

NRR-PMDAPEm Resource

From: Wang, Alan
Sent: Tuesday, July 29, 2014 3:49 PM
To: SCARBROUGH, RICHARD A (RSCARBR@entergy.com)
Cc: Burkhardt, Janet
Subject: Grand Gulf Nuclear Station, Unit 1, Request for Additional Information Regarding Technical Specification Task Force Traveler (TSTF) - 423 (TAC No. MF3175)
Attachments: Reference Error RAI.docx

Richard,

by letter dated November 8, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13316B024), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) to revise the Grand Gulf Nuclear Station, Unit 1 (GGNS) Technical Specification (TS). Specifically, this LAR proposed adopt changes consistent with TSTF -423, Revision 0, "Technical Specification End States, NEDC-32988-A." The proposed amendment would modify GGNS TS to risk-inform requirements regarding selected Required Action end states. The US Nuclear Regulatory Commission (NRC) staff has reviewed the November 8, 2013, submittal regarding changes to the selected Required end states and has determined that the attached request for additional information is required to complete its review of the amendment request.

This request was discussed with Mr. Richard Scarbrough of your staff on July 29, 2014, and it was agreed that a response would be provided within 30 days from the issuance of this email. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1445 or via e-mail at Alan.Wang@nrc.gov.

Alan B. Wang

Project Manager (Grand Gulf Nuclear Station and River Bend Station)

Nuclear Regulatory Commission

Division of Operating Reactor Licensing

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Recipients:

"Burkhardt, Janet" <Janet.Burkhardt@nrc.gov>

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REQUEST FOR ADDITIONAL INFORMATION
GRAND GULF NUCLEAR STATION, UNIT 1
ENERGY OPERATIONS, INC
ADOPTION OF TSTF-423, REVISION 1
“CHANGE IN TECHNICAL SPECIFICATIONS END STATES (CE NPSD-1186)”

By letter dated November 8, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13316B024), Entergy Operations, Inc. (Entergy, the licensee) submitted a license amendment request (LAR) which proposed changes to the Technical Specifications (TSs) for Grand Gulf Nuclear Station, Unit 1 (GGNS). Specifically, the licensee proposed to adopt U.S. Nuclear Regulatory Commission (NRC)-approved Revision 1 to Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) Change traveler TSTF-423, “Technical Specifications End States, NEDC-32988-A,” dated December 22, 2009.

The licensee’s application proposes changes to end-states associated with several of its TS limiting condition for operations (LCOs) as listed in the application. While working on the application, the NRC staff identified that one of the regulatory guidance documents used in the NRC staff’s regulatory assessment for the TSTF and referenced in the NRC staff’s model SE for the TSTF, has since been superseded and therefore, is not a valid guidance for the adoption of approved TSTF. The issue concerns specific reference to Regulatory Guide (RG) 1.182, “Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants,” in TSTF-423, Revision 1 (ADAMS Accession No. ML093570241) as well as model Safety Evaluation (ADAMS Accession No. ML102730688) for the TSTF, which currently states,

“Regulatory Guide (RG) 1.182, “Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants” (Reference 5), provides guidance on implementing the provisions of 10 CFR 50.65(a)(4) by endorsing the revised Section 11 (published separately) to NUMARC 93-01, Revision 2. The revised Section 11 of NUMARC 93-01, Revision 2, was subsequently incorporated into Revision 3 of NUMARC 93-01 (Reference 6). However, Revision 3 has not yet been formally endorsed by the NRC. The changes in TSTF-423 are consistent with the rules, regulations, and associated regulatory guidance, as noted above.”

While working on the amendment, the NRC staff identified that RG 1.182 was withdrawn since it was determined that the document (RG 1.182) was redundant due to the inclusion of its subject matter in Revision 3 of RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Withdrawal of RG 1.182 was published in Federal Register Notice (FRN) 78 FR 70846, dated, November 27, 2012. The FRN also states that withdrawal of RG 1.182 neither altered any prior or existing licensing commitments based on its use, nor constituted backfitting

as defined in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.109 (the Backfit Rule) and was not otherwise inconsistent with the issue finality provisions in 10 CFR Part 52.

In addition, the NRC staff observed that RG 1.160 endorsed Revision 4A of the Nuclear Management and Resources Council (NUMARC) 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." NUMARC 93-01 provides methods that are acceptable to the NRC staff for complying with the provisions of Section 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," of 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities" The model SE for the TSTF currently refers to the guidance in Revision 2 of the NUMARC 93-01.

Request For Additional Information:

In order to justify adoption of the approved TSTF changes, please confirm that GGNS's current licensing basis adheres to the RG 1.160 guidance and commitment to the updated version of NUMARC 93-01. In addition, confirm that the topical report supporting the TSTF complies with NUMARC 93-01, Section 11, and identify, if any, inconsistencies with this section.