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Grand Gulf Nuclear Station
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GNRO-2014/00067

September 29, 2014

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

SUBJECT: Request for Additional Information Regarding Request for Adoption of
TSTF-423, Revision 1, Change In Technical Specification End States (CE-
NPSD-1186)
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

REFERENCES: 1. Letter: Grand Gulf Nuclear Station Unit 1, Application for Technical
Specification Changes; Technical Specification Change Task Force
(TSTF) Improved Standard Technical Specification Change Traveler,
TSTF-423, Technical Specification End States (GNRO-2014/00065)
(ML13316B024)
2. NRC Electronic Letter: Grand Gulf Nuclear Station, Unit 1, Request for
Additional Information Regarding Technical Specification Task Force
Traveler (TSTF) – 423 (TAC No. MF3175)

Dear Sir or Madam:

Entergy Operations, Inc. is providing in the Attachment, the response to Reference 2, Request for Additional Information Regarding Technical Specification Task Force Traveler (TSTF) – 423 (TAC No. MF3175). The request for information due date was revised per discussion with the Nuclear Regulatory Commission Project Manager for the Grand Gulf Nuclear Station (GGNS).

This letter contains no new commitments. If you have any questions or require additional information, please contact James Nadeau at 601-437-2103.

Sincerely,

JN/ram

A handwritten signature in cursive script, appearing to read "James Nadeau".

Attachment: Response to Request for Additional Information

cc: (see next page)

cc:

U.S. Nuclear Regulatory Commission
ATTN: Mr. A. Wang, NRR/DORL
Mail Stop OWFN/8 G14
11555 Rockville Pike
Rockville, MD 20852-2378

NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

U. S. Nuclear Regulatory Commission
ATTN: Marc L. Dapas (w/2)
Regional Administrator, Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Attachment to GNRO-2014/00067

Response To Request For Additional Information

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.

Response

In Reference 1, GGNS acknowledged its understanding that Regulatory Guide (RG) 1.182 was withdrawn (77 FR 70846) as the requirements on acceptable methods to meet the provisions of 10 CFR 50.65(a)(4) associated with managing and assessing risk, and further acknowledged our understanding that the requirements were incorporated into RG 1.160. This letter further stated that Procedure EN-WM-104, On Line Risk Assessment, ensures procedural compliance with NUMARC 93-01, Industry Guideline For Monitoring The Effectiveness of Maintenance at Nuclear Power Plants.

Additionally, in Reference 1 GGNS stated that Entergy has reviewed the General Electric topical report (NEDC-32988-A), TSTF-423, and the NRC model Safety Evaluation and concluded that the information in the GE topical report and TSTF-423 as well as the Safety Evaluation prepared by the NRC, are applicable to Grand Gulf Nuclear Station) (GGNS) and provided justification for the incorporation of the proposed changes into the GGNS Technical Specifications.

Subsequently, based on the request for additional information (Reference 2) GGNS reviewed Revision 4a of NUMARC 93-01, Procedure EN-WM-104, Revision 9 and Procedure 01-S-18-6, Revision 13, Risk Assessment of Maintenance Activities and found no exceptions to the guidance contained in Revision 4a of NUMARC 93-01.

However, GGNS is not committing to the Revision 4a of the NUMARC 93-01.