



# Entergy Operations

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**W. T. Cottle**  
Vice President  
Operations  
Grand Gulf Nuclear Station

March 15, 1991

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  
Removal of 3.25 Limit on Surveillance Intervals  
Proposed Amendment to the Operating License (PCOL-91/02)

GNRO-91/00039

Gentlemen:

Entergy Operations, Inc. is submitting by this letter a proposed amendment to the Grand Gulf Nuclear Station Operating License. The proposed amendment requests the removal of the 3.25 limit on surveillance interval extensions. On August 21, 1989, the NRC issued Generic Letter (GL) 89-14, "Line Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals." This Generic Letter encourages licensees to propose changes to Technical Specification 4.0.2 that would remove the stipulation that any 3 consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.

The proposed changes to the Technical Specifications are consistent with and conform to the guidance in GL 89-14. Therefore, Entergy Operations is requesting that NRC review of this submittal be conducted in accordance with GL 89-14.

In accordance with the provisions of 10CFR50.4, the signed original of the requested amendment is enclosed. Attachment 2 provides the discussion and justification to support the requested amendment.

This amendment has been reviewed and accepted by the Plant Safety Review Committee and the Safety Review Committee.

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March 15, 1991  
GNRO-91/00039  
Page 2 of 3

Based on the guidelines given in 10CFR50.92, Entergy Operations has concluded that this proposed amendment involves no significant hazards considerations.

Yours truly,

*WTC*

WTC/SBM/mtc

attachments: 1. Affirmation per 10CFR50.30  
2. GGNS PCOL-91/02

cc: Mr. D. C. Hintz (w/a)  
Mr. J. Mathis (w/a)  
Mr. R. B. McGehee (w/a)  
Mr. N. S. Reynolds (w/a)  
Mr. H. L. Thomas (w/o)

Mr. Stewart D. Ebnetter (w/a)  
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Mr. L. L. Kintner, Project Manager (w/a)  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

Dr. Alton B. Cobb (w/a)  
State Health Officer  
State Board of Health  
P.O. Box 1700  
Jackson, Mississippi 39205

BEFORE THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION

LICENSE NO. NPF-29

DOCKET NO. 50-416

IN THE MATTER OF  
MISSISSIPPI POWER & LIGHT COMPANY  
and  
SYSTEM ENERGY RESOURCES, INC.  
and  
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION  
and  
ENTERGY OPERATIONS, INC.

AFFIRMATION

I, W. T. Cottle, being duly sworn, state that I am Vice President, Operations GGNS of Entergy Operations, Inc.; that on behalf of Entergy Operations, Inc., System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by Entergy Operations, Inc. to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Vice President, Operations GGNS of Entergy Operations, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

W T Cottle

W. T. Cottle

STATE OF MISSISSIPPI  
COUNTY OF CLAIBORNE

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 15 day of March, 1991.

(SEAL)

Patricia Sheehy  
Notary Public

My commission expires:  
My Commission Expires July 1, 1993

PROPOSED CHANGE TO THE OPERATING LICENSE

- REVISIONS TO TS 4.0.2 & BASES 4.0.2 -

(GGNS PCOL-91/02)

A. SUBJECT

1. NL-91/01                      Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals (Generic Letter 89-14)
2. Affected Technical Specifications:
  - a. Surveillance Requirement 4.0.2 - Page 3/4 0-2
  - b. Bases 4.0.2 - Page B 3/4 0-4

B. DISCUSSION

1. Technical Specification (TS) 4.0.2 currently permits surveillance intervals to be extended by 25% of the specified interval. This allowance aids in scheduling surveillance activities and permits surveillances to be postponed when plant conditions are not suitable for the performance of the surveillance. Additionally, present TS 4.0.2 limits surveillance interval extensions to ensure that the combined time of any three consecutive intervals is not more than 3.25 times the specified interval.
2. On August 21, 1989, the NRC issued Generic Letter (GL) 89-14 which encourages licensees to propose changes to the TS to eliminate the 3.25 limit on surveillance interval extensions and provides guidance for the preparation of a license amendment request to incorporate this recommendation into the TS. The NRC Staff concludes that removal of the 3.25 limit results in a greater benefit to safety than limiting the use of the 25% allowance to extend surveillance intervals.
3. The following revisions to the GGNS TS are requested:
  - a. The proposed change deletes Item b. from TS 4.0.2 which limits the combined time interval for any 3 consecutive surveillance intervals to 3.25 times the specified surveillance interval.
  - b. From Bases 4.C.2, all references to the 3.25 limit on surveillance interval extensions are removed. Statements are added that explain the 25% limit on surveillance interval extensions allows flexibility for outage surveillance scheduling but is not intended as a convenience to repeatedly extend non-outage surveillance intervals.
4. The affected TS and associated Bases pages are attached and marked-up to reflect the proposed changes described above. The requested revisions are consistent with the guidance in GL 89-14.

