



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 17, 2015

Vice President, Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 - ISSUANCE OF AMENDMENT
RE: ADOPTION OF TECHNICAL SPECIFICATION TASK FORCE TRAVELER
TSTF-522 (CAC NO. MF5504)

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 208 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment consists of changes to the technical specifications (TSs) in response to your application dated December 15, 2014, as supplemented by letters dated May 6, October 12, November 6, and November 24, 2015.

The amendment modifies Surveillance Requirement (SR) 3.6.4.3.1 of TS 3.6.4.3, "Standby Gas Treatment (SBT) System"; SR 3.7.3.1 of TS 3.7.3, "Control Room Fresh Air (CRFA) System"; and TS 5.5.7, "Ventilation Filter Testing Program (VFTP)." The changes to SR 3.6.4.3.1 and SR 3.7.3.1 are consistent with the adoption of Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Traveler TSTF-522, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month." Additionally, the change to TS 5.5.7 which was not addressed in TSTF-522, provides consistency with the above TS changes.

- 2 -

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in cursive script that reads "James S. Kim".

James S. Kim, Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosures:

1. Amendment No. 208 to NPF-29
2. Safety Evaluation

cc w/encls: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY OPERATIONS, INC.

SYSTEM ENERGY RESOURCES, INC.

SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

ENTERGY MISSISSIPPI, INC.

DOCKET NO. 50-416

GRAND GULF NUCLEAR STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 208
License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated December 15, 2014, as supplemented by letters dated May 6, October 12, November 6, and November 24, 2015, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 1

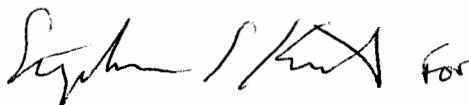
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-29 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 208 are hereby incorporated in the license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "Meena K. Khanna" followed by a small "for" written to the right.

Meena K. Khanna, Chief
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating
License No. NPF-29 and the
Technical Specifications

Date of Issuance: December 17, 2015

ATTACHMENT TO LICENSE AMENDMENT NO. 208

FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

Replace the following pages of the Facility Operating License No. NPF-29 and the Appendix A, Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License

REMOVE

4

INSERT

4

Technical Specifications

REMOVE

3.6-51

3.7-8

5.0-13

INSERT

3.6-51

3.7-8

5.0-13

- (b) SERI is required to notify the NRC in writing prior to any change in (i) the terms or conditions of any new or existing sale or lease agreements executed as part of the above authorized financial transactions, (ii) the GGNS Unit 1 operating agreement, (iii) the existing property insurance coverage for GGNS Unit 1 that would materially alter the representations and conditions set forth in the Staff's Safety Evaluation Report dated December 19, 1988 attached to Amendment No. 54. In addition, SERI is required to notify the NRC of any action by a lessor or other successor in interest to SERI that may have an effect on the operation of the facility.

C. The license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Entergy Operations, Inc. is authorized to operate the facility at reactor core power levels not in excess of 4408 megawatts thermal (100 percent power) in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 208 are hereby incorporated into this license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

During Cycle 19, GGNS will conduct monitoring of the Oscillation Power Range Monitor (OPRM). During this time, the OPRM Upscale function (Function 2.f of Technical Specification Table 3.3.1.1-1) will be disabled and operated in an "indicate only" mode and technical specification requirements will not apply to this function. During such time, Backup Stability Protection measures will be implemented via GGNS procedures to provide an alternate method to detect and suppress reactor core thermal hydraulic instability oscillations. Once monitoring has been successfully completed, the OPRM Upscale function will be enabled and technical specification requirements will be applied to the function; no further operating with this function in an "indicate only" mode will be conducted.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	31 days
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	24 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two CRFA subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	E.1 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 3. ----- Be in MODE 3.	12 hours
F. Two CRFA subsystems inoperable during OPDRVs. <u>OR</u> One or more CRFA subsystems inoperable due to inoperable CRE boundary during OPDRVs.	F.1 -----NOTE----- LCO 3.0.3 does not apply. ----- Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Operate each CRFA subsystem for \geq 15 continuous minutes.	31 days
SR 3.7.3.2 Perform required CRFA filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.7.3.3 Verify each CRFA subsystem actuates on an actual or simulated initiation signal.	24 months
SR 3.7.3.4 Perform required CRE unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.	In accordance with the Control Room Envelope Habitability Program

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)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 208 TO

FACILITY OPERATING LICENSE NO. NPF-29

ENTERGY OPERATIONS, INC., ET AL.

