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GNRO-2016/00052

September 23, 2016

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

SUBJECT: Clarification of Grand Gulf Nuclear Station Containment Leak Rate Program
Description
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

REFERENCE: 1. NRC Correspondence to Entergy GNRI 2016/00088, "Question to GGNS
Regarding LRA B1.1.15," dated September 21, 2016

Dear Sir or Madam:

Entergy Operations, Inc. is providing, in Attachment 1, a clarification to the License Renewal Application (LRA) as requested in Reference 1. This document is being provided to support review of the Grand Gulf Nuclear Station (GGNS) LRA Safety Evaluation Report (SER).

This letter contains no new commitments.

If you have any questions or require additional information, please contact James Nadeau at (601) 437-2103.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23rd day of September, 2016.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Fallacara".

VF/sas

Attachment: 1. Clarification of GGNS Containment Leak Rate Program Description

cc: (See Next Page)

cc: U.S. Nuclear Regulatory Commission
ATTN: Mr. Jim Kim, NRR/DORL (w/2)
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U.S. Nuclear Regulatory Commission
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Division of Radiological Health
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NRC Senior Resident Inspector
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Port Gibson, MS 39150

Attachment 1 to

GNRO-2016/00052

Clarification of GGNS Containment Leak Rate Program Description

On February 17, 2016, the NRC staff approved (ADAMS Accession No. ML16011A247) a Grand Gulf license amendment request (ADAMS Accession No. ML15147A599) to adopt NEI 94-01, Revision 3-A, subject to specific conditions and with partial implementation of ANSI/ANS 56.8-2002, "Containment System Leakage Testing Requirements," as the implementing document for Type B and Type C leak rate testing (LRT). Based upon the NRC acceptance of the Grand Gulf license amendment, changes are warranted to the Grand Gulf Containment Leak Rate Program descriptions in license renewal application (LRA) sections A.1.15 and B.1.15. The license amendment does not alter the conclusion that the Containment Leak Rate Program elements are consistent with the corresponding program elements described in NUREG-1801 Section XI.S4. However, a change to the LRA is warranted to clarify the documents that provide the guidelines for implementing the Grand Gulf Containment Leak Rate Program.

See changes to A.1.15 and B.1.15 shown below. Additions are shown with underline and deletions with strikethrough.

A.1.15 Containment Leak Rate Program

The Containment Leak Rate Program provides for detection of loss of material, cracking, and loss of function in various systems penetrating containment. The program also provides for detection of age-related degradation in material properties of gaskets, O-rings, and packing materials for the primary containment pressure boundary access points.

Containment leakage rate tests (LRT) are performed to assure that leakage through the containment and systems and components penetrating primary containment does not exceed allowable leakage limits specified in the plant technical specifications. Types A, B and C leakage rate testing will be implemented in accordance with the criteria set forth in RG 1.163, NEI 94-01, Revision 3-A, and ANSI/ANS-56.8-2002, which are guidelines for acceptable leak rate testing programs. An integrated leak rate test (~~LLRT~~Type A) is performed during a period of reactor shutdown. ~~at the frequency specified in 10 CFR Part 50, Appendix J, Option B, based upon the criteria in Regulatory Guide 1.163, NEI 94-01, and ANSI 56.8-1994.~~ Performance of the integrated leak rate test per 10 CFR Part 50, Appendix J demonstrates the leak-tightness and structural integrity of the containment. Local leak rate tests (~~LLRT~~ Type B and C) are performed on isolation valves and containment access penetrations. ~~at Test frequencies that for Types A, B and C leakage rate testing comply with the requirements of 10 CFR Part 50, Appendix J, Option B, based upon the criteria in NEI 94-01, Revision 3-A.~~

B.1.15 Containment Leak Rate

Program Description

The Containment Leak Rate Program is an existing program that provides for detection of loss of material, cracking, and loss of function in various systems penetrating containment. The program also provides for detection of age-related degradation in material properties of gaskets, o-rings, and packing materials for the primary containment pressure boundary access points.

Containment leakage rate tests (LRT) are performed to assure that leakage through the containment and systems and components penetrating primary containment does not exceed allowable leakage limits specified in the plant technical specifications. Types A, B and C leakage rate testing will be implemented in accordance with the criteria set forth in RG 1.163, NEI 94-01, Revision 3-A, and ANSI/ANS-56.8-2002, which are guidelines for acceptable leak rate testing programs. An integrated leak rate test (~~ILRT~~Type A) is performed during a period of reactor shutdown. ~~at the frequency specified in 10 CFR Part 50, Appendix J, Option B, based upon the criteria in Regulatory Guide 1.163, NEI 94-01, and ANSI 56.8-1994.~~ Performance of the integrated leak rate test per 10 CFR Part 50, Appendix J demonstrates the leak-tightness and structural integrity of the containment. Local leak rate tests (~~LLRT~~Type B and C) are performed on isolation valves and containment access penetrations. at Test frequencies that for Types A, B and C leakage rate testing comply with the requirements of 10 CFR Part 50, Appendix J, Option B, based upon the criteria in NEI 94-01, Revision 3-A.