



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

September 18, 2013

EA-13-058

Mr. Kevin Mulligan
Vice President, Operations
Grand Gulf Nuclear Station
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION - INSPECTION REPORT NO.
05000416/2013201 AND NOTICE OF VIOLATION

Dear Mr. Mulligan:

The purpose of this letter is to provide you with the final results of the apparent violation identified in the U.S. Nuclear Regulatory Commission (NRC) Inspection Report No. 05000416/2013201, dated June 11, 2013. A copy of this inspection report is available under the Agencywide Documents Access and Management System (ADAMS) Accession No. ML13133A229.

A predecisional enforcement conference (PEC) was conducted at NRC headquarters in Rockville, MD on July 16, 2013, with you and members of the Entergy Operations, Inc. (Entergy) staff to discuss Entergy's position on the completeness and accuracy of information provided to the NRC in responses to requests for additional information (RAIs) associated with the Grand Gulf Nuclear Station's license renewal application. Additionally, you and members of your staff participated in a teleconference on August 1, 2013, to discuss follow-up information requested by the NRC during the PEC. A summary of the PEC and the teleconference is available under ADAMS Accession No. ML13238A396. By letter dated August 8, 2013, you also provided additional information related to issues discussed during the teleconference (ADAMS Accession No. ML13221A272).

Based on the staff's evaluation of information outlined in subject inspection report and the information that you subsequently provided during the PEC and teleconference, the NRC has determined that a violation of NRC requirements occurred. It is our conclusion that Entergy failed to provide complete and accurate information in accordance with paragraph 54.13(a) of Title 10 of the *Code of Federal Regulations* (10 CFR) when it responded to RAIs B.1.22-1, B.1.22-2, and B.1.41-3 on May 25, 2012.

By letter dated October 28, 2011, Entergy submitted a license renewal application for the Grand Gulf Nuclear Station pursuant to 10 CFR 54.17(a). In the application, Entergy described its aging management programs, including the Service Water Integrity program and the Flow-Accelerated Corrosion (FAC) program, and stated that both programs were consistent with corresponding programs described in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report."

Based on an audit performed during the week of January 23, 2012, the NRC staff issued several RAIs to Entergy in order to obtain sufficient information to complete its review of the

Service Water Integrity and FAC programs. As described in our letter dated June 11, 2013, the NRC staff questioned the accuracy of the information in Entergy's responses to RAIs B.1.22-1, B.1.22-2, and B.1.41-3, based on conflicting information collected by staff during its January 2012 audit. As a result, NRC staff issued additional RAIs in order to assess whether the aforementioned aging management programs were consistent with the GALL Report. Based on the subsequent RAI responses, the NRC staff identified that Entergy provided incomplete and inaccurate information to the NRC staff in its responses to RAIs B.1.22-1, B.1.22-2, and B.1.41-3 on May 25, 2012.

This issue was viewed as potentially significant because it impacted the NRC's ability to perform its regulatory function during the review of the Grand Gulf Nuclear Station's license renewal application. The NRC utilizes the information provided by license renewal applicants to make informed decisions regarding the adequacy of the aging management programs described in their applications and judge whether these programs can support an additional 20 years of plant operations. Escalated enforcement was considered for this violation, in accordance with the Enforcement Policy, because the inaccurate RAI responses provided by Entergy resulted in the NRC staff expending significant resources to determine the adequacy of the Grand Gulf Nuclear Station's aging management programs. In addition, the staff noted Entergy's conclusion that the underlying issues related to the RAI responses would have no potential impact to the effectiveness of the associated aging management programs. Instead, the staff ultimately concluded that each example potentially had adverse effects on the associated aging management program. After a comparison of the details of this case with NRC's actions with respect to previous cases involving incomplete and inaccurate information in licensing action submittals, the NRC determined that this violation is most appropriately characterized at Severity Level IV.

The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject administrative inspection report. Although this violation meets the NRC Enforcement Policy criteria to disposition it as a non-cited violation, the NRC is issuing the enclosed Notice of Violation to emphasize the importance of providing complete and accurate information to the NRC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In addition, you are requested to correct, on the docket, the information concerning the pinhole leak in FAC Item 662, noted in Attachment 3 of your letter dated August 8, 2013, based on the subsequent discussions between your staff and the NRC. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

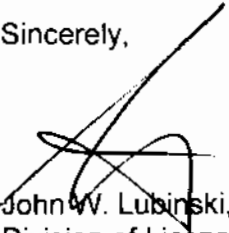
K. Mulligan

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If you have any questions concerning this matter, please contact James A. Gavula of my staff at (630) 829-9755.

