



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 12, 2013

Mr. Kevin Mulligan  
Vice President, Site  
Entergy Operations, Inc.  
P.O. Box 756  
Port Gibson, MS 39150

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
GRAND GULF NUCLEAR STATION, LICENSE RENEWAL APPLICATION (TAC  
NO. ME7493) – SET 49.

Dear Mr. Mulligan:

By letter dated October 28, 2011, Entergy Operations, Inc., submitted an application pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Part 54, to renew the operating license, NPF-29, for Grand Gulf Nuclear Station, Unit 1, for review by the U.S. Nuclear Regulatory Commission (NRC) staff. The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information (RAIs), outlined in the Enclosure, were discussed with Ted Ivy, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3873 or by e-mail at [john.daily@nrc.gov](mailto:john.daily@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "John Daily".

John Daily, Senior Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-416

Enclosure:  
Requests for Additional Information

cc w/encl: Listserv

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GRAND GULF NUCLEAR STATION  
LICENSE RENEWAL APPLICATION  
REQUESTS FOR ADDITIONAL INFORMATION

**RAI 3.0.5-1c**

Background

In response to RAI 3.0.5-1b, the applicant stated that its programmatic activities for identifying and reporting age-related operating experience are consistent with the guidance in License Renewal Interim Staff Guidance, LR-ISG-2011-05, "Ongoing Review of Operating Experience."

Issue

- (a) The applicant stated that it will use the corrective action program (CAP) codes "CA" and "EO" to identify operating experience concerning age-related degradation applicable to the plant. LR-ISG-2011-05 states that code(s) should be used specifically for the identification of age-related items. However, per the definitions provided in response to RAI 3.0.5-1a, the codes "CA" and "EO" are used to identify trends and equipment problems involving aging or "other issues." The intended application of these codes is unclear because they may be used to identify non-age-related items along with age-related items.
- (b) The applicant stated that it reports its own age-related operating experience to the industry based on the guidelines in INPO 12-009 "INPO Consolidated Event System." LR-ISG-2011-05 states that specific guidelines should be established for reporting plant-specific operating experience on age-related degradation and aging management. However, the operating experience reporting criteria listed in INPO 12-009, Chapter 2, either are not specific to aging or only cover limited situations involving aging. As such, these criteria are not comprehensive and do not cover all age-related operating experience that may warrant reporting.

Request

Address these items for demonstrating consistency with the guidance in LR-ISG-2011-05:

- (a) Provide revised definitions for codes "CA" and "EO" to clarify that their intended application is for the identification of age-related items, or describe other code(s) that will be used specifically for this purpose.
- (b) Describe specific guidelines for identifying circumstances in which plant-specific operating experience involving age-related degradation and aging management will be reported to the industry.

Alternatively, justify why the operating experience review activities provide for the adequate consideration of operating experience involving age-related degradation and aging management to maintain the effectiveness of the aging management programs (AMPs) and activities.

ENCLOSURE

Identify any necessary enhancements to existing activities based on the response to this request. Provide the schedule for implementing these enhancements and a justification if implementation is later than the date when the renewed operating license is scheduled to be issued, if approved.

### **RAI 3.0.5-1d**

#### Background

LRA Section A.0.1, as amended most recently by letter dated April 15, 2013, provides the UFSAR supplement summary description of the ongoing operating experience review activities.

#### Issue

The applicant's response to RAI 3.0.5-1a (in a letter dated November 29, 2012), states that the operating experience review activities include:

- review of revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," as a source of industry operating experience; and
- evaluation of age-related operating experience items based on consideration of affected plant systems, structures, and components; materials; environments; aging effects, aging mechanisms; AMPs; and the activities, criteria, and evaluations integral to the elements of the AMPs.

The summary description in LRA Section A.0.1 does not address these activities.

#### Request

Revise LRA Section A.0.1 to include a description of the activities identified above. Otherwise, provide a justification for not including such a description in the UFSAR supplement.

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john.daily@nrc.gov

emmanuel.sayoc@nrc.gov

david.drucker@nrc.gov

david.wrona@nrc.gov

melanie.wong@nrc.gov

yaira.diaz-sanabria@nrc.gov

dennis.morey@nrc.gov

rich.smith@nrc.gov,

blake.rice@nrc.gov

greg.pick@nrc.gov

david.mcintyre@nrc.gov