Docket No. 50-416 AUG 0 8 1988 DISTRIBUTION: See attached list

LICENSEE: System Energy Resources, Inc.

FACILITY: Grand Gulf Nuclear Station, Unit 1

SUBJECT: SUMMARY OF JUNE 14 AND 15, 1988 MEETING REGARDING POTENTIAL CHANGES TO TECHNICAL SPECIFICATIONS

On June 14 and 15, 1988, the NRC staff met with representatives from System Energy Resources Inc., (SERI) to discuss potential changes to Technical Specifications (TS) to be submitted in 1988. Enclosure 1 is a list of participants. Enclosure 2 contains potential TS changes.

The licensee informed the staff that SERI Nuclear Licensing personnel are reviewing the effective Technical Specification Position Statements to determine whether TSPS can be eliminated. Some of the TSPS which identify specific instrumentation or equipment for surveillance tests may be included in the test procedures. Those TSPS which are more conservative than TS or more specific than TS or interpret TS may be submitted as proposed TS changes.

The licensee stated that the target outage time for the third refueling outage is 45 days, beginning February 15, 1989. Previous target outage times were 60 days. The proposed TS changes will reduce outage time to make the target time viable.

Following are the TS changes being considered for 1988.

1. Implementation of Generic Letter 87-09, Revision of Section 3/4.0 Applicability

   The licensee will proposed changes to Sections 3.0.4 and 4.0.3 in accordance with Generic Letter 87-09 (GL 87-09). The revised Section 3.0.4 will allow changes in operational modes when limiting conditions for operation are not met, provided applicable action statements permit continued operation for an unlimited time period. The staff requested the licensee to identify and evaluate each TS which will be affected. Affected TS include those which will not have word changes but have action statements that permit operation for an unlimited time. Also, the staff requested the licensee to propose exceptions to the revised TS 3.0.4 for those TS which concern equipment whose function is needed during mode changes (e.g., control rod drive accumulators are needed for startup when reactor pressure is low). For action statements which allow the use of alternate equipment that may not provide the same level of safety as the equipment specified in the limiting condition for operation (LCO), compensatory administrative controls should be described in the safety analysis. For example, during modes 4 and 5, action statements allow the

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use of unspecified equipment for alternate shutdown cooling and for coolant recirculation if the RHR or ECC systems are inoperable. Amendment 38 to the Operating License described equipment to be used during the second refueling shutdown as alternates and administrative procedures to minimize the time in this action statement.

The revised Section 4.0.3 will allow up to 24 hours to permit completion of a missed surveillance test. At the licensee's request, the staff agreed to consider changes to the revised Bases section in GL 87-09 to clarify that the time limits are applicable from the time it is identified that a surveillance test has been missed or that an LCO is not met. The staff also agreed to consider the deletion of the last sentence in the fourth paragraph of the Bases for TS 3.0.3 regarding the addition of allowable outage time limits, since it appeared to be confusing to the licensee and is not necessary.

The licensee said the first paragraph of the Bases for TS 4.0.3 was different than present industry practice regarding reporting of missed surveillance tests. Present Bases do not address missed surveillances as TS violations which are subject to enforcement actions or reporting requirements. The licensee interprets present TS 4.0.3 to mean that failure to perform a surveillance test within the specified time interval would require the system to be declared inoperable and entry into the action statement to be made. However, missed surveillances are not reported under 10 CFR 50.73 as a violation of TS. The GL 87-09 Bases state that failure to perform a surveillance test is a violation of TS and, therefore, reportable under 50.73. The staff said the interpretation in GL 87-09 is the correct interpretation for the present TS as well as the revised TS.

2. Operational Conditions For Fuel Handling Area Radiation Monitors

This TS change would change applicable conditions for radiation monitors in the fuel handling area ventilation exhaust and the pool sweep exhaust so the monitors would not be required to be operable in Operational Conditions 4 or 5 except when handling fuel, performing core alterations or operations with a potential for draining the core. (Enclosure 2, pages 1, 2, and 3). The logic for the changes is that they would make the applicability of the radiation monitors consistent with the applicability of the actuated device, the standby gas treatment system. The staff agreed that this appeared to be a reasonable change.

3. Local Leak Rate Testing Of Valves In Small Lines

This change would delete the requirement for local leak rate testing of valves in small diameter test, drain and vent lines. The licensee indicated most lines would be ½ inch diameter although some may be as large as 1 inch diameter.

4. Surveillance Intervals For Reactor Protection System Instrumentation

This change would be in accord with the approved GE topical report. This is one of the line item TS improvements.

5. Fuel Transfer Canal Gate

In TS 3/4.5.2 ECCS shutdown and 3/4.5.3 Suppression Pool, the licensee would propose to change the note for the conditions under which ECCS and suppression pool are not required to be operable (Enclosure 2, sheets 4 and 5). Presently, the note requires the fuel transfer canal gate and spent fuel pool gate to be removed. The change would allow these gates to be in place so that leakage tests of the fuel transfer tube valves and trouble shooting of the fuel transfer mechanism could be accomplