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GNRO-2013/00060

August 28, 2013

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

SUBJECT: Entergy's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)  
Grand Gulf Nuclear Station, Unit 1  
Docket No. 50-416  
License No. NPF-29

- REFERENCES:
1. NRC Order Number EA-12-049, *Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012 (ML12054A735)
  2. Entergy Letter to NRC, *Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying License with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated February 27, 2013 (GNRO-2013/00015, ML13059A316)

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Entergy. Reference 1 was immediately effective and directs Entergy to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan (Reference 2). The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. Should you have any questions regarding this submittal, please contact Mr. Christopher R. Robinson, Licensing Manager, at (601) 437-7326.

I declare under penalty of perjury that the foregoing is true and correct; executed on August 28, 2013.

Sincerely,



KJM/slw

Attachment: Grand Gulf Nuclear Station's First Six Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: U. S. Nuclear Regulatory Commission  
ATTN: Steven A. Reynolds  
Acting Regional Administrator, Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

U. S. Nuclear Regulatory Commission  
Attn: Director, Office of Nuclear Reactor Regulation  
Washington, DC 20555-0001

U. S. Nuclear Regulatory Commission  
ATTN: Mr. Alan Wang, NRR/DORL  
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ATTN: Jessica A. Kratchman  
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NRC Senior Resident Inspector  
Grand Gulf Nuclear Station  
Port Gibson, MS 39150

**Attachment to GNRO-2013/00060**

**Grand Gulf Nuclear Station's First Six Month Status Report for the Implementation of  
Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation  
Strategies for Beyond-Design-Basis External Events**

**Grand Gulf Nuclear Station's  
First Six Month Status Report for the Implementation of Order EA-12-049, Order  
Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-  
Design-Basis External Events**

## 1 Introduction

Grand Gulf Nuclear Station (GGNS) developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

## 2 Milestone Accomplishments

As of August 28, 2013, the following milestone(s) have been completed:

Submit 6 Month Updates – Update 1 (August 2013).

## 3 Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

- Validation:

Walk-through(s) or Demonstration(s): A target completion date has been added to the milestone listing for completion of the walk-through(s). The walk-through(s) will be completed during the FLEX modification implementation outage. This new milestone target date does not impact the Order implementation date.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
<b>Submit 60 Day Status Report</b>	Oct 2012	Complete	N/A
<b>Submit Overall Integrated Plan</b>	Feb 2013	Complete	N/A
<b>Submit 6 Month Updates:</b>			
Update 1	Aug 2013	Complete	N/A
Update 2	Feb 2014	Not Started	No Change
Update 3	Aug 2014	Not Started	No Change
Update 4	Feb 2015	Not Started	No Change
Update 5	Aug 2015	Not Started	No Change
Update 6	Feb 2016	Not Started	No Change
Update 7	Aug 2016	Not Started	Deleted*
<b>Perform Staffing Analysis</b>		Not Started	No Change
<b>Modifications</b>			
Develop Mods (Design Start)	May 2014	Not Started	No Change

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Develop Strategies		In Progress	Nov 2014
Develop Mods (Design Complete)	Nov 2014	Not Started	No Change
Implementation Outage**	Mar 2016	Not Started	No Change
Implement Mods	Dec 2016	Not Started	Mar 2016
<b>On-site FLEX Equipment</b>			
Purchase		In Progress	No Change
Procure		In Progress	No Change
<b>Off-site FLEX Equipment</b>			
Develop Strategies / Contract with RRC		In Progress	No Change
<b>Procedures</b>			
Issue GG FSGs		Not Started	No Change
Create Maintenance Procedures		Not Started	No Change
Procedure Changes Training Material Complete		Not Started	No Change
<b>Training</b>			
Develop Training Plan		Not Started	No Change
Implement Training		Not Started	No Change
<b>Validation / Demonstration</b>	Mar 2016	Not Started	
<b>Submit Completion Report</b>	Dec 2016	Not Started	Aug 2016

\*Deleted due to Completion Report being submitted in August 2016.

\*\*Full compliance since second refueling outage is before 12/31/2016.

#### 4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1).

#### 5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

GGNS expects to comply with the order implementation date and no relief/relaxation is required at this time.

#### 6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan and the status of each item. The U.S. Nuclear Regulatory Commission (NRC) has not issued a draft safety evaluation for GGNS; therefore, there are no open items for the Draft Safety Evaluation identified at this time.

Overall Integrated Plan Open Item	Status
1. Structure, content and details of the Regional Response Center playbooks will be determined.	Not Started

## **7 Potential Draft Safety Evaluation Impacts**

There are no potential impacts to the Draft Safety Evaluation identified at this time.

## **8 References**

The following references support the updates to the Overall Integrated Plan described in this Attachment.

1. "Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013 (GNRO-2013/00015, ML13059A316).
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ML12054A735).