



Entergy Operations, Inc.  
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GNRO-2015/00077

November 24, 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)
5. 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-2015/00060)
6. Letter: Grand Gulf Nuclear Station, Unit 1, Supplemental Information to the NRC's August 27, 2015, 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-2015/00070)

7. Electronic Correspondence From Nuclear Regulatory Commission Requesting Technical Specification 5.5.5.e Be Revised As Part Of This Amendment Request

Dear Sir or Madam:

Entergy Operations, Inc. (Entergy), based on an electronic correspondence (e-mail) from the Nuclear Regulatory Commission (NRC) Project Manager on Tuesday, November 10, 2015, and a supplemental phone call on Monday November 16, 2015, proposes to remove the Control Room Fresh Air System (CRFA) heater wattage test from Technical Specification 5.5.7.e. Removing the CRFA heater wattage test is consistent with changes proposed for adoption of TSTF-522. In addition, Entergy proposes to revise the Bases for Technical Specification Surveillance Requirement 3.7.8.1 to be consistent with TSTF-522 Bases discussion. A clean copy of both technical specification pages have been attached to this letter for your review.


The heaters for the Control Room Fresh Air System (CRFA) are maintained in the off position. This position prevents them from auto energizing under a normal or emergency start of the CRFA. Additionally, neither the normal or emergency operating procedures call for the heaters to be energized.

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 24<sup>th</sup> day of November, 2015.

Sincerely,

  
For K. J. Mulligan

KJM/ram

Attachment: Clean Copy of Technical Specification Pages 3.7-16a & 5.0-13

cc (continued on page 3):

cc Continued:

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

Dr. Mary Currier, M.D., M.P.H  
State Health Officer  
Mississippi Department of Health  
P.O. Box 1700  
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**Attachment to GNRO-2015/00077**

**Clean Copy of Technical Specification Pages 3.7-16a & 5.0-13**

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers (if used) is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 at the system flowrate specified below  $\pm 10\%$ :

<u>ESF Ventilation System</u>	<u>Delta P</u>	<u>Flowrate</u>
SGTS	9.2" WG	4000 cfm
CRFA	7.2" WG	4000 cfm

- e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below when tested in accordance with ANSI N510-1975 (except for the phase balance criteria stated in Section 14.2.3):

<u>ESF Ventilation System</u>	<u>Wattage</u>
SGTS	48 $\pm$ 5.0 kW

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.8 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the main condenser offgas treatment system and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The program shall include:

- a. The limits for concentrations of hydrogen in the main condenser offgas treatment system and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and

(continued)

BASES (continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.3.1

This SR verifies that a subsystem in a standby mode starts from the control room on demand and continues to operate. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every month provides an adequate check on this system. Operation for  $\geq 15$  continuous minutes demonstrates OPERABILITY of the system. Periodic operation ensures that blockages fan or motor failure, or excessive vibration can be detected for corrective action. Furthermore, the 31 day Frequency is based on the known reliability of the equipment and the two subsystem redundancy available.

SR 3.7.3.2

This SR verifies that the required CRFA testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, and minimum system flow rate. Specific test frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.3.3

This SR verifies that each CRFA subsystem starts and operates and that the isolation valves close in  $\leq 4$  seconds on an actual or simulated initiation signal. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.7.1.1 overlaps this SR to provide complete testing of the safety function. While this Surveillance can be performed with the reactor at power, operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.7.3.4

This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

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