



**ENTERGY**

**Entergy Operations, Inc.**

P.O. Box 756  
Port Gibson, MS 39150  
Tel 601 437 2800

March 24, 1994

**C. R. Hutchinson**  
Vice President  
Operations  
Grand Gulf Nuclear Station

U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
10 Year ASME Code Meeting

GNRO-94/00047

Gentlemen:

We are requesting your attendance at a meeting to discuss our cost beneficial licensing action (CBLA) request which proposes an alternative to the 10CFR50.55a requirements to adopt the latest approved ASME code edition every 10 year period.

As you know, we met with the technical staff on December 6, 1993 to review our 10/21/93 submittal and supplemented our proposal with a further submittal on 12/9/93. Although we left the meeting on December 6 with the agreement that the staff would quickly docket any additional questions, we have since been informed that the review staff has no further questions. Therefore, we believe the technical staff has a good understanding of our proposal. Unfortunately, NRC management was unable to attend the December meeting.

Our CBLA request raises fundamental policy questions which go beyond the proposed alternative to 10CFR50.55a. We believe the resolution of these questions may shape the future nature, value and scope of the CBLA program. Because we feel that the CBLA program is approaching a crossroads, we believe it important that NRC management and technical staff have a common understanding of the key elements of our proposal and that Entergy Operations have the opportunity to discuss our view of the broader issues.

Based on feedback during and subsequent to the December 6 meeting, it appears that the review staff concerns focus in two main areas: 1) the use of PRA as a basis for making safety decisions, and 2) the likelihood that many of the ASME code changes will not meet a substantial safety benefit test. These concerns could be raised for many of our CBLA requests and involve substantial policy issues which we believe NRC management has already addressed or is in the process of addressing. We discuss our views, in brief, below.

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### Use of PRA

At Entergy Operations and in some areas of the NRC, probabilistic risk assessment coupled with engineering judgment has become a standard tool in resolving a wide range of safety issues. It is particularly useful in providing a measure of the relative importance of a system, component, issue or proposed change.

Much of our effort in the area of regulatory burden reduction employs PRA as a critical component. For instance, as a pilot in the pending graded QA effort, both the ANO and Grand Gulf plants will be using the Maintenance Rule risk ranking of systems along with further PRA refinements to fundamentally re-grade the Q-list rankings of plant components.

For our alternative to 10CFR50.55a, we propose to use PRA as one element to determine if a particular ASME code change constitutes a substantial safety benefit. As we presented on December 6, this decision criterion will be more conservative than those derived from the criteria published in NUREG/BR-0058 Rev 2, Regulatory Analysis Guidelines of the NRC. Specifically, we will determine that a substantial safety benefit exists based on a change in core damage frequency of greater than  $10^{-6}$  and/or a change in containment release probability of greater than  $10^{-7}$ .

During our December 6 meeting, the staff raised a number of good issues which have prompted some changes in and clarifications of our original submittal. We did not make clear our intention to employ criteria in addition to PRA to determine substantial safety benefit. We intend to use an expert panel process not unlike that used to identify the structures, systems and components important to Maintenance Rule implementation. This panel will be responsible for reviewing the probabilistic screening results and ensuring that appropriate deterministic and engineering discipline criteria are considered in the final determination of safety benefit for a given ASME code change. In addition, the proposed program revisions will be reviewed by each plant's on-site review committee. Similarly, if a value/impact analysis is necessary, we intend to base our criteria on those contained in NRC Manual Chapter 0514, paragraph 043 (Regulatory Analysis).

### Degree of Implementation of ASME Code Changes

We agree with the staff that approval of our alternative to 10CFR50.55a will likely result in many individual ASME code changes not being implemented because they do not constitute a substantial safety benefit. In fact, it is because these types of incremental changes often result in little safety benefit, but at a significant cost, that we initiated our request.

The fundamental purpose of Entergy Operations' burden reduction initiatives is to increase flexibility in our allocation of resources. When limited resources must be assigned to functions of lesser safety significance, overall safety suffers. While we expect to achieve cost savings through the CBLA program, more importantly, we

expect to free up resources which can be re-invested in more safety significant activities.

We believe that safety improvement through burden reduction is the basic premise behind the CBLA program. Our proposed alternative to 50.55a is a good example of this principle in action.

Meeting Request

It is our belief that these basic issues, if not adequately aired, will adversely affect the course of the CBLA program.

Consequently, we request a near term meeting with Messrs. Russell, Thadani, Reyes, Virgilio, Sheron, Roe, Zimmerman and the technical review management and staff to explore these issues.

We appreciate your consideration of this request and look forward to your response.

Yours truly,



CRH/MJM/be

cc:

Mr. R. H. Bernhard  
Mr. H. W. Keiser  
Mr. R. B. McGehee  
Mr. N. S. Reynolds  
Mr. H. L. Thomas

Mr. Stewart D. Ebnetter  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N.W., Suite 2900  
Atlanta, Georgia 30323

Mr. William T. Russell  
Director, NRR  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Ashok C. Thadani  
Associate Director, NRR  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

cc:

Mr. Luis A. Reyes  
Acting Associate Director, NRR  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Martin J. Virgilio  
Director, Systems Safety & Analysis  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Brian W. Sheron  
Director, Engineering  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Jack Roe  
Director, Reactor Projects  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Roy P. Zimmerman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. P. W. O'Connor, Project Manager (w/2)  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Mail Stop 13H3  
Washington, D.C. 20555