Entergy

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GNRO-2015/00008

January 27, 2015

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

SUBJECT: Response to verbal Request for Additional Information associated with Grand Gulf Nuclear Station Letter GNRO-2013/00065
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

REFERENCE: Letter: Grand Gulf Nuclear Station Unit 1, Application for Technical Specification Changes; Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-423, Technical Specification End States (GNRO-2013/00065) (ML13316B024)

Dear Sir or Madam:

Entergy Operations Inc. (Entergy) is providing it's responses to the verbal request for additional information received from the Nuclear Regulatory Commission on Tuesday, January 20, 2015. The responses are contained in Attachment 1 of this letter and the revised Technical Specification (CLEAN) pages are contained in Attachment 2 of this letter.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 27th day of January, 2015.

Sincerely,

KJM/ram

Attachments: 1. Response to Request For Additional Information

Attachment 1 to GNRO-2015/00008

Response to Request For Additional Information

Grand Gulf Nuclear Station's Responses to Request For Additional Information as received via phone call with the Nuclear Regulatory Commission Project Manager on Tuesday, January 20, 2015.

Item 1)
On Page 3.3-80, Should the line containing "cell containing one or more fuel assemblies" have been indented?

A review of this clean page contained in the submittal and the current page of the Grand Gulf Nuclear Station (GGNS) Technical Specification confirmed this line should have been indented.

The revised page is contained in Attachment 2 of GNRO-2015/00008.

Item 2)
Part A)
Page 3.6-31, Should numbering for the Required Action be C or C.1?

The number should be C.1. A review the clean page, as submitted in GGNS Letter GNRO-2013/00065 found that the number convention used in Required Action C.1 is correct and the Required Action is numbered C.1.

No follow-up actions are warranted.

Part B)
Page 3.6-31, Condition 'D' was added. This new condition contains the following wording: "of condition C not met". Is this just for clarification?

Yes. The intent is to ensure that the user understand which required action was not met.

No follow-up actions are warranted.

Item 3)
Page 3.7-7, Verify the note inserted at Required Action C.1 is correct since Mode 3 is no longer part of the TS?

Yes MODE 3 is applicable to this TS and the note is applicable as requested.

No follow-up actions are warranted.

Item 4)
Page 3.7-3, Should "OR" be underlined, or not?

Yes the "OR" statements should be underlined. A review of the clean page, as submitted in GGNS Letter GNRO-2013/00065, found the "OR" statements are underlined in Condition "F."

No follow-up actions are warranted.

Item 5)
Page 3.7-8, Was the 24 MFC LAR already approved? The 24 MFC LAR was amendment 197. Do we need the change (18 to 24 months) or has it already been approved?

We concur that the requested FREQUENCY change requested for Surveillance Requirement (SR) 3.7.3.3 was addressed by the issuance and implementation of License Amendment 197 and this request change is no longer needed.

The revised page is contained in Attachment 2 of GNRO-2015/00008.

Item 6)
Page 3.7-9, Should the symbol used be a "degrees" symbol?

Yes, this is a degree symbol. A review of the clean page, as submitted in GGNS Letter GNRO-2013/00065, found that the degree symbol is correctly inserted in Required Action B.1.

No follow-up actions are warranted.

Item 7)
Part A)
Page 3.8-4 Action D, Should it be "Systems C Operating" or "Systems-Operating"?

Yes, it should be "Systems–Operating".

No follow-up actions are warranted.

Part B)
Page 3.8-4 Action G, Shouldn't the 36 hours be deleted?

Yes the 36 hour Completion time should be deleted from Condition G

The revised page is contained in Attachment 2 of GNRO-2015/00008.

Item 8)
Page 3.8-27, Top right – is the title correct? Should it be 3.8.1 instead of 3.8.4?

Yes, we agree the title and TS numbering are incorrect on the clean page submitted in GGNS Letter GNRO-2013/00065.

The revised page is contained in Attachment 2 of GNRO-2015/00008.

Item 9)
Page 3.8-39, Top right – is the title correct?

