



December 7, 1990

W. T. Cottle

Vice President
Operations
Grand Gulf Nuclear Station

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

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Withdrawal of PCOL-89/02 -
Light Load Restrictions
AECM-90/0216

Entergy Operations, Inc. submitted by letters dated January 26, 1989 (AECM-89/0001) and May 4, 1990 (AECM-90/0003) a proposed amendment to the Grand Gulf Nuclear Station (GGNS) Technical Specification (TS) which would have required Secondary Containment Integrity when moving certain loads over irradiated fuel assemblies stored in the Spent Fuel Storage areas. The issue associated with the TS change was identified via LER-88/016 (AECM-88/0204) dated October 21, 1988 (interim report) and LER-88/016-01 (AECM-89/0025) dated February 1, 1989 (Final Report).

GGNS identified in LER-88/016 a situation which, without proper controls, may have allowed loads weighing less than 1140 pounds (i.e., "light loads") to be transported over irradiated fuel assemblies without Secondary Containment Integrity. Light loads of sufficient impact energy could result in exceeding 10CFR100 limits if dropped on irradiated fuel assemblies when secondary containment is not set. As corrective action for the condition, GGNS implemented administrative controls which preclude the condition at GGNS, notified the NSSS vendor and advised other industry groups of the potential condition. As supplemental corrective action, a Technical Specification change was sought as final closure of the issue.

Although the Staff has raised no question concerning the technical adequacy of the current administrative controls, the proposed Technical Specification change has resulted in extended discussion over the wording to be employed in the Technical Specification, as well as the generic nature of the issue. By submitting a plant-specific Technical Specification change, it is apparent that GGNS has been attempting to resolve a generic Technical Specification issue which is properly the province of the NRC.

Consequently, and after discussion with the Staff, GGNS hereby withdraws its request (AECM-90/0003) for amendment of the Technical Specifications.

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The safety concerns identified in LER-88/016 have been and will continue to be addressed by GGNS through administrative controls on light load impact energies to assure that, in the unlikely event of a light load drop over irradiated fuel, offsite radiation consequences would be limited to 25% of 10CFR100 limits. We will follow with interest the generic resolution of this issue and would be happy to lend our support.

Yours truly,

W F C

WTC/JOF:mtc

cc: Mr. D. C. Hintz
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