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

1.0 INTRODUCTION

By application dated December 15, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14351A069), as supplemented by letters dated May 6, October 12, November 6, and November 24, 2015 (ADAMS Accession Nos. ML15127A583, ML15285A002, ML15310A324, and ML15329A210, respectively), Entergy Operations, Inc. (Entergy, the licensee), requested changes to the technical specifications (TSs) for Grand Gulf Nuclear Station, Unit 1 (GGNS). The supplemental letters dated May 6, October 12, November 6, and November 24, 2015, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on April 28, 2015 (80 FR 23603).

The licensee requested to adopt NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Change Traveler TSTF-522, "Revise Ventilation System Surveillance Requirements (SRs) to Operate for 10 hours per Month," dated March 30, 2010 (ADAMS Accession No. ML100890316). Adopting TSTF-522 would revise the existing SRs from requiring operating the ventilation system for at least 10 continuous hours with the heaters operating every 31 days to require at least 15 continuous minutes of ventilation system operation every 31 days.

Specifically, the licensee proposed changes to TSs 3.6.4.3 "Standby Gas Treatment (SGT) System", 3.7.3 "Control Room Fresh Air (CRFA) system" and TS 5.5.7 "Ventilation Filter Testing Program (VFTP)." In particular SR 3.6.4.3.1 of TS 3.6.4.3 and SR 3.7.3.1 of TS 3.7.3, currently require that each of the SGT and CRFA subsystems be operated for greater than or equal to 10 continuous hours with heaters operating at a frequency of 31 days. The licensee proposes to reduce the operating time required to demonstrate the system operability from greater than or equal to 10 continuous hours to greater than or equal to 15 continuous minutes.

In addition, for the CRFA subsystem, the licensee requested to remove the heater operability requirement in SR 3.7.3.1 and the heater wattage testing requirement in TS 5.5.7. The operability requirement for the heater in SR 3.6.4.3.1 for the SGT subsystem remains unaffected by the proposed change. The surveillance frequency of 31 days for SRs 3.7.3.1 and 3.6.4.3.1 is also unaffected by the proposed change.

The licensee stated that the license amendment request is consistent with the NRC-approved Traveler TSTF-522. The availability of this TS improvement was announced in the *Federal Register* on September 20, 2012 (77 FR 58421), as part of the consolidated line item improvement process.

2.0 REGULATORY EVALUATION

One of the reasons air filtration and adsorption systems are required at nuclear power plants is to lower the concentration of airborne radioactive material that may be released from the site to the environment as a result of a design-basis event. Lowering the concentration of airborne radioactive materials can mitigate doses to plant operators and members of the public in the event of a design-basis event. A typical system consists of ventilation ductwork, fans, dampers, valves, instrumentation, prefilters or demisters, high efficiency particulate air (HEPA) filters, heaters, and activated charcoal adsorbers. These systems are tested by operating the systems and monitoring the response of the overall system, as well as individual components. Laboratory tests of charcoal adsorbers are also performed to ensure the charcoal adsorbs an acceptable amount of radioactive gasses.

Current testing requirements for the air filtration and adsorption systems state that the systems should be operated for at least 10 continuous hours with heaters operating every 31 days. These requirements are based on NRC staff guidance for testing air filtration and adsorption systems that has been superseded. New NRC staff guidance states at least 15 continuous minutes of ventilation system operation with heaters operating every 31 days is acceptable for those plants that test ventilation system adsorption at a relative humidity of less than 95 percent. Plants that test ventilation system adsorption at a relative humidity of 95 percent do not require heaters for the ventilation system to perform its specified safety function and the bracketed phrase, "with heaters operating," is not included in the SRs.

