



Entergy Operations, Inc.
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Kevin Mulligan
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Grand Gulf Nuclear Station
Tel. (601) 437-7500

GNRO-2015/00024

May 6, 2015

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

SUBJECT: Request for Additional Information Regarding Application To Revise Technical Specifications To Adopt Technical Specification Task Force (TSTF) TSTF-522, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month"
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

REFERENCE:

1. Letter: Grand Gulf Nuclear Station Unit 1, Application To Revise Technical Specifications To Adopt TSTF-522, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month" (GNRO-2014/00078) (ML14351A059)
2. NRC Electronic Letter: Grand Gulf Nuclear Station, Unit 1, Request for Additional Information Regarding Technical Specification Task Force Traveler (TSTF) – 522 (Dated April 1, 2015) (TAC No. MF5504)

Dear Sir or Madam:

Entergy Operations, Inc. is providing in the Attachment 1, the response to Reference 2, Request for Additional Information Regarding Technical Specification Task Force Traveler (TSTF) – 522.

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

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Mississippi Official.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 6th day of May, 2015.

Sincerely,



KJM/ram

Attachments: 1. Response to Request for Additional Information
 2. Revised Page 1 of Attachment 1 of Letter GNRO-2014/00078

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

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SRC		ALL OSRC Approved License Amendment Requests

Attachment 1 to GNRO-2015/00024
Response To Request For Additional Information

Request for Additional Information

RAI - 1

The LAR states that the justifications presented in the TSTF-522 Traveler and the model Safety Evaluation (SE) prepared by the U.S. Nuclear Regulatory Commission (NRC) staff are applicable to Grand Gulf Nuclear Station, Unit 1 (GGNS).

The NRC guidance in the model SE states that at least 15 continuous minutes of ventilation system operation with heaters every 31 days is acceptable for those plants that test ventilation system charcoal adsorption at a relative humidity of less than 95 percent. The model SE also states that plants that test ventilation system absorption at a relative humidity of 95 percent do not require heaters for the ventilation system to perform its specified safety function. Based on the TS Program and Manuals, Section 5.5.7 "Ventilation Filter Testing Program (VFTP), the SGTS is an Engineered Safety Feature (ESF) filter ventilation system and it contains charcoal adsorbers. However, the VFTP and the GGNS Updated Final safety Analysis Report (UFSAR) indicate that there are no charcoal adsorbers in the CRFA. Therefore, it is not clear to the NRC staff the correlation between the LAR for the CRFA and the adoption of TSTF-522 or to the NRC staff's model SE for the TSTF. Please provide the safety basis for the heaters in the CRFA and additional information to support the requested TS change for the CRFA.

Response

System Design Criteria SDC-Z51 Rev 002 Section 4.15.4 describes the Heaters as it relates to the Control Room Fresh Air (CRFA) Subsystem of the Z51 System. The standby fresh air units is equipped with heating elements to reduce the relative humidity of incoming air at 95 degrees Fahrenheit from 100 percent to 70 percent. The heater controls is designed to minimize malfunction and is shielded from upstream and downstream components so as to not pose a potential source of ignition to the adsorbent. Air flow is required to be established prior to the heating coils being energized.

The charcoal adsorbers are no longer installed in the CRFA Subsystems because the intake air is filtered through charcoal adsorbers installed in the Safeguard Switchgear and Battery Room Outside Air Intake system.

Based on the System Design Criteria, the LAR is acceptable to adopt for the Control Room Fresh Air Subsystem of the Z51 System. The 15 minutes of operation with the Heater energized is sufficient to meet the Ventilation Filter Test Program and the Updated Final Safety Analysis Report. The Heaters are installed upstream of where the charcoal filters were installed, and GGNS would be testing the adsorption of the charcoal filters at a relative humidity of less than 95 percent. Since the charcoal filters have been removed, it is acceptable to still apply the Safety Evaluation and TSTF-522 Traveler to the CRFA Subsystem.

