



**Entergy
Operations**

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March 15, 1991

U.S. Nuclear Regulatory Commission
Mail Station P1-13
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Implementation of GL 91-01: Removal of the Schedule for the
Withdrawal of Reactor Vessel Material Specimens
(PCOL-91/05)

Reference: NRC Letter dated January 4, 1991, Removal of the Schedule
for the Withdrawal of Reactor Vessel Material Specimens from
Technical Specifications (Generic Letter 91-01)

GNRO-91/00047

Gentlemen:

Entergy Operations, Inc. is submitting by this letter a proposed amendment to the Grand Gulf Nuclear Station (GGNS) Operating License as requested in the reference letter. The proposed amendment would delete the Surveillance Specimen Withdrawal Schedule, Table 4.4.6.1.3-1, from the Technical Specifications. Also, the portion of Surveillance Requirement 4.4.6.1.4 relating to the reactor vessel material surveillance withdrawal schedule would be removed from the Technical Specifications and relocated to the Updated Final Safety Analysis Report. The proposed changes are considered to be administrative in nature since the program for surveillance of reactor vessel material will continue to be governed by 10CFR Part 50, Appendix H.

In accordance with the provisions of 10CFR50.4, the signed original of the requested amendment is enclosed. Attachment 2 provides the technical justification and discussion 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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Based on the guidelines presented in 10CFR50.92, Entergy Operations has concluded that this proposed amendment involves no significant hazards considerations.

The proposed changes to the TS are consistent with and conform to the guidance in GL 91-01. Therefore, Entergy Operations is requesting expeditious review by the GGNS NRC Project Manager on this submittal in accordance with GL 91-01.

Yours truly,

W. F. Cobb

WTC/JS/mtc

attachments: 1. Affirmation, per 10CFR50.30
2. GGNS PCOL-91/05

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. F. W. Titus (w/a)

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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.

(FEAL)

Patricia McLaughan
Notary Public

My commission expires:

My Commission Expires July 1, 1993

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A. SUBJECT:

1. NL-91/04 Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens
2. Affected Technical Specifications:
 - a. Reactor Coolant System - Surveillance Requirement 4.4.6.1.4, Page 3/4 4-20
 - b. Reactor Vessel Material Surveillance Program - Withdrawal Schedule, Table 4.4.6.1.3-1, Page 3/4 4-22

B. DISCUSSION:

1. On January 4, 1991 the NRC issued Generic Letter (GL) 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications." The purpose of GL 91-01 was to provide guidance to licensees for the preparation of a request for a license amendment to remove from the Technical Specifications (TS) the schedule for the withdrawal of reactor vessel material surveillance specimens.

This TS change is requested because 10CFR Part 50, Appendix H governs the withdrawal schedule for material specimens and requires NRC approval prior to implementation. Hence, the schedule in the TS duplicates controls already established by Appendix H.

Removal of this information from the TS will eliminate the unnecessary use of GGNS and NRC resources to process future license amendments.

2. Consistent with the NRC guidance provided in GL 91-01, the following TS changes are proposed:
 - a. Revise TS 4.4.6.1.4 to delete: "... in accordance with the schedule in Table 4.4.6.1.3-1".
 - b. Delete Table 4.4.6.1.3-1 in its entirety.
3. Attached to this proposed TS change are the affected TS pages marked up to reflect the above described changes.

C. JUSTIFICATION:

1. Removal from the TS the schedule for the withdrawal of reactor vessel material specimens will allow future adjustments to the withdrawal schedule to be made without submittal of a license amendment request.
2. The schedule for the withdrawal of reactor vessel material specimens will be incorporated into the next revision of the GGNS Updated Final Safety Analysis Report (UFSAR) as delineated in GL 91-01.

3. The TS surveillance requirement is maintained to require removal, examination, and determination of changes in material properties pursuant to 10CFR Part 50, Appendix H; therefore, the proposed change will not result in any loss of regulatory control.
4. The proposed license amendment to remove the surveillance specimen withdrawal schedule is considered to be administrative in nature since the program for surveillance of reactor vessel material will still be governed by 10CFR Part 50, Appendix H.

D. NO SIGNIFICANT HAZARDS CONSIDERATIONS

1. Entergy Operations, Inc. is proposing that TS Table 4.4.6.1.3-1 be deleted and Surveillance Requirement 4.4.6.1.4 be revised. The proposed changes are considered administrative in nature since the program for surveillance of reactor vessel material will continue to be governed by 10CFR Part 50, Appendix H.
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 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. GGNS has evaluated the no significant hazards considerations in its request for a license amendment. In accordance with 10CFR50.91(a), GGNS is providing the following 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.

The proposed change does not significantly increase the probability or consequences of an accident previously evaluated because the reactor vessel material surveillance program is not affected by this proposed change. Implementation of the proposed change will delete a license requirement that is redundant to the Code of Federal Regulations. Thus, this proposed TS is considered to be administrative in nature.

This change would not result in a significant increase in the probability or consequences of an accident previously evaluated.

- b. This change would not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated because implementation of this change will not alter plant configuration or modes of operation. Compliance with existing regulations will ensure continued confidence in reactor vessel material properties.

Therefore, the requested revisions will not create the possibility of a new or different accident from any previously analyzed.

- c. This change would not involve a significant reduction in the margin of safety.

The proposed change will not involve a significant reduction in the margin of safety because the evaluation of reactor vessel material embrittlement is not altered by this change. Table 4.4.6.3-1 will be relocated to the UFSAR where the requirements of 10CFR Part 50, Appendix H will still apply.

Therefore, the proposed change will not involve a significant reduction in the margin of safety.

4. Based on the above evaluation, Entergy Operations has concluded that operation in accordance with the proposed amendment involves no significant hazards considerations.