

## **NRR-PMDAPEm Resource**

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**From:** Wang, Alan  
**Sent:** Friday, March 27, 2015 9:55 AM  
**To:** 'BURMEISTER, BARRY M'; 'Joseph Clark (JCLARK@entergy.com)'  
**Cc:** Blechman, Paula  
**Subject:** River Bend Station, Unit 1, Request for Additional Information Regarding TSTF - 523 (TAC No. MF4782)

Barry and Joey,

By letter dated September 2, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14261A092), Entergy Operations, Inc. (Entergy, the licensee) submitted a license amendment request (LAR) to adopt Technical Specification Task Force Traveler TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation." The US Nuclear Regulatory Commission (NRC) staff has reviewed the Entergy submittals, regarding changes to adopt TSTF-523 and has determined that the following additional information is required to complete its review of the amendment request:

### **Requests for Additional Information**

1. TSTF-523, Revision 2, has been approved by the Commission, and the licensee stated in Attachment 1 of their submittal that the proposed amendment was consistent with TSTF-523, Revision 2. In Attachment 2 of the submittal, Note 2 associated with Surveillance Requirement (SR) 3.5.2.4 refers to "system flow paths" versus the approved TSTF-523 wording, "system vent flow paths...." The "vent" adjective represents verbiage approved in the TSTF.

Please provide a justification for deviating from the approved TSTF-523 wording or resubmit Attachment 2 so that the language is in consistent with the approved TSTF.

2. In Attachment 1 of the submittal two different revisions of TSTF-523 (i.e., Revisions 1 and 2) were referenced. Currently, Revision 2 of TSTF-523 is the approved version, but Revision 1 is referenced on page 3.

Please clarify the revision of TSTF-523 that was adopted and, if necessary, provide justification for the adoption of the previous revision (i.e., Revision 1), which was not approved by the NRC staff.

3. TSTF-523, Revision 2, has been approved by the Commission, and the licensee stated in Attachment 1 of their submittal that the proposed amendment was consistent with TSTF-523, Revision 2. In Attachment 2 of the submittal, SR 3.5.3.1 uses the phrase "sufficiently full with water" versus the approved TSTF verbiage, "sufficiently filled with water." The wording in the submittal is inconsistent with TSTF-523, other similar SRs that were part of the submittal, and the Technical Specification (TS) bases description for this specific SR in Attachment 3 of the submittal.

Please revise the submittal to be consistent with the approved TSTF-523 language or provide a technical justification for the deviation.

4. TSTF-523, Revision 2, has been approved by the NRC, and the licensee stated in Attachment 1 of their submittal that the proposed amendment was consistent with TSTF-523, Revision 2. In Attachment 2 of the submittal, SR 3.9.9.2 uses the phrase "Verify required RHR shutdown cooling subsystem" versus the approved TSTF verbiage, "Verify RHR shutdown cooling subsystem." The wording in the submittal is inconsistent with TSTF-523 and LCO 3.9.9, which specifies that two trains of RHR shutdown cooling subsystems are required to be OPERABLE.

Please revise the submittal to use language that is consistent with the approved traveler and LCO 3.9.9 or provide a technical justification for the deviation.

5. The following administrative issues were identified in the TS bases that were submitted in Attachment 3 and are being provided for informational purposes.
  - i) The TS bases wording for SR 3.4.9.2 (page 3 of 25) does not correspond to the TS wording in Attachment 2. Specifically, the bases wording states “SR is not required to be performed until 12 hours reactor steam dome pressure” versus the TS wording “SR is not required to be performed until 12 hours after reactor steam dome pressure....” Specifically the word “after” is missing from the bases submittal version.
  - ii) In Attachment 3 (page 7 of 25), the statement “Management of gas voids is important to ECCS injection/spray subsystem OPERABILITY,” which was added to the LCO 3.5.1 bases, is grammatically out of place.
  - iii) In Attachment 3 (page 6 of 25), a left bracket symbol was mistakenly added to the bases description for SR 3.4.10.2.
6. As part of the licensee’s submittal, two new SRs (i.e., SR 3.4.9.2 and SR 3.4.10.2) were proposed to be implemented after refueling outage 19.

Please provide a justification for delaying the implementation of these SRs relative to the other new SRs that are a part of this submittal.

This request was discussed with Mr. Barry Burmeister of your staff on March 24, 2015, and it was agreed that a response would be provided within 30 days from the issuance 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](mailto:Alan.Wang@nrc.gov).

Alan B. Wang

Project Manager (River Bend Station)

Nuclear Regulatory Commission

Division of Operating Reactor Licensing

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