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June 3, 1994

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
Fire Hazards Analysis (FHA) Update

- Reference:
1. AECM-85/0164, Proposed FSAR Changes Associated with Recent MP&L Fire Protection Review, dated May 18, 1985.
 2. GNRO-93/0057, Fire Hazards Analysis (FHA), Revision 7, dated May 7, 1993.
 3. GNRI-91/0177, Issuance of Amendment No. 82 to Facility Operating License No. NPF-29 - Grand Gulf Nuclear Station, Unit 1, Regarding the Fire Protection Program (TAC No. 77505), dated August 23, 1991.

GNRO-94/00082

Gentlemen:

In AECM-85/0164 (Reference 1) Grand Gulf Nuclear Station (GGNS) committed to submit updates to the Fire Hazards Analysis (FHA) on a schedule consistent with 10 CFR 50.71(e). The GGNS FHA has not been revised since the update provided via GNRO-93/0057 (Reference 2) and this letter constitutes our update of the GGNS FHA within 6 months following Refueling Outage 6.

The GGNS FHA is a plant controlled document and is discussed in Appendix 9A of the Updated Final Safety Analysis Report (UFSAR). The UFSAR states that the GGNS FHA is controlled by the provisions of GGNS Operating License Condition 2.C.(41). The control of GGNS Operating License Condition 2.C.(41) is in addition to the requirements of 10 CFR 50.59 which is required for the GGNS FHA as discussed in the Safety Evaluation Report dated August 23, 1991 (Reference 3). Operating License Condition 2.C.(41) only allows changes to the approved Fire Protection Program without prior approval of the Commission if the changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

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The periodic submittal of updates to the GGNS FHA does not result in a significant increase in the level of safety since Operating License Condition 2.C.(41) and 10 CFR 50.59 provide the assurance of the appropriateness of any changes made to the GGNS FHA. In addition, a summary of revisions to the FHA made in accordance with 10CFR50.59 is provided in the summary report required by 10CFR50.59 and any UFSAR changes corresponding to FHA revisions are provided as required by 10CFR50.71(e). As a result, GGNS is modifying by this letter the commitment made via AECM-85/0164 to submit updates of the GGNS FHA on a schedule consistent with 10 CFR 50.71(e). In the future updates will only be submitted when required by either Operating License Condition 2.C.(41) or 10 CFR 50.59. The GGNS FHA will continue to be available at the plant site for your review as needed.

GGNS has evaluated this change in the commitment of AECM-85/0164 in accordance with 10CFR50.59.

Yours truly,



C. R. Hutchinson
Vice President, Operations GGNS

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cc:

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