



Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775
Tel 225-381-4374

Eric Olson
Site Vice President

RBG-47499

August 28, 2014

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

SUBJECT: Application for Technical Specification Changes; Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-423, "Technical Specifications End States."
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

- References
- 1 Entergy Letter dated June 13, 2013, Application for Technical Specification Changes; Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-423, "Technical Specifications End States." (RBG-47322)
 - 2 NRC Email dated July 29, 2014, River Bend Station, Unit 1, Request for Additional Information Regarding Technical Specification Task Force Traveler (TSTF) - 423 (TAC No. MF2299)

Dear Sir or Madam:

In Reference 1 Entergy Operations, Inc. (Entergy) submitted a request for an amendment to the Technical Specifications (TS) for River Bend Station (RBS), Unit 1. The proposed amendment modifies the existing Surveillance Requirements (SRs) related to TSTF-423, "Technical Specifications End States."

In Reference 2 the NRC requested additional information. Attachment 1 provides a response to the NRC requested information.

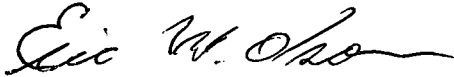
There are no commitments in this letter.

If you have any questions or require additional information, please contact Mr. J. A. Clark at (225) 381-4177

A001
NRR

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 28, 2014.

Sincerely,



EO/JAC/bmb

Attachments:

1. Response to NRC request for additional information

cc: Regional Administrator
U. S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Blvd.
Arlington, TX 76011-4511

NRC Senior Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

U. S. Nuclear Regulatory Commission
Attn: Mr. Alan Wang
MS O-8B1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Department of Environmental Quality
Office of Environmental Compliance
Radiological Emergency Planning and Response Section
JiYoung Wiley
P.O. Box 4312
Baton Rouge, LA 70821-4312

Public Utility Commission of Texas
Attn: PUC Filing Clerk
1701 N. Congress Avenue
P. O. Box 13326
Austin, TX 78711-3326

RBf1-14-0126
LAR 2013-02

Attachment 1

RBG-47499

Response to NRC request for additional information

Request For Additional Information:

In order to justify adoption of the approved TSTF changes, please confirm that RBS'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

Response

River Bend Station committed to follow the guidance established in TSTF-IG-05-02, "Implementation Guidance for TSTF, Revision 2, Technical Specifications End States, NEDC-32988-A," as part of its License Amendment Request, letter RBG-47322 dated June 13, 2013. Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," is listed as a reference in TSTF-IG-05-02 but not otherwise mentioned. TSTF-IG-05-02 requires that plants implementing TSTF-423 must commit to the guidance contained in NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Section 11, for Maintenance Rule risk assessments. As stated in RBG-47322, River Bend Station has previously committed to the guidance of NUMARC 93-01 Section 11, which provides guidance and details on the assessment and management of risk during maintenance. Entergy's processes meet the guidelines of the current NUMARC 93-01 Revision 4A for Maintenance Rule risk assessments. There are no inconsistencies between NUMARC 93-01 and the NRC Safety Evaluation Report for TSTF-423 (letter to BWROG dated September 27, 2002); the NRC SER establishes the requirement to perform risk assessments with respect to performance of the key shutdown safety functions per the Maintenance Rule, 10CFR50.65. The TSTF-423 General Electric topical report, NEDC-32988, notes that RG 1.182 provides guidance for risk assessment and risk management; this information remains valid with RG 1.160 superseding RG 1.182.

Before it was withdrawn in 2012 and superseded by Regulatory Guide 1.160, Regulatory Guide 1.182 had endorsed Section 11 to NUMARC 93-01 as a means to implement 10CFR50.65(a)(4). The previous Revision 2 of Regulatory Guide 1.160 had endorsed NUMARC 93-01 Rev.2, and that endorsement was updated to NUMARC 93-01 Rev.4A as part of Rev.3 dated May 2012. Specifically, section 1.6 through 1.8 of RG 1.182 discusses how Section 11 of NUMARC 93-01 encompass the scope of hazards to be considered during power operations. As stated above, River Bend Station is committed to Section 11 of NUMARC 93-01 and Entergy's processes meet the guidelines of the current NUMARC 93-01 Revision 4A for Maintenance Rule risk assessments.