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

May 23, 2018

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 – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE: ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-425, REVISION 3 (EPID L-2018-LLA-0106)

Dear Sir or Madam:

By letter dated April 12, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18102B445), Entergy Operations, Inc. (Entergy) submitted a license amendment request (LAR) for Grand Gulf Nuclear Station, Unit 1 (GGNS). The proposed amendment would modify the GGNS technical specifications (TS) by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specification Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

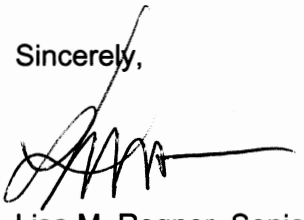
In order to make the application complete, the NRC staff requests that Entergy supplement the application to address the information requested in the enclosure by June 11, 2018. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review

pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in the letter were discussed with Mr. Douglas Neve of your staff on May 15 and 17, 2018.

If you have any questions, please contact me at 301-415-1906 or via e-mail at Lisa.Regner@nrc.gov.

Sincerely,



Lisa M. Regner, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosure:
Supplemental Information Needed

cc: Listserv

SUPPLEMENTAL INFORMATION NEEDED

LICENSE AMENDMENT REQUEST REGARDING APPLICATION FOR

TECHNICAL SPECIFICATION CHANGE REGARDING RISK-INFORMED JUSTIFICATION FOR

THE RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS

ENTERGY OPERATIONS, INC

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NOS. 50-416

By letter dated April 12, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18102B445), Entergy Operations, Inc. submitted a license amendment request (LAR) for the Grand Gulf Nuclear Station, Unit 1 (GGNS). The proposed amendment would modify the GGNS technical specifications (TSs) by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Technical Specifications Task Force (TSTF) Traveler TSTF-425, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b," Revision 3, in accordance with Nuclear Energy Institute (NEI) 04-10, Revision 1, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."

The U.S. Nuclear Regulatory Commission (NRC) staff performed an acceptance review of the LAR in accordance with the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-109, Revision 2, "Acceptance Review Procedures," dated January 16, 2017 (ADAMS Accession No. ML16144A521), and determined that the application is unacceptable for review with opportunity to supplement because it is missing a significant analysis and, therefore, is lacking completeness of scope. The following information should be included in the license's supplement to the LAR to allow the NRC to begin its review.

Request for Supplemental Information

The process outlined in NEI 04-10 ensures that surveillance frequencies are sufficient to assure that the requirements of Title 10 of the *Code of Federal Regulations* Section 50.36, "Technical specifications," are satisfied. The guidance in NEI 04-10 addresses the technical adequacy of the probabilistic risk assessment (PRA) by conforming to the peer review and self-assessment processes in Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," Revision 2 (ADAMS Accession No. ML090410014). This regulatory guide provides one approach acceptable to the NRC for determining the technical adequacy of the PRA model. Regulatory Guide 1.200 endorses, with certain clarifications and qualifications, the American Society of Mechanical Engineers (ASME)/American Nuclear Society (ANS) RA-Sa 2009, Addendum A to ASME RA-S-2008 "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications" (i.e., the PRA Standard). Section 4.2, "Licensee Submittal Documentation," of RG 1.200 states, in part, that the application should discuss the resolution of the peer review facts and observations (F&Os) that are applicable to the parts of the PRA required for the application. During a peer review, the documentation of differences or deficiencies between the licensee's PRA model and the NRC-endorsed industry

PRA standards are generally labeled as F&Os. Appendix X to NEI 05-04, NEI 07-12, and NEI 12-13, "Close-out of Facts and Observations (F&Os)" (ADAMS Accession No. ML17086A451), as accepted by the NRC in a letter dated May 3, 2017, "U.S. Nuclear Regulatory Commission Acceptance on Nuclear Energy Institute Appendix X to Guidance 05-04, 07-12, and 12-13, Close-out of Facts and Observations" (ADAMS Accession No. ML17079A427), provides guidance to licensees for closing F&Os that were opened during the peer review process.

In the letter dated May 3, 2017, the NRC staff states, in part, that "in order for the NRC to consider the F&Os closed so that they need not be provided in submissions of future risk-informed licensing applications, the licensee should adhere to the guidance in Appendix X in its entirety. Following the guidance in Appendix X will reinforce the NRC staff's confidence in the F&O closure process and potentially obviate the need for a more in-depth review."

The NRC observed GGNS's process for review and closure of F&Os on August 23-25, 2017, at Jackson, MS. The observations were limited to the onsite review; however, as stated in the Appendix X guidance, the onsite review and associated "consensus process, as described in the body of this document, should be followed during which the full team present on the day of the associated consensus session considers and reaches consensus on adequacy of closure of each finding." The guidance in Appendix X permits remote reviews (i.e., via web and teleconference connection to the onsite team), but only for a limited number of findings. The guidance in Appendix X also permits evaluating and crediting post onsite closure work by the licensee but then requires a re-review of the licensee resolution and associated documentation and separate consensus session. As detailed in the observation report (ADAMS Accession No. ML17356A055), the NRC observers could not conclude that the licensee fully adhered to the endorsed guidance in conducting the F&O closure audit.

Therefore, as specified in the letter dated May 3, 2017, in order for the NRC to review the technical adequacy of GGNS PRA with regard to Risk-Informed Technical Specification Initiative 5b, the LAR must be supplemented by the F&Os and associated resolutions and conclusion, or the LAR must be supplemented by the following information demonstrating that the licensee adhered to the guidance in Appendix X in its entirety:

a. Appendix X, Section X.1.3, "Close Out F&Os by Independent Assessment," outlines the necessary qualifications for members of the independent assessment team:

   - Provide justification that addresses the number of reviewers for the F&O closure process is a function of the scope and number of findings F&Os to be reviewed for closure.

   - Provide evidence that supports how every member of the independent assessment group meets the relevant peer reviewer qualifications as stated in the ASME/ANS PRA Standard for all technical elements associated with the F&Os reviewed.

   - Provide evidence that supports two qualified reviewers addressed each F&O.

b. Appendix X, Section X.1.3, "Close Out F&Os by Independent Assessment," "On-site Review," states, in part, that "the team will determine if the finding can be closed-out via consensus, referencing the appropriate SRs [supporting

requirements] of the ASME/ANS PRA Standard for the review criteria," and that "the team will review the SR to ensure that the aspects of the underlying SR that were previously not met, or met at CCI, are now met, or met at CCII."

- Demonstrate that the independent assessment team reviewed the SR(s) to ensure that Capability Category (CC) II was met for all F&Os. This evidence should include some examples of the documented evaluations and conclusions.

c. Appendix X, Section X.1.3, "Close Out F&Os by Independent Assessment," "Post-review Activities," states, in part, that the final report will include: "for each F&O, assessment of whether the resolution was determined to be a PRA upgrade, maintenance update, or other, and the basis for that determination."

- Confirm the independent assessment team has provided a written basis for all F&Os to validate whether each finding constituted a PRA upgrade, maintenance update or other, as defined in the ASME/ANS PRA standard. Provide examples of the documented evaluations and conclusions.

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ADAMS Accession No: ML18138A468 *** by email dated**

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA	NRR/DRA/APLA(BC)
NAME	LRegner	PBlechman	SRosenberg*
DATE	05/23/18	05/22/18	05/17/18
OFFICE	NRR/DORL/LPL4/BC	NRR/DORL/LPL4/PM	
NAME	RPascarelli	LRegner	
DATE	05/22/18	05/23/18	

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