

PROPOSED CHANGE TO THE
OPERATING LICENSE
REVISIONS TO TECHNICAL SPECIFICATION
Table 3.3.7.5-1
(GGNS PCOL-91/09)

A. SUBJECT

1. NL-91/08 Technical Specification Compliance with Generic Letter 83-36.
2. Affected Technical Specifications:
 - a. Accident Monitoring Instrumentation, Table 3.3.7.5-1 (Items 8 and 9) - pages 3/4 3-74 and 3-75
 - b. Accident Monitoring Instrumentation, Table 3.3.7.5-1 (Action 81) - page 3/4 3-75

B. DISCUSSION

1. GGNS Technical Specification (TS) 3.3.7.5 (Table 3.3.7.5-1, Items 8 and 9), "Accident Monitoring Instrumentation," specifies OPERABILITY requirements for the drywell and containment hydrogen concentration analyzers and monitors (H_2 Monitors) including ACTIONS to be taken in the event one or more channels are inoperable. The proposed change for the analyzers and monitors would increase the amount of allowed outage time permitted before a plant shutdown is required.
2. GGNS TS 3.3.7.5 (Table 3.3.7.5-1, Action 81), "Accident Monitoring Instrumentation," specifies OPERABILITY requirements for several accident range radiation monitors (rad monitors) including ACTIONS to be taken in the event one or more rad monitors are inoperable. The proposed change would increase the time limit at which an inoperable rad monitor would become reportable per TS 6.9.2.
3. Presently, TS for the above instrumentation is not consistent with the guidance provided in NRC Generic Letter (GL) 83-36. Therefore, Entergy Operations, Inc. proposes to revise the TS ACTIONS specified for the above accident monitoring instrumentation in Table 3.3.7.5-1 such that the ACTIONS are consistent with the guidance provided in NRC GL 83-36.

C. JUSTIFICATION

1. The design basis of all engineered safety features is to mitigate accidents and does not take into consideration operator action or assistance for the first ten minutes of the accident. This assumption makes it mandatory that all protective actions necessary in the first ten minutes be "automatic." Therefore, information for operators to base actions upon from post-accident instrumentation is not required for at least ten minutes following an accident.

2. In accordance with TS 3.3.7.5 and UFSAR commitments contained in Section 7.5.1.2.8, the containment/drywell hydrogen monitoring systems are required to provide continuous indication and alarm capabilities in the control room of hydrogen concentrations in the containment and drywell atmosphere following a postulated LOCA.

The system provides operators with the capability to assess the extent of hydrogen mixing or generation in the containment and drywell. The system provides no automatic safety system actuations, it strictly performs a monitoring function.

In the event the Hydrogen Monitoring System is inoperable during the course of an accident, approved plant procedures specify other means by which the hydrogen concentration of the containment and drywell atmosphere can be obtained by sampling and analysis.

3. The radiation monitors provide indications of radiation levels inside the drywell and containment, along with various ventilation effluents during accident conditions.
4. The operability of these and other accident monitoring instrumentation ensures that sufficient information is available to operators on selected plant parameters to monitor and assess important variables following an accident.
5. The existing TS associated with accident monitoring is consistent with the recommendations of NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations". In 1983 a Generic Letter was issued on the subject of NUREG-0737 related TS (GL 83-36). GL 83-36 identified several TS requirements which could be relaxed. The relaxation of these TS requirements would provide GGNS sufficient time to perform required maintenance and surveillance testing without increasing the consequences of an accident.
6. The net effect of the requested changes is to extend the allowed out of service time of the H₂ monitors and in addition extend the time for which a Special Report is required to be written for inoperable radiation monitors. As stated above, the instrumentation serves no automatic accident mitigation function, but provides operator information following a postulated accident. The additional time is justified based on the compliance with the requirements of the ACTIONS and the heightened awareness of the condition of the system when the LCO is entered into the Control Room LCO Log. The imposition of the Special Report requirement does not aid in restoring the instrument to OPERABILITY but only imposes an additional administrative task with no commensurate improvement in safety. Generic Letter 83-36 supports this conclusion.

D. NO SIGNIFICANT HAZARDS CONSIDERATION

1. Entergy Operations, Inc. is proposing that TS Table 3.3.7.5-1 be revised to change the allowed outage times for the containment and drywell hydrogen analyzers and monitors. The proposed changes also would change the time limit at which an inoperable radiation monitor becomes reportable per TS 6.9.2. The proposed changes are consistent with the guidance of GL 83-36.
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 malfunction or misoperation of the instrumentation affected by the proposed change is not considered to be an initiating event in any accidents evaluated in the UFSAR. The instrumentation serves only as a source of information for the operator following a postulated accident. The analyses do not rely upon operator actions in lieu of automatic safety system actuation during the first ten minutes of any accident and no credit is taken in the analyses for post accident instrumentation. Although operator actions are relied upon to mitigate degradation of containment due to hydrogen concentration, approved Emergency Operating Procedures are currently in use which give specific guidance in the event the H₂ Monitors are not available. Compliance with the proposed ACTIONS of the TS provides adequate compensatory measures (e.g. Post Accident Sampling System (PASS) samples, grab samples) given the role of the systems in the overall safety of the plant.