The regulatory requirements for design and testing of these systems are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.67, "Accident source term," and 10 CFR Part 100, Reactor Site Criteria," as well as 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," General Design Criterion (GDC) 19, "Control room"; GDC 41, "Containment atmosphere clean-up"; GDC 42, "Inspection of containment atmosphere cleanup systems"; GDC 43, "Testing of containment atmosphere cleanup systems"; GDC 61, "Fuel storage and handling and radioactivity control."

NRC Regulatory Guide (RG) 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants" (ADAMS Accession No. ML003740139), was published in March 1978 to provide guidance and criteria acceptable to the NRC staff for licensees to implement the regulations in 10 CFR related to air filtration and adsorption systems.

Regulatory Position 4.d of Revision 2 of RG 1.52 stated that "Each ESF [engineered safety feature] atmosphere cleanup train should be operated at least 10 hours per month, with the heaters on (if so equipped), in order to reduce the buildup of moisture on the adsorbers and HEPA filters." The purpose of this position is to minimize the moisture content in the system and thereby enhance efficiency in the event the system is called upon to perform its design basis function. The current Bases in NUREG-1434, "Standard Technical Specifications - General Electric BWR [Boiling Water Reactor]/6 Plants," Revision 4.0, Volume 2, dated April 2012 (ADAMS Accession No. ML12104A196), explains that operation of heaters for 10 hours for General Electric Plants would eliminate moisture on the charcoal adsorbers and HEPA filters. Subsequently, the NRC staff was informed that 10 continuous hours of system operation would dry out the charcoal adsorber for a brief period of time, but following heater de-energization, the level of moisture accumulation in adsorbers would rapidly return to the pre-test level. The NRC staff found this information persuasive and subsequently issued NRC Generic Letter (GL) 99-02: "Laboratory Testing of Nuclear-Grade Activated Charcoal" dated June 3, 1999 (ADAMS Accession No. ML082350935), and errata sheet dated August 23, 1999 (ADAMS Accession No. ML031110094). GL 99-02 requested licensees to confirm their charcoal testing protocols accurately reflect the adsorber gaseous activity capture capability. GL 99-02 also requested the licensees to account for the effects of moisture accumulation in adsorbers.

Therefore, the NRC staff updated RG 1.52 in June 2001, to include the new information (ADAMS Accession No. ML011710176). RG 1.52, Revision 3, Regulatory Position 6.1 states, "[e]ach ESF atmosphere cleanup train should be operated continuously for at least 15 minutes each month, with the heaters on (if so equipped), to justify the operability of the system and all its components."

One of the reasons for the previous 10-hour requirement for ventilation system operation with heaters operating was to minimize the effects of moisture on the adsorber's ability to capture gaseous activity. However, these effects would already be accounted for in the VFTP, if testing were performed at a relative humidity of 95 percent and in such cases heaters would not be necessary. RG 1.52, Revision 3, Regulatory Position 6.1 states, "[s]ystems with humidity control can perform laboratory testing of representative samples of activated carbon at a relative humidity of 70%, and systems without humidity control should perform laboratory testing of representative samples of activated carbon at a relative humidity of 95%...." The GGNS TS 5.5.7 "Ventilation Filter Testing Program (VFTP)" under item "e" requires testing of charcoal adsorbers in the SGT system at a relative humidity of 70 percent and under item "e" requires a demonstration of heater capacity. As noted in Regulatory Position 4.9 and in Notes (3) and (4) to Table 1 "Laboratory Tests for Activated Carbon" in RG 1.52, Revision 3, heaters are an allowed means to control relative humidity at less than or equal to 70 percent relative humidity. For SR 3.7.4.1 for CRFA system, the licensee stated that charcoal adsorbers have been removed from the filter trains. Since heater operability in CRFA system is no longer necessary, the licensee proposed to remove the wording related to heater operability from SR 3.7.4.1 and the heater testing requirement from TS 5.5.7 "Ventilation Filter Testing Program", item e. The following technical evaluation section contains further staff evaluation of heater operability in CRFA.

