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GNRO-2015/00003

February 9, 2015

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

SUBJECT: Response to Item 25 Request for Additional Information Regarding
"Maximum Extended Load Line Limit Plus" Amendment Request, dated
5/19/2014.
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

- REFERENCES:**
- 1 Electronic Request for Additional Information Regarding "Maximum Extended Load Line Limit Plus" Amendment Request Dated 5/19/2014 (TAC MF2798)
 - 2 Entergy Letter, "Maximum Extended Load Line Limit Analysis Plus (MELLLA+) License Amendment Request," GNRO-2013/00012, dated September 25, 2013 (ADAMS Accession No. ML13269A140).
 - 3 Entergy Letter, "Response to Request for Additional Information Regarding Maximum Extended Load Line Limit Plus Amendment Request," GNRO-2014/00045, dated 8/27/14 (ADAMS Accession No. ML 14239A184).
 - 4 Entergy Letter, "Response to Item 20 Request for Additional Information Regarding MELLLA+ Amendment Request, (GNRO-2014/00088).

Dear Sir or Madam:

Entergy Operations, Inc. is providing in the Attachments a response to the Reference 1 Request for Additional Information (RAI) 25, Item 2. RAI 25, Item 2 discusses Operator Training status and schedule for operating in the MELLLA+ operating domain. All other items with regard to this RAI were previously answered via References 3 & 4.

This letter contains new commitments, which are identified in Attachment 2. If you have any questions or require additional information, please contact Mr. James Nadeau at 601-437-2103.

I declare under penalty of perjury that the foregoing is true and correct; executed on February 9, 2015.

Sincerely,



KJM/ras

- Attachments: 1. Response to RAI 25, Item 2 of the 5/19/14 MELLLA+ LAR Request for Additional Information
2. List of Regulatory Commitments

cc: with Attachments

U.S. Nuclear Regulatory Commission
ATTN: Mr. Marc L. Dapas
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U.S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

State Health Officer
Mississippi Department of Health
P. O. Box 1700
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Attachment 1 to

GNRO-2015/00003

Response to RAI 25, Item 2 of the 5/19/14 MELLA+ LAR Request for Additional Information

RAI 25.0 Simulator Update

2. *Provide the schedule when the GGNS Simulator will be completely updated for operators' training in the MELLLA+ operating domain.*

Response: The GGNS Simulator is currently completely updated for operator's training in the MELLLA+ operating domain. Prior to final MELLLA+ implementation, Grand Gulf Nuclear Station (GGNS) will train all active operating crews to perform all three time-critical operator actions which will be validated prior to MELLLA+ operations. GGNS will test and confirm the operating crew's ability to perform the most time-constrained operator action in less than 90 seconds to ensure that there is time margin available. The results of the simulator testing will be reported to the NRC within 60 days of the completion of testing and will include the full range of response times for each time-critical action, and the average times for each crew. Any failures will be reported to the NRC with a plan for resolution of the discrepancy. Any identified discrepancies will be resolved with the NRC staff before MELLLA+ implementation can start. Additionally, if GGNS decides to make some or all of the time-critical actions "immediate actions", it should be reported to the NRC along with the results of the simulator testing.

**Attachment 2 to
GNRO-2015/00003
List of Regulatory Commitments**

LIST OF REGULATORY COMMITMENTS

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
<p>GGNS will train all active operating crews to perform the following three MELLLA+ time-critical operator actions:</p> <p>Initiate Reactor Water Level Reduction (90 seconds following failure to scram concurrent with no reactor recirculation pumps in service and CTP > 5%).</p> <p>Initiate Standby Liquid Control Injection (300 seconds if CTP > 5% or before Suppression Pool Temperature reaches 110 degrees F).</p> <p>Initiate Residual Heat Removal Suppression Pool Cooling (660 seconds).</p>		✓	Prior to Operation in the MELLLA+ domain
<p>ATWS/Instability Mitigation – Reactor Water Level Reduction Delay:</p> <p>GGNS will train all active operating crews to initiate reactor water level reduction within 90 seconds (as opposed to current GEH analysis of 120 seconds) of recognition of failure to SCRAM concurrent with no reactor recirculation pumps in service and CTP > 5%.</p>		✓	Prior to Operation in the MELLLA+ domain
<p>GGNS will validate that all active operating crews have met the time requirements for the three MELLLA+ time-critical operator actions during evaluated scenarios.</p>		✓	Prior to Operation in the MELLLA+ domain
<p>The results of the three MELLLA+ time-critical operator actions training will be reported to the NRC.</p>	✓		Within 60 days of the completion of training

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
The NRC reported results of the MELLLA+ time-critical operator action training will include the full range of response times for each time-critical action, and the average times for each crew.	✓		Within 60 days of the completion of training
Any ATWS time-critical operator training failures during evaluated scenarios will be reported to the NRC with a plan for resolution.	✓		Within 60 days of the completion of training
GGNS will report any ATWS time-critical actions that are converted to "immediate actions" to the NRC.		✓	Within 60 days of any conversions