



September 19, 1996

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
Purge Valve Testing
Revision to Proposed Amendment to the Operating License
(PCOL-96/051)

GNRO-96/00108

Gentlemen:

Entergy Operations, Inc. is submitting by this letter a revision to a proposed amendment to the Grand Gulf Nuclear Station (GGNS) Operating License. By letter dated May 5, 1996, we requested a change that would put containment purge valves with resilient seals on a performance based leakage testing frequency. We requested that these valves be tested in accordance with our Appendix J testing program. The proposed change would affect Operating License Surveillance Requirement (SR) 3.6.1.3.5.

On September 11, 1996, in a conference call, the staff stated that they believed that the data available supported a maximum interval of 36 months. In addition, we were informed that all the purge valves must be tested within 92 days if any purge valve fails to meet it's acceptance criteria and that a staggered testing interval would be required.

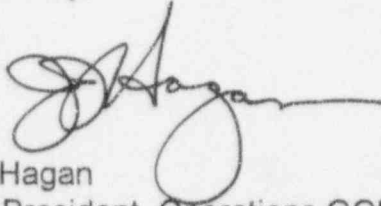
A staggered test interval is currently required by our Appendix J leak rate testing program. A portion of each of the components on extended testing intervals are tested each outage to assist in identifying common mode failures. This establishes what amounts to a sampling program for these valves. This staggered testing helps to ensure that problems associated with valves of similar design, age or usage are identified on a reasonable frequency. In addition, a review is performed on each failure to determine if the failure is generic or isolated. If it is determined that the failure is generic, all other components that

AD17%

are subject to the same failure mechanism are adjusted to an appropriate interval.

During our discussions, we agreed to reword a portion of the proposed change to implement the prescribed changes. Attachment 1 is the oath and affirmation required by 10 CFR 50.30. Attachment 2 provides a revision to "Insert 3.6-15A" and "Insert B 3.6-24A" from our original submittal, as well as a revised mark-up of the Bases. The no significant hazards considerations included in the original proposal also applies to this revision and is therefore not included here.

Yours truly,

A handwritten signature in black ink, appearing to read "J. J. Hagan", with a long horizontal stroke extending to the right.

J. J. Hagan
Vice President, Operations GGNS

JJH/WBB/ams
attachments:

1. Affirmation per 10 CFR 50.30
2. Revised Marked-up Pages To The GGNS Operating License
(See Next Page)

cc:

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

LICENSE NO. NPF-29

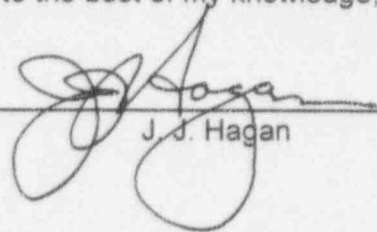
DOCKET NO. 50-416

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, J. J. Hagan, 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.

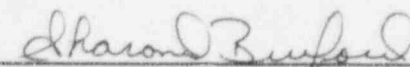


J. J. Hagan

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 19th day of September, 1996.

(SEAL)



Notary Public

My commission expires:

MISSISSIPPI STATEWIDE NOTARY PUBLIC
COMMISSION EXPIRES JAN. 27, 2000
UNIDED THIS STECALL NOTARY SERVICE

Insert 3.6-15A

36 months with at least 2 pairs of valves tested every 18 months

AND

-----note-----
SR 3.0.2 is not applicable

In Accordance with 10 CFR 50, Appendix J, as modified by approved exemptions

AND

-----note-----
Not applicable to valves
tested within 92 days prior
to any purge valve failing to
meet it's acceptance criteria

Once within 92 days, test all remaining purge valves, if any purge valve fails to meet it's acceptance criteria

Insert B 3.6-24A

36 months, with consideration given to operational experience and safety significance. Additionally, this SR must be performed for all purge valves within 92 days following any purge valve failing to meet it's acceptance criteria. This ensures that any common mode seal degradation is identified.

The Frequency for this SR is modified by two notes. The first note indicates that SR 3.0.2 is only applicable to the "36 month" statement in the frequency. The second note indicates that all valves do not have to be retested due to the failure of another valve, provided they have been tested within 92 days prior to any valve failing to meet it's acceptance criteria.