The NRC's regulatory requirements related to the content of the TS are contained in 10 CFR 50.36, "Technical specifications." The regulations at 10 CFR 50.36 require that the TS include items in the following categories: (1) safety limits, limiting safety systems settings, and limiting control settings; (2) limiting conditions for operations (LCOs); (3) SRs; (4) design

features; and (5) administrative controls. SRs are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, facility operation will be within safety limits, and the LCOs will be met.

The NRC's guidance for the format and content of General/Electric BWR/6 licensee TSs can be found in NUREG-1434, "Standard Technical Specifications General Electric BWR/6 Plants, Revision 4.0, Volume 1 (ADAMS Accession No. ML12104A195).

3.0 TECHNICAL EVALUATION

3.1 TS 3.6.4.3 "Standby Gas Treatment (SGT) System"

SR 3.6.4.3.1 currently states:

Operate each SGT subsystem for ≥ 10 continuous hours with heaters operating.

The surveillance frequency is 31 days.

The licensee proposed to change the SR as follows (licensee application dated December 15, 2014):

Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.

The surveillance frequency remains at 31 days.

The NRC staff evaluated the licensee's proposed change against the applicable regulatory guidance in RG 1.52, Revision 3; guidance in NUREG-1434, as modified by TSTF-522; and the regulatory requirements of 10 CFR 50.36.

The proposed change would require at least 15 minutes of system operation. The NRC staff found that the proposed change is consistent with Regulatory Position 6.1 in RG 1.52, Revision 3.

The NRC staff evaluated the licensee's proposed change against the applicable regulatory guidance in NUREG-1434, as modified by TSTF-522. The proposed change adopts the TS format and content, to the extent practicable, contained in the changes made to NUREG-1434 by TSTF-522. Accordingly, the NRC staff found that the proposed change is consistent with guidance in NUREG-1434, as modified by TSTF-522.

The NRC staff compared the proposed change to the existing SR, as well as the regulatory requirements of 10 CFR 50.36. The existing SR provides assurance that the necessary quality of ventilation systems and components will be maintained and that the LCOs will be met. The proposed change reduces the amount of required system operational time from 10 hours to 15 minutes. The 10-hour operational requirement for heaters was based on the concept of minimizing/eliminating moisture in the adsorbers and thus ensure the adsorbers were better able to capture gaseous activity.

As discussed in Section 2.0 of this SE, the effects of moisture on the adsorber's ability to capture gaseous activity are now accounted for in the licensee's VFTP by performing testing at a relative

humidity of 95 percent, in which case, heaters would not be necessary or by performing testing at a relative humidity of 70 percent, in which case, heaters or some other means of controlling relative humidity would be required. For GGNS, the SGT subsystem filter trains are equipped with electric heaters and TS 5.5.7, "Ventilation Filter Testing Program" requires filter testing at 70 percent relative humidity and demonstration of heater capacity. Since the SR is no longer relied upon to dry out the adsorbers, the 10-hour heater operational requirement is unnecessary. The NRC staff concluded that reducing the required minimum system operation time to 15 minutes, with heaters operating, is consistent with RG 1.52, Revision 3, and in conjunction with the VFTP, is sufficient to justify operability of the system and all its components. The NRC staff concludes that the proposed change to SR 3.6.4.3.1 meets the regulatory requirements of 10 CFR 50.36 because it provides assurance that the necessary quality of ventilation system and components, including the heater, will be maintained and that the LCO will be met. Therefore, the NRC staff concludes the proposed change is acceptable.

3.2 TS 3.7.3 "Control Room Fresh Air (CRFA) System" and TS 5.5.7 "Ventilation Filter Testing Program (VFTP)"

SR 3.7.3.1 currently states:

Operate each CRFA subsystem for ≥ 10 continuous hours with the heaters operating.

The surveillance frequency is 31 days.

The licensee proposed to change the SR as follows (licensee supplemental information letter dated November 6, 2015):

Operate each CRFA subsystem for ≥ 15 continuous minutes.

The surveillance frequency remains at 31 days.

TS 5.5.7 Ventilation Filter Testing Program, item "e", requires demonstration of heater capacity, stating in part:

<u>ESF Ventilation System</u>	<u>Wattage</u>
SGTS	48 ± 5.0 kw
CRFA	20.7 ± 2.1 kw

By letter dated November 24, 2015, the licensee proposed to delete the line containing "CRFA" and " 20.7 ± 2.1 kw" from item "e".