Request for Additional Information

RAI – 2:

Section 2.2, Optional Changes and Variations, in Attachment 1 to the LAR states the following:

“Entergy **is not** proposing any variations or deviations from the TS changes described in the in the TSTF-522, Revision 0, or the applicable parts of the NRC staff’s model safety evaluation dated September 13, 2012. Entergy **is** proposing the following variations from the TS changes described in the in the TSTF-522, Revision 0, or the applicable parts of the NRC staff’s model safety evaluation dated September 13, 2012.”

Please clarify the apparently conflicting statements above and provide any additional information if the second part of the paragraph were to be applicable.

Response:

The second sentence contained in Attachment 1, “Description of Assessment,” of GNRO-2014/00078 was part of the generic format for Section 2.2 provided in TSTF-522. The submittal developer failed to remove this sentence during the submittal preparation process prior to the license amendment request being submitted to the NRC. This page was revised to remove this sentence from the section. The revised page is attached to this letter in Attachment 2 for NRC consideration.

Request for Additional Information

RAI – 3:

Attachment 4 to the LAR provides a mark-up of the proposed changes to TS Bases for staff information. The staff suggests that Bases changes related to SR 3.7.3.1 be modified to convey a better understanding of the intended information.

Response

Entergy reviewed the wording to ensure clarity of the bases pages for SR 3.7.3.1 and has concluded no changes are required.

Attachment 2 to GNRO-2015/00024

Revised Page 1 of Attachment 1 of Letter GNRO-2014/00078

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed change revises the Surveillance Requirements which currently require operating ventilation systems with the heaters operating for a continuous 10 hour period every 31 days. The Surveillance Requirements are revised to require operation of the systems for 15 continuous minutes every 31 days.

The proposed amendment is consistent with TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to operate for 10 hours per Month."

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy has reviewed the model safety evaluation dated September 13, 2012 as part of the Federal Register Notice for Comment. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-522. As described in the subsequent paragraphs, Entergy has concluded that the justifications presented in the TSTF-522 proposal and the model safety evaluation prepared by the NRC staff are applicable to GGNS Unit 1 and justify this amendment for the incorporation of the changes to the GGNS TS.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the TS changes described in the TSTF-522, Revision 0, or the applicable parts of the NRC staff's model safety evaluation dated September 13, 2012.

3.0 REGULATORY ANALYSIS


3.1 No Significant Hazards Consideration Determination

GGNS Unit 1 requests adoption of an approved change to the standard technical specifications (STS) and plant specific technical specifications (TS), to revise Technical Specification (TS) 3.6.4.3, "Standby Gas Treatment (SGT) System," and TS 3.7.4, "[Control Room Air Conditioning (AC) System," in the BWR/6 SGT System and CRFA System with the electric heaters operating for a continuous 10 hour period every 31 days. The Surveillance Requirement is revised to require operation of the systems for 15 continuous minutes every 31 days.

As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 13
		INFORMATIONAL USE		
NRC Correspondence				

ATTACHMENT 9.4

NRC SUBMITTAL REVIEW

Sheet 1 of 2

{Typical}

Letter #: GNRO2015/00024

Response Due: May 1, 2015

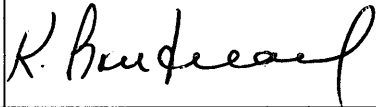

Subject: Request for Additional Information Regarding Application To Revise Technical Specifications To Adopt TSTF-522, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month"

Date Issued for Review: April 2, 2015

Correspondence Preparer / Phone #: Richard Meister/6685

Section I

Letter Concurrence and Agreement to Perform Actions

POSITION / NAME	Action (concurrence, certification, etc.)	Signature (sign, interoffice memo, e-mail, or telecom)
Wesley Johnson Engineering	Certification	See Attachment 9.5
Kenneth Boudreaux Engineering	Concurrence	
Mark Goodwin Operations	Concurrence	


COMMENTS

Response to RAI received on April 1, 2015


Section II

Correspondence Screening

Does this letter contain commitments? If "yes," identify the commitments with due dates in the submittal and in Section III. When fleet letters contain commitments, a PCRS LO (e.g., LO-LAR, LO-WT) should be initiated with a CA assigned to each applicable site to enter the commitments into the site's commitment management system.	Yes No	<input type="checkbox"/> <input checked="" type="checkbox"/>
Does this letter contain any information or analyses of new safety issues performed at NRC request or to satisfy a regulatory requirement? If "yes," reflect requirement to update the UFSAR in Section III.	Yes No	<input type="checkbox"/> <input checked="" type="checkbox"/>

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 13
		INFORMATIONAL USE		
NRC Correspondence				

Does this letter require any document changes (e.g., procedures, DBDs, FSAR, TS Bases, etc.), if approved? If “yes,” indicate in Section III an action for the responsible department to determine the affected documents. (The Correspondence Preparer may indicate the specific documents requiring revision, if known or may initiate an action for review.)	Yes No	<input type="checkbox"/> <input checked="" type="checkbox"/>
Does this letter contain information certified accurate? If “yes,” identify the information and document certification in an attachment. (Attachment 9.5 must be used.)	Yes No	<input checked="" type="checkbox"/> <input type="checkbox"/>

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 13
		INFORMATIONAL USE		
NRC Correspondence				

ATTACHMENT 9.4

NRC SUBMITTAL REVIEW

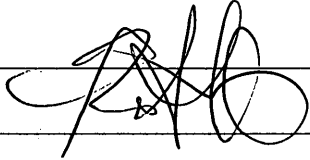
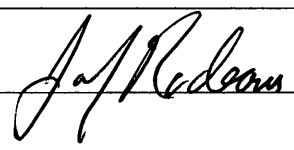
Sheet 2 of 2


Section III

Actions and Commitments

Required Actions	Due Date	Responsible Dept.
<i>Note: Actions needed upon approval should be captured in the appropriate action tracking system</i>		
N/A	N/A	N/A
Commitments	Due Date	Responsible Dept.
<i>Note: When fleet letters contain commitments, a PCRS LO should be initiated with a CA assigned to each applicable site to enter the commitments into the site's commitment management system.</i>		
N/A	N/A	N/A

Section IV Final Document Signoff for Submittal

Correspondence Preparer	Richard Meister/	
Final Submittal Review (optional)	N/A	
Responsible Department Head	James Nadeau/	

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 13
		INFORMATIONAL USE		
NRC Correspondence				

ATTACHMENT 9.5

CERTIFICATION REFERENCE FORM

Sheet 1 of 1

Letter Number: GNRO-2015/00024

Subject: Request for Additional Information Regarding Application To Revise Technical Specifications To Adopt TSTF-522, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month"

Certifiable Statement(s): Use one of the following methods to identify certifiable statements in the table below:

- 1 Identify location in submittal (e.g., page 3, para 2, sentence 1) OR,
- 2 Paste in the exact words of the statement(s) OR,
- 3 State "see attachment" and attach a copy of the correspondence with the certifiable statements indicated (e.g., by redlining, highlighting, or underlining, etc.).

Each statement or section of information being certified should be uniquely numbered to correspond with the supporting documentation listed below.

Objective Evidence or Basis of Peer Review: List the supporting documents in the table below and attach a copy of the documents OR give basis of peer review. Large documents need not be attached.

Certifiable Statement(s)	Objective Evidence or Basis of Peer Review
RAI-1 and RAI-3 Response Statements Contained in Attachment 1 of GNRO-2015/00024	Reference LR-LAR-2014-00226 CAs 8&9

Individual certifying the statement(s): Certification may be documented using e-mail, telecom, "sign off" sheet, or inter-office memorandum. The form of documentation should specifically identify the information being certified.

Patrick Griffith  Sys Eng 4/24/15
 Name Department Date

Peer Review: Prior to signing for certification, determine if a Peer Review is required per section 5.4[2](c). Indicate "N/A" if not required.

N/A
 Name Department Date