Yes, we agree the title and TS numbering are incorrect on the clean page submitted in GGNS Letter GNRO-2013/00065.

The revised page is contained in Attachment 2 of GNRO-2015/00008.

Attachment 2 to GNRO-2015/00008

Revised (CLEAN) Technical Specification Pages

3.3 INSTRUMENTATION

3.3.8.2 Reactor Protection System (RPS) Electric Power Monitoring

LCO 3.3.8.2 Two RPS electric power monitoring assemblies shall be OPERABLE for each inservice RPS motor generator set or alternate power supply.

APPLICABILITY: MODES 1, 2, and 3,
MODES 4 and 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or both inservice power supplies with one electric power monitoring assembly inoperable.	A.1 Remove associated inservice power supply(s) from service.	72 hours
B. One or both inservice power supplies with both electric power monitoring assemblies inoperable.	B.1 Remove associated inservice power supply(s) from service.	1 hour
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 -------Note-------- LCO 3.0.4.a is not applicable when entering MODE 3. ---------- Be in MODE 3.	12 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two CRFA subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	E.1 -------NOTE------- LCO 3.0.4.a is not applicable when entering MODE 3. ---------- Be in MODE 3.	12 hours
F. Two CRFA subsystems inoperable during OPDRVs. OR One or more CRFA subsystems inoperable due to inoperable CRE boundary during OPDRVs.	F.1 -------NOTE------- LCO 3.0.3 does not apply. ---------- Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Operate each CRFA subsystem for ≥ 10 continuous hours with the heaters operating.	31 days
SR 3.7.3.2	Perform required CRFA filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.3.3	Verify each CRFA subsystem actuates on an actual or simulated initiation signal.	24 months
SR 3.7.3.4	Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. One required offsite circuit inoperable for reasons other than Condition F. AND One required DG inoperable for reasons other than Condition F.	----------NOTE---------- Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems—Operating," when any required division is de-energized as a result of Condition D. ----------		
	D.1	Restore required offsite circuit to OPERABLE status.	12 hours
	OR		
	D.2	Restore required DG to OPERABLE status.	12 hours
E. Two required DGs inoperable.	E.1	Restore one required DG to OPERABLE status.	2 hours OR 24 hours if Division 3 DG is inoperable
F. One automatic load sequencer inoperable.	F.1	Restore automatic load sequencer to OPERABLE status.	24 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, E, or F not met.	G.1	--------NOTE--------- LCO 3.0.4.a is not applicable when entering MODE 3. ---------- Be in MODE 3.	 12 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time for Division 1 or 2 DC electrical power subsystem for condition A, B, or C not met.	D.1 ---------NOTE ----- LCO 3.0.4.a is not applicable when entering MODE 3. ---------- Be in MODE 3.	12 hours
E. Division 3 DC electrical power subsystem inoperable for reasons other than Condition A.	E.1 Declare High Pressure Core Spray System inoperable.	Immediately
F. Required Action and associated Completion Time for Division 3 DC electrical power subsystem for Condition A, B or E not met.	F.1 Be in MODE 3. AND F.2 Be in MODE 4.	12 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.4.1	Verify battery terminal voltage is ≥ 129 V on float charge.	7 days
SR 3.8.4.2	Verify no visible corrosion at battery terminals and connectors. OR Verify battery connection resistance is ≤ 1.5 E-4 ohm for inter-cell connections, ≤ 1.5 E-4 ohm for inter-rack connections, ≤ 1.5 E-4 ohm for inter-tier connections, and ≤ 1.5 E-4 ohm for terminal connections.	92 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 -------NOTE-------- LCO 3.0.4.a is not applicable when entering MODE 3. ---------- Be in MODE 3.	12 hours
D. One or more Division 3 AC or DC electrical power distribution subsystems inoperable.	D.1 Declare High Pressure Core Spray System inoperable.	Immediately
E. Two or more divisions with inoperable distribution subsystems that result in a loss of function.	E.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.7.1	Verify correct breaker alignments and voltage to required AC and DC electrical power distribution subsystems.	7 days