By letter dated March 14, 2010 (ADAMS Accession No. ML010780172), the NRC staff issued Amendment No. 145, approving the full-scope implementation of alternative source term (AST) for GGNS. GGNS was the lead pilot plant for implementing an AST at operating power plants. The licensee reevaluated the control room habitability with the application of the AST and concluded that the radiological consequences to the control room operator resulting from the postulated loss-of-coolant accident are within the 5 rem total effective dose equivalent (criterion specified in 10 CFR 50.67. The evaluation took no credit for iodine removal by the CRFA

system. The charcoal adsorbers were removed from the CRFA system filter train and the testing requirement for the charcoal adsorbers was also removed from TS 5.5.7 "Ventilation Filter Testing Program," Item "c." However, the TSs retained the requirements to demonstrate the heater operability as required by SR 3.7.3.1 and the heater capacity as required by Item "e" of TS 5.5.7. In its letter dated October 12, 2015, the licensee confirmed that the charcoal adsorbers were removed from the CRFA filter train (as a result of Amendment 145) and that the heaters no longer have a safety function. By letter dated November 24, 2015, the licensee stated that the heaters are maintained in the off position and this position prevents them from auto energizing under normal or emergency start of the CRFA. In addition, the licensee stated that neither the normal nor emergency operating procedures call for the heaters to be energized.

Since the CRFA filter trains do not have charcoal adsorbers, the NRC staff concludes it is acceptable to delete the word "with heaters operating" from SR 3.7.3.1. For operability determination of remaining components in CRFA filter train, reducing the operating time from greater than or equal to 10 continuous hours to greater than or equal to 15 minutes, has already been considered and found acceptable by TSTF-522 and as reflected in NUREG-1434, Revision 4.0, Volume 1. Therefore, the NRC staff concludes the proposed changes to SR 3.7.3.1 are acceptable.

The licensee has confirmed that with the charcoal adsorbers removed, the heaters in CRFA filter trains have no safety function and that the heaters are maintained in the off position, thus, preventing auto energization. Based on this information, the NRC staff concludes it is acceptable to remove the CRFA heaters from the capacity wattage test required by item "e" of TS 5.5.7.

3.3 Technical Specification Bases

The regulations at 10 CFR 50.36 state, in part:

"A summary statement of the bases or reasons for such specifications ... shall also be included in the application, but shall not become part of the technical specifications."

The licensee may make changes to the TS Bases without prior NRC staff review and approval in accordance with TS 5.5.11, "Technical Specifications (TS) Bases Control Program." Accordingly, along with the proposed TS changes, the licensee also submitted TS Bases changes corresponding to the proposed TS changes. The NRC staff determined that TS Bases changes are consistent with the proposed TS changes and provide the purpose for each requirement in the specification consistent with the Commission's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 2, 1993 (58 FR 39132).

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Mississippi State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding published in the *Federal Register* on April 28, 2015 (80 FR 23603). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: N. Karipineni

Date: December 17, 2015

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

James S. Kim, Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosures:

1. Amendment No. 208 to NPF-29
2. Safety Evaluation

cc w/encls: Listserv

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RidsRgn4MailCenter Resource		RidsNrrLAPBlechman Resource	RidsNrrDssScvb Resource
NKaripineni, NRR			

ADAMS Accession No. ML15336A256

***by memorandum dated**

OFFICE	NRR/DORL/LPL4-2/PM	NRR/DORL/LPL4-2/PM	NRR/DORL/LPL4-2/LA	NRR/DSS/SCVB/BC*
NAME	AWang	JKim	PBlechman	RDennig
DATE	12/7/2015	12/7/2015	12/7/2015	11/24/2015
OFFICE	NRR/DSS/STSB/BC	OGC - NLO	NRR/DORL/LPL4-2/BC	NRR/DORL/LPL4-2/PM
NAME	RElliott	DRoth	MKhanna (S.Koenick for)	JKim
DATE	12/8/2015	12/14/2015	12/17/2015	12/17/2015

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