The proposed change, therefore, does not significantly increase 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 affected instruments provide monitoring capability only. No new modes of plant operations are introduced by the proposed changes. The existing instrumentation will remain available to provide operators information.

Therefore, the requested change 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 Emergency Procedure, which addresses hydrogen control, gives guidance in the event the H₂ monitors are not available. The procedure references the PASS as a means of obtaining an adequate atmospheric sample of the drywell and containment. Therefore, the proposed change would not affect the ability to obtain an indication of hydrogen concentration.

The proposed changes do not affect the methodology used in the offsite dose analysis nor the acceptance criteria associated with any accident analysis.

Therefore, this change will not involve a 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.

TABLE 3.3.7.5-1
 ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	APPLICABLE OPERATIONAL CONDITIONS	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION
1. Reactor Vessel Pressure	1, 2, 3	2	1	80
2. Reactor Vessel Water Level	1, 2, 3, 4, 5	2	1	82
3. Suppression Pool Water Level	1, 2, 3	2	1	80
4. Suppression Pool Water Temperature	1, 2, 3	6, 1/sector	6, 1/sector	80
5. Drywell/Containment Differential Pressure	1, 2, 3	2	1	80
6. Drywell Pressure	1, 2, 3	2	1	80
7. Drywell and Control Rod Drive Cavity Temperature	1, 2, 3	2 (each)	1 (each)	80
8. Containment Hydrogen Concentration Analyzer and Monitor	1, 2, 3	2	1	83 80
9. Drywell Hydrogen Concentration Analyzer and Monitor	1, 2, 3	2	1	83 80
10. Containment Pressure (wide and narrow range)	1, 2, 3	2 (each)	1 (each)	80
11. Containment Air Temperature	1, 2, 3	2	1	80
12. Safety/Relief Valve Tail Pipe Pressure Switch Position Indicators	1, 2, 3	1/valve	1/valve	80
13. Containment/Drywell Area Radiation Monitors	1, 2, 3, 4, 5	2 [#]	2 [#]	81
14. Containment Ventilation Exhaust Radiation Monitor	1, 2, 3, 4, 5	1	1	81
15. Off-gas and Radwaste Bldg. Ventilation Exhaust Radiation Monitor	1, 2, 3, 4, 5	1	1	81
16. Fuel Handling Area Ventilation Exhaust Radiation Monitor	1, 2, 3, 4, 5	1	1	81
17. Turbine Bldg. Ventilation Exhaust Radiation Monitor	1, 2, 3	1	1	81
18. Standby Gas Treatment System A & B Exhaust Radiation Monitors	*	1/each	1/each	81

#Each for containment and drywell.

*When its associated train of the standby gas treatment system is required operable (Ref 3.6.6.1)

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TABLE 3.3.7.5-1 (Continued)
ACCIDENT MONITORING INSTRUMENTATION

ACTION STATEMENTS

ACTION 80 -

- a. With the number of OPERABLE accident monitoring instrumentation channels less than the Required Number of Channels shown in Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and be in COLD SHUTDOWN within the next 24 hours.
- b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours and be in COLD SHUTDOWN within the next 24 hours.

ACTION 81 -

Insert A

With the number of OPERABLE accident monitoring instrumentation channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or:
 a. Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and
 b. Prepare and submit a Special Report to the Commission pursuant to Specification 5.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 82 - For OPERATIONAL CONDITIONS 1, 2, 3

- a. With the number of OPERABLE accident monitoring instrumentation channels less than the Required Number of Channels shown in Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and be in COLD SHUTDOWN within the next 24 hours.
- b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours and be in COLD SHUTDOWN within the next 24 hours.

For OPERATIONAL CONDITIONS 4, 5

With the number of OPERABLE accident monitoring instrumentation channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or initiate the preplanned alternate method of monitoring the appropriate parameter(s).

Insert B

Insert A

With the number of OPERABLE channels less than required by the minimum channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours, and:

- a. either restore the inoperable channel(s) to OPERABLE status within 7 days of the event, or
- b. prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

Insert B

ACTION 83

- a. With the number of OPERABLE channels one less than the required number of channels shown in Table 3.3.7.5-1, restore the inoperable channel to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and be in COLD SHUTDOWN within the next 24 hours.
- b. With the number of OPERABLE channels less than the minimum channels OPERABLE requirements of Table 3.3.7.5-1, restore at least one channel to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and be in COLD SHUTDOWN within the next 24 hours.