

NRR-PMDAPEm Resource

From: Wang, Alan
Sent: Sunday, January 11, 2015 6:46 PM
To: 'SCARBROUGH, RICHARD A (RSCARBR@entergy.com)'
Cc: Burkhardt, Janet; Blechman, Paula
Subject: Grand Gulf Nuclear Station Request for Additional Information Regarding License Amendment Request For Changing Five Technical Specification Allowable Values (TAC No. MF4693)

Richard,

By Letter dated [August 1, 2014](#) (Agencywide Documents Access and Management System Accession No. ML14216A383), Entergy Operations, Inc. (Entergy, the licensee), submitted a license amendment request (LAR) for the Grand Gulf Nuclear Station, Unit 1 (GGNS). The LAR proposes to modify the Technical Specification (TS) Surveillance Requirements (SRs) to support correction of five non-conservative technical specification allowable values. The revision to the calculations did not result in setpoint changes, only the allowable values are required to be changed.

The US Nuclear Regulatory Commission (NRC) staff has reviewed the [August 1, 2014, LAR](#) and determined that the following additional information is required to complete its review of the amendment request.

- 1) The LAR requests correction of five non-conservative TS allowable values. However, the LAR does not explain how the licensee determined the current allowable values to be non-conservative. Please explain how the current allowable values in the TS are not conservative and therefore, resulted in the need for correcting these values.
- 2) Section 2.1 in the LAR lists the proposed changes for the five TS allowable values, in addition to information regarding the current Allowable Value (AV) identified in the TSs. The NRC staff noted the Current AV for Sys A & B Containment Spray Timers is listed in this section as ≥ 10.25 min. However, the TSs in Attachments 2 and 3 (TS pages) list the Current AV as ≥ 10.26 min. Please explain the inconsistency with the value reported for Sys A & B Containment Spray Timers.
- 3) In Attachment 4 of the LAR, the licensee provided its calculation JC-Q1B21-K114, "Instrument Uncertainty and Setpoint Determination for the System IB21-ADS, Initiation Timer Setpoint Validation." The staff has the following questions regarding this calculation:
 - a. Section 2.0, "Design Requirements," (Sheet 7 of 62) identifies the current Technical Specification AV as ≤ 117 seconds. If the LAR is approved and the changes to the TS are implemented, this value in the Design Requirements section of the calculation will no longer be consistent. What is the plan to revise the Design Requirements to reflect the correct TS allowable value?
 - b. Section 4.4, "1B21CK005A,B, ADS Timer Vendor Data," (Sheet 11 of 62) provides detailed information taken from the vendor data sheets, including accuracy, repeatability, and environmental capabilities. However, this calculation does not provide the vendor data sheets for the automatic depressurization system (ADS) Timers impacted by this calculation included with the LAR. Please identify the specific model of ADS Timer that is being used and provide a copy of the vendor data sheets for this model so staff can verify the specifications used in the calculation are accurate.

- 4) In Attachment 5 of the LAR, the licensee provided its calculation JC-Q1E12-K093, "Instrument Uncertainty and Setpoint Determination for System E12 Containment Spray Actuation Timer." The staff has the following questions regarding this calculation:
- a. Section 2.0, "Design Requirements" (Sheet 6 of 47), identifies the current TS AV as ≥ 10.26 min and ≤ 11.44 min, which are the current AVs before this LAR is approved. If the LAR is approved and the changes to the TS are implemented, these values in the Design Requirements section of the calculation will no longer be consistent. What is the plan to revise the Design Requirements to reflect the correct TS allowable value?
 - b. Sections 7.12, licensee event report (LER) Avoidance System A Loop, and Section 7.13, LER Avoidance System B Loop, (Sheet 20 of 47) calculate the Z value for the LER avoidance for the System A Loop and System B Loop, respectively. The General Electric setpoint methodology identifies a minimum acceptable value for the Z value. However, this section shows the values for System A and System B are below the minimum acceptable Z value for 90% LER avoidance. Please explain the reason for accepting the Z value values for System A and System B.
 - c. Section 4.3, 1E12K093A, B Vendor Data, and Section 4.4, 1E12AK116 Vendor Data, (Sheet 9 and 10 of 47) provides detailed information taken from the vendor data sheets including accuracy, repeatability, and environmental capabilities. There are no copies of the vendor data sheets for the ETR model timers that are impacted by this calculation included with the LAR. Please provide a copy of the vendor data sheets for this model so that staff can verify the information from the vendor data sheets that is used within the calculation is accurate.
- 5) In Attachment 6 of the LAR, the licensee submitted its calculation JC-Q1R21-90024-1, "Division 1 & 2 Degraded 4.16 KV Bus Voltage Setpoint Validation. Section 3.2.4, Uncertainty Effects – Time Delay Relay," (Sheet 9 of 23) provides detail information taken from the vendor data sheets including accuracy and environmental capabilities. However, this calculation does not provide the vendor data sheets for the bistable logic cards and time delay one shot cards that are impacted by this calculation. Please provide a copy of the vendor data sheets for the bistable and time delay cards so that the NRC staff can verify the information from the vendor data sheets that is used within the calculation is accurate.

These Requests for Additional Information were discussed with Mr. Richard Scarbrough on January 5, 2015, and it was agreed that a response would be provided within 60 days of receipt 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.

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