C. JUSTIFICATION

1. This proposed amendment provides additional safety benefits during outages and plant operation and greater flexibility in surveillance scheduling.
2. Surveillances with 18-month time intervals are generally intended to be performed during refueling outages. Therefore, the actual surveillance interval is dependent on the length of the fuel cycle but cannot exceed 18 months plus the 25% allowance, provided the 3.25 limit has not been exceeded. Industry experience has shown that an 18-month surveillance interval with the provision to extend it by 25% is usually sufficient to accommodate normal variations in a fuel cycle length. However, the NRC Staff has routinely granted requests by other facilities for one-time exceptions to the 3.25 limit on extending outage surveillance intervals because the risk to safety is low in comparison to the safety risk of a forced shutdown to perform these surveillances.
3. A significant safety benefit is also gained with the use of the 25% extension for routine surveillances that are performed during plant operation. When plant conditions are not conducive to the performance of a surveillance, the postponement of that surveillance until plant conditions are more suitable enhances safety. Examples of these unsuitable conditions for the conduct of surveillances include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. The safety benefit of allowing the use of the 25% extension of a surveillance interval outweighs any benefit gained by limiting 3 consecutive surveillance intervals by the 3.25 limit.

## D. NO SIGNIFICANT HAZARDS CONSIDERATIONS

1. The proposed amendment revises TS 4.0.2 by deleting the 3.25 limit on extending surveillance intervals in accordance with the guidance in NRC GL 89-14.
2. The Commission has provided standards for determining whether a no significant hazards consideration exists as stated in 10CFR50.92(c). A proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:
  - (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
  - (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
  - (3) involve a significant reduction in a margin of safety.
3. Entergy Operations has evaluated the no significant hazards considerations in its request for a license amendment. In accordance with 10CFR50.91(a), Entergy Operations is providing the analysis of the proposed amendment against the three standards in 10CFR50.92:
  - a. No significant increase in the probability or consequences of an accident previously evaluated results from this change.
    - (1) The removal of the 3.25 limit on extending surveillance intervals will not impact plant design or the operation of plant systems. Surveillance interval extensions will continue to be limited by 25% of the specified surveillance interval. Hence, the same degree of equipment reliability is maintained and the probability of a previously analyzed accident is not significantly increased.
    - (2) Since the proposed change does not require any modification of equipment designed to mitigate the events of an accident, the consequences of an accident already evaluated will not change.
    - (3) Therefore, the probability or consequences of previously analyzed accidents are not increased.
  - b. The change would not create the possibility of a new or different kind of accident from any previously analyzed.
    - (1) The proposed change will not require the addition, deletion or modification of any plant hardware.
    - (2) The method by which any safety-related system performs its function will not be changed.
    - (3) No tests or experiments will be changed or added.

- (4) The proposed change will not affect the methods of verifying component or system operability.
  - (5) Therefore, operating the plant with the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.
- c. This change would not involve a significant reduction in the margin of safety.
- (1) Surveillance testing performed in accordance with Specification 4.0.2 and the maximum 25% interval extension will continue to ensure adequate system reliability and operability.
  - (2) Safety will actually be enhanced by reducing the potential to interrupt normal plant operation due to outage surveillance scheduling or by delaying surveillance activities during operation until a more favorable plant condition exists. An overall positive effect on safety is achieved.
  - (3) Therefore, this change will not involve a reduction in the margin of safety.
4. Based on the above evaluation, operation in accordance with the proposed amendment involves no significant hazards considerations.