaskets (doors, manways and			
	hatches)			
	Seismic isolation joint			
	Stairway, handrail, platform, grating, decking,			
	- Stanway, Handran, Platform, grating, decking,			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
30 (cont)	<ul> <li>and ladders</li> <li>Structural bolting</li> <li>Structural steel, beams columns, and plates</li> <li>Sumps and Sump liners</li> <li>Support members: welds; bolted connections; support anchorages to building structure</li> <li>Support pedestals</li> <li>Transmission towers (see Note 1)</li> <li>Upper containment pool floor and walls</li> <li>Vents and louvers</li> </ul>			
	Note 1: The inspections of these structures may be performed by the transmission personnel. However, the results of the inspections will be provided to the GGNS Structures Monitoring Program owner for review.			
	c) Clarify the term "significant degradation" to include "that could lead to loss of structural integrity".			
	<ul> <li>d) Include guidance to perform periodic sampling, testing, and analysis of ground water chemistry for pH, chlorides, and sulfates on a frequency of at least every 5 years.</li> </ul>			
	Enhance the Structures Monitoring Program to clarify that parameters monitored or inspected include:	·		
	a) inspection for missing nuts for structural connections.			
	b) monitoring sliding/bearing surfaces such as Lubrite plates for loss of material due to wear or corrosion, debris, or dirt. The program will be enhanced to include monitoring elastomeric vibration isolators and structural sealants for cracking, loss of material, and hardening.			
	Enhance the Structures Monitoring Program to clarify that detection of aging effects will:			
	a) include augmented inspections of vibration isolators by feel or touch to detect hardening if the vibration isolation function is suspect.			
	b) Require inspections every 5 years for structures and structural components within the scope of license renewal unless technical justification is provided to extend the inspection to a period not			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
30 (cont)	to exceed 10 years.  Enhance the Structures Monitoring Program acceptance criteria by prescribing acceptance criteria based on information provided in industry codes, standards, and guidelines including NEI 96-03, ACI 201.1R-92, ANSI/ASCE 11-99 and ACI 349.3R-96. Industry and plant-specific operating experience will also be considered in the development of the acceptance criteria.			
31	Enhance the Water Chemistry Control – Closed Treated Water Program to provide a corrosion inhibitor for the engine jacket water on the enginedriven fire water pump diesel in accordance with industry guidelines and vendor recommendations.  Enhance the Water Chemistry Control – Closed Treated Water Program to provide periodic flushing of the engine jacket water and cleaning of heat exchanger tubes for the engine-driven fire water pump diesel in accordance with industry guidelines and vendor recommendations.  Enhance the Water Chemistry Control – Closed Treated Water Program to provide testing of the engine jacket water for the engine-driven fire water pump diesels at least once per refueling cycle.	Prior to November 1, 2024	GNRO- 2011/00093	B.1.44

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
31 (cont.)	Enhance the Water Chemistry Control – Closed Treated Water Program to conduct inspections whenever a boundary is opened for the following systems.			
	Drywell chilled water (DCW – system P72)		ı	
	Plant chilled water (PCW – system P71)		ı	
	Diesel generator cooling water subsystem for Division I and II standby diesel generators		,	
	Diesel engine jacket water for engine-driven fire water pump		f	
	Diesel generator cooling water subsystem for Division III (HPCS) diesel generator			
	Turbine building cooling water (TBCW-system P43)			
	Component cooling water (CCW – system P42)			
	These inspections will be conducted in accordance with applicable ASME Code requirements, industry standards, and other plant-specific inspection and personnel qualification procedures that are capable of detecting corrosion or cracking.			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
31 (cont.)	Enhance the Water Chemistry Control – Closed Treated Water Program to conduct inspections whenever a boundary is opened for the following systems.			
	Drywell chilled water (DCW – system P72)			
	Plant chilled water (PCW – system P71)			
	Diesel generator cooling water subsystem for Division I and II standby diesel generators			
	Diesel engine jacket water for engine-driven fire water pump			
	Diesel generator cooling water subsystem for Division III (HPCS) diesel generator			
	Turbine building cooling water (TBCW– system P43)		ı	
	Component cooling water (CCW – systemP42)		ı	
	These inspections will be conducted in accordance with applicable ASME Code requirements, industry standards, and other plant-specific inspection and personnel qualification procedures that are capable of detecting corrosion or cracking.			
	standards, and other plant-specific inspection and personnel qualification procedures that are capable			

Enclosure 1 to

GNRO-2011/00093

**License Renewal Application** 

## Enclosure 2 to

GNRO-2011/00093

Appendix A Updated Final Safety Analysis Report Supplement

## Enclosure 3 to

GNRO-2011/00093

Appendix B Aging Management Programs and Activities

### Enclosure 4 to

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Appendix C Response to BWRVIP Applicant Action Items

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Appendix D Technical Specifications Changes

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