Sincerely,



John W. Lubinski, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-416

License No. NPF-29

Enclosure:
Notice of Violation

K. Mulligan

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If you have any questions concerning this matter, please contact James A. Gavula of my staff at (630) 829-9755.

Sincerely,

/RA/

John W. Lubinski, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-416

License No. NPF-29

Enclosure:
Notice of Violation

ADAMS Accession No. ML13239A398

*concurring via email

OFFICE	LA:RPB2:DLR*	PM:RAPB:DLR	BC:RAPB:DLR	EC:IPAB:DIRS
NAME	IKing	JGavula	SBloom	MHalter
DATE	9/18/13	9/17/13	9/17/13	9/17/13
OFFICE	DDD:RIV:DRS	BC:EB:DE	D:DLR	
NAME	JClark	NHilton	JLubinski	
DATE	9/18/13	9/17/13	9/18/13	

OFFICIAL RECORD COPY

Letter to K. Mulligan From J. Lubinski dated September 18, 2013

SUBJECT: GRAND GULF NUCLEAR STATION - INSPECTION REPORT NO.
05000416/2013201 AND NOTICE OF VIOLATION

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NOTICE OF VIOLATION

Entergy Operations, Inc.
Grand Gulf Nuclear Station

Docket No. 50-416
License No. NPF-29
EA-13-058

During the Grand Gulf Nuclear Station (GGNS) license renewal application (LRA) review process, a violation of NRC requirements was identified. In accordance with the U.S. Nuclear Regulatory Commission (NRC) Enforcement Policy, the violation is listed below:

Title 10 of the *Code of Federal Regulation* (CFR) 54.13(a) states, in part, that information provided to the Commission by an applicant for a renewed license must be complete and accurate in all material respects.

Contrary to the above, Entergy Operations, Inc. (Entergy) provided information to the NRC, for a renewed license at the GGNS, in responses to several requests for additional information (RAIs) that was not complete and accurate in all material respects, as evidenced by the following examples. The inaccurate information in the RAI responses was material to the NRC because the NRC relies on the information in RAI responses to determine whether the licensee has demonstrated that aging effects will be adequately managed as required by 10 CFR 54.21(a)(3).

- A. By letter dated May 25, 2012 (ML12150A182), Entergy responded to RAI B.1.41-3, by stating:

The GGNS-MS-46 procedure for moderate energy piping is not an aging management program that is necessary or credited to manage the effects of aging for components that are included in the Service Water Integrity program.

The information in the initial RAI response was demonstrated to be inaccurate through Entergy's response to a follow-up RAI, dated October 2, 2012 (ML12277A079), which stated that the inspections in GGNS-MS-46 are ongoing monitoring activities that are credited by the Service Water Integrity program.

- B. By letter dated May 25, 2012 (ML12150A174), Entergy responded to RAI B.1.22-1 by stating:

LRA Section 3.2.2.1.2, "Low Pressure Core Spray," and Section 3.2.2.1.3, "High Pressure Core Spray," ...do not identify wall thinning due to flow-accelerated corrosion ...as an aging mechanism....As a result, wall thinning due to flow accelerated corrosion is not an aging effect requiring management for these systems....No other systems have aging effects being managed by the Flow-Accelerated Corrosion program that were not identified in the LRA.

ENCLOSURE

The information in the initial RAI response was demonstrated to be inaccurate through Entergy's response to a follow-up RAI, dated October 2, 2012 (ML12277A079), which stated that the low-pressure core spray and high-pressure core spray systems contain components that are being managed by the Flow-Accelerated Corrosion program and that this program also manages erosion mechanisms other than flow-accelerated corrosion in other systems.

- C. By letter dated May 25, 2012 (ML12150A174), Entergy responded to RAI B1.22-2 by stating:

A review of program documentation and data from the Fall 2008 and Spring 2010 refueling outages determined that no significant wall thinning has been detected other than the wall thinning documented in the condition reports referenced in the background of this request for information, which had resulted in wall thickness below the minimum acceptable wall thickness. Thus no additional condition reports on significant wall thinning as defined in EN-DC-315 were required to be generated.

The information in the initial RAI response was demonstrated to be inaccurate through Entergy's response to a follow-up RAI, dated October 2, 2012 (ML12277A079), which states that condition reports were not generated for three items during a recent outage due to an incorrect interpretation of procedural requirements.

This is a Severity Level IV violation.

Pursuant to the provisions of 10 CFR 2.201, Entergy Operations, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region IV and a copy to the NRC Resident Inspector at the Grand Gulf Nuclear Station, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; EA-13-058" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action, as may be proper, should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated this 18th day of September 2013