



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST FRANCISVILLE LOUISIANA 70775
AREA CODE 504 635-6034 340-8851

January 7, 1991
RBG- 34273
File Nos. G9.5, G9.42

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Gulf States Utilities Company (GSU) hereby files an application to amend the River Bend Station - Unit 1 Technical Specifications, Appendix A to Facility Operating License NPF-47, pursuant to 10CFR50.90. This application is filed to remove the 31 day administrative limit from Technical Specification Surveillance Requirement 4.4.4.c for the continuous conductivity monitor for the reactor coolant system. The Attachment to this letter and the Enclosure provide the justifications and proposed revisions to the Technical Specifications.

Should you have any questions, please contact Mr. L. L. Dietrich of my staff at (504)381-4866.

Sincerely,

W. H. Odell
Manager - Oversight
River Bend Nuclear Group

LAE/LLD/MSF/pg

Attachment

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cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

Claudia Abbate
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Mr. Glenn Miller
Radiation Protection Division
Louisiana Department of Environmental Quality
Post Office Box 14690
Baton Rouge, LA 70898

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
In the Matter of)
GULF STATES UTILITIES COMPANY)

Docket No. 50-458

(River Bend Station - Unit 1)

AFFIDAVIT

W. H. Odell, being duly sworn, states that he is a Manager - Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.



W. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 7th day of January, 1991. My Commission expires with Life.



Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT

PROPOSED
GULF STATES UTILITIES COMPANY
RIVER BEND STATION
DOCKET 50-458/LICENSE NO. NPF-47

CONTINUOUS MONITORING OF REACTOR COOLANT CONDUCTIVITY
(88-14)

LICENSING DOCUMENT INVOLVED:

TECHNICAL SPECIFICATIONS

ITEM:

Section 4.4.4.c

REASON FOR REQUEST:

In accordance with 10CFR50.90, a change is being requested to remove the 31 day limit as specified in Technical Specification Surveillance Requirement 4.4.4.c. The specification presently provides an alternative action for the loss of the continuous monitoring of conductivity for a period up to 31 days. GSU has reviewed this function and determined that the 31 day limit may be removed without effecting the safe operation of the plant.

DISCUSSION:

Currently, Technical Specification Surveillance Requirement 4.4.4.c requires continuously monitoring the conductivity of the reactor coolant, or when the continuous recording conductivity monitor is inoperable for up to 31 days, obtaining an in-line conductivity measurement at least once every 4 hours during hot operations and at least once every 24 hours at all other times, with no further guidance or related ACTION if this 31 day time period is exceeded. To comply with the Technical Specifications, the limiting condition for operation (LCO) is entered in accordance with Technical Specification 4.0.3 where compliance with Statement 3.4.4.c.1 will be accomplished by performing the required engineering evaluation of the effects of the out-of-limit condition on the structural integrity of the reactor coolant system. The once per 24 hour in-line conductivity measurements, as well as the analyses of the required once per 72 hour samples taken in accordance with Surveillance 4.4.4.b, will confirm that the conductivity is below the Technical Specification limits of Table 3.4.4-1 or provide sufficient time for the plant to respond to changes in reactor water chemistry; thereby, maintaining the structural integrity of the reactor coolant system.

The water chemistry limits of the Reactor Coolant System (RCS) are established to provide an environment favorable to reactor materials in contact with the coolant, primarily carbon steel, austenitic stainless steel and Zircaloy cladding. Conductivity measurements are required on a continuous basis since changes in this parameter are indicative of abnormal conditions. When the conductivity is within limits, the other parameters of importance, pH, chlorides and other impurities, will also be in their acceptable limits as discussed in the USAR Section 5.2.3.2.2. The 31 day limit was exceeded during the first, second and third refueling outages because the RCS and the Reactor Water Cleanup System (WCS) were not in service for more than 31 days due to outage maintenance work as discussed in informational reports dated January 28, 1988 (RBG-27357), June 26, 1989 (RBG-31151) and December 20, 1990 (RBG-34193). Nothing was functionally wrong with the conductivity instrument at these times. The only reason for inoperability was no flow through the instrument sample line, as this flow is dependent upon the reactor being pressurized. Exceeding the 31 day limit will probably occur every refueling outage because of scheduled maintenance activities on these systems.

During cold shutdown conditions, when monitor inoperability has been experienced, placing the plant in a condition less susceptible to damage resulting from a chemical intrusion is not applicable as the plant is already in such a condition. Frequent samples are obtained to monitor steady state conditions and the once per 24 hour sampling requirement of RCS water, along with the operable status of conductivity monitors in the reactor feedwater and rod drive water systems, are adequate to detect and to take timely action to correct a chemical intrusion.

As discussed above, this condition has only been experienced during Operational Conditions 4 and 5 and is not expected during normal power operations. However, should the continuous conductivity monitor become inoperable during normal power operations, repairs would be attempted expeditiously to return this monitor to operable status. The removal of this 31 day requirement will prevent the performance of unnecessary engineering evaluations when the reactor coolant system conductivity has been verified to be within limits using grab samples. Also, the deletion of this requirement from Technical Specification 4.4.4.c will cause the RBS Technical Specifications to be similar to other BWR 6 plants and plants of similar vintage. This revision to the Technical Specifications is in agreement with Regulatory Guide 1.56 and River Bend USAR Section 5.5.3.2 and does not lessen GSU's commitment to these documents.

SIGNIFICANT HAZARDS CONSIDERATION:

In accordance with the requirements of 10CFR50.92, the following discussions are provided in support of the determination that no significant hazards are created or increased by the change proposed in this submittal.

1. The proposed change would not increase the probability or consequences of a previously evaluated accident because:

The existing required surveillances, frequencies, and other sampling activities, provide adequate assurance that chlorides and other impurities are not exceeding the limits as analyzed in the USAR. The change being proposed is considered administrative in nature and only removes the 31 day limit requirement which will not affect continued, safe operation of the plant during shutdown conditions. Therefore, this proposed change clarifies the intent of the subject Technical Specification while still ensuring the integrity of the reactor coolant system is maintained and does not lower the level of performance.

2. The proposed change would not create the possibility of a new or different kind of accident from any previously evaluated because:

The proposed change would not change any operation, action or plant decision needed to maintain the proper conductivity limits for chlorides and other impurities. Existing programs of sampling at the currently specified frequencies will help ensure system reliability within the existing analyzed conditions.

3. The proposal as submitted would not involve a significant reduction in the margin of safety because:

The surveillance requirements provide adequate assurance that concentrations in excess of the limits will be detected in sufficient time to take corrective action to maintain the RCS integrity. The proposed change would not decrease the margin of safety as defined in the applicable Technical Specification bases.

The proposed amendment, as discussed above, will not change system design, function or operation as described in the USAR and therefore, will not increase the probability or the consequence of a previously evaluated event or will not create a new or different event. Since the ability to perform, as described in the USAR is maintained by this change, the proposed change does not result in a significant reduction in the margin of safety. GSU proposes that no significant hazards are involved.

As indicated above, River Bend Station is currently in compliance with the applicable Technical Specification requirements. As a result of exceeding this limit during the first, second and third refueling outages, this proposed change is requested to be approved prior to the next scheduled outage, presently scheduled to begin September, 1991. There will be the potential for this 31 day limit to be exceeded during the mid-cycle 4 outage should the schedule be extended.

NOTIFICATION OF STATE PERSONNEL:

A copy of this amendment request has been provided to the State of Louisiana, Department of Environmental Quality - Radiation Protection Division.

ENVIRONMENTAL IMPACT APPRAISAL:

GSU has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, GSU concludes that the proposed change meets the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.