



Entergy Operations, Inc.  
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GNRO-2015/00060

October 12, 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

REFERENCES:

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)
3. Letter: Grand Gulf Nuclear Station Unit 1, 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" (GNRO-2015/00024) (ML15127A583)
4. NRC Electronic Letter: Grand Gulf Nuclear Station, Unit 1, Request for  
Additional Information Regarding Technical Specification Task Force  
Traveler (TSTF) – 522 (Dated August 27, 2015) (TAC No. MF5504)

Dear Sir or Madam:

Entergy Operations, Inc. is providing in the Attachment 1, the response to Reference 4, 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 12<sup>th</sup> day of October, 2015.

Sincerely,

A handwritten signature in black ink, appearing to be 'KJM/ram', with a long horizontal stroke and a small loop at the end.

KJM/ram

Attachments: 1. Response to Request for Additional Information

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

**Attachment 1 to GNRO-2015/00060**

**Response To Request For Additional Information**

Request for Additional Information

RAI - 1

The purpose of the heaters in the CRFA filter train are for reducing the relative humidity of the incoming air to the adsorbers from 100 percent to 70 percent. By letter dated May 6, 2015 (ADAMS Accession No. ML15127A583), in response to RAI-1, the licensee stated that charcoal adsorbers were removed from the Control Room Fresh Air (CRFA) filter train. The removal of the charcoal adsorbers was approved by the NRC by Amendment 149 of the Facility Operating License No. NPF-249 for Grand Gulf, Unit 1 as part of the full-scope implementation of an alternative accident source term (ADAMS Accession No. ML010780172), dated March 15, 2001). Since that time, Grand Gulf continued to maintain these heaters in the TS, including that of TS 5.5.7 Ventilation Filter Testing Program, Item e. As the charcoal adsorbers are no longer in existence in the filter train, please provide the safety function of these heaters and the basis, if any, for maintaining the heaters in the TSs. If no such basis exists, please confirm that testing and operation of the heaters has no adverse effects on the CRFA filter trains and the control room air conditioning system.

Response

Grand Gulf Nuclear Station (GGNS) Specification M633.0, Technical Specification for Control Room Standby Fresh Air System, states the safety function of the heaters is to be capable of reducing 4000 cfm of air at 105 F and 100 percent relative humidity to less than 70 percent relative humidity to preclude the fouling of the charcoal adsorbers. The charcoal adsorbers in the Control Room Fresh Air (CRFA) Filter Train were removed through ER-GG-2001-0315, Removal Of Charcoal Filters From Control Room Stand-By Fresh Air Units in OC302 and OC303 and Technical Specification Amendment 145. Therefore there is no longer a safety function of the heaters in the SBFA Filter Train.

There is no basis for maintaining the SBFA heaters in the technical specification based on guidance from NRC Regulatory Guide 1.52 Paragraph C.3.b, which states: 'Control Room Standby Fresh air heaters are not required due to removing requirement for charcoal filters per Technical Specification Amendment 145.'

Based on review of the heater test surveillances and site OE since the charcoal adsorbers were removed, there is no evidence of the currently installed heaters having an adverse effect on the SBFA filter train and the Control Room Air Conditioning System with the charcoal adsorbers not being installed. Grand Gulf OE was searched using keywords '06-EL-SZ51-R-0001,' 'Z51D002A/B,' and 'heaters' since 2001 when the charcoal adsorbers were removed.

Request for Additional Information

**RAI – 2:**

Also, in response to RAI-1, the licensee stated that “the charcoal adsorbers are no longer installed in the CRFA filter train because the intake air is filtered through charcoal adsorbers installed in the Safeguard Switchgear and Battery Room Outside Air Intake System.” The NRC staff reviewed the System P&IDs and descriptions in the Updated Final Safety Analysis Report and did not find any charcoal adsorbers in the outside air intake system. Please confirm the existence of charcoal adsorbers in the Safeguard Switchgear and Battery Room Outside Air Intake System and the relation between the heaters in the CRFA filter train and the charcoal adsorbers in the outside air intake system to the switchgear and battery rooms.

**Response:**

Per GGNS Pipe and Instrument Drawings (P&IDs) M0049 (Control Room HVAC System), M1108A (Safeguard Switchgear & Battery Rooms Ventilation System), ER-GG-2001-0315, and Amendment 145 the charcoal adsorbers have been removed from the CRFA Filter Train. According to the listed P&IDs, there are no charcoal adsorbers in the flow path from the Safeguard Switchgear and Battery Room Outside intake to the SBFA Filter train therefore, the currently installed heaters do not have any impact on a charcoal adsorber.