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GNRO-2017/00027

April 26, 2017

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

SUBJECT: Entergy Operations Inc. Intent to Submit a License Amendment Request to Implement Tornado Missile Risk Evaluator and Request for Pilot Plant Status  
Grand Gulf Nuclear Station, Unit 1  
Docket No. 50-416  
License No. NPF-29

Dear Sir or Madam:

This letter is to inform the Nuclear Regulatory Commission (NRC) of Entergy Operations Inc. (Entergy) intent to have the Grand Gulf Nuclear Station (GGNS) Unit 1 become a pilot plant for the use of a risk-informed methodology known as the Tornado Missile Risk Evaluator (TMRE). TMRE will be used to demonstrate tornado missile protection compliance. As part of the pilot program, Entergy will submit a license amendment request for approval to use TMRE at GGNS Units 1.

The Nuclear Energy Institute (NEI) and the industry have been developing a new methodology to evaluate the risk associated with tornado missiles on identified unprotected components. TMRE is a new methodology as defined in 10 CFR 50.59, requiring NRC prior review and approval on a plant-specific basis. Licensees would be able to submit a license amendment request to use TMRE and to bring these unprotected components into tornado missile protection compliance if NRC approves the submitted request.

The purpose of TMRE is to present the NRC with a Regulatory Guide (RG) 1.174 risk-informed option for evaluating the risk posed by tornado missiles at any site and determine whether additional physical protection is warranted. The need for TMRE originated with NRC's issuance of Regulatory Issue Summary (RIS) 2015-06, which informed licensees of several instances of plants that were identified as not being in conformance with their tornado missile licensing basis. This risk-informed methodology may be a platform for resolving low risk compliance issues and improve risk-informed regulations.

Entergy requests that the review fees associated with the NRC evaluation of this license amendment request be waived pursuant to 10 CFR 170.11 on the basis that the request is to assist in developing NRC regulatory guidance to endorse implementation of TMRE in accordance with 10 CFR 170.11 (b). It is Entergy's understanding that the fee waiver would be applicable to the complete NRC review of a GGNS license amendment request.

The current target date for this submittal is 4<sup>th</sup> quarter 2017. Entergy respectfully requests a decision on the request for pilot plant status and fee waiver as soon as practicable to support timely and efficient preparation of the license amendment request. This letter contains no NRC commitments. If you have any questions, please contact James Nadeau at 601-437-2103.

Sincerely,



Eric A. Larson  
Site Vice President  
Grand Gulf Nuclear Station

EAL/ram  
cc:

U.S. Nuclear Regulatory Commission  
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U. S. Nuclear Regulatory Commission  
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NRC Senior Resident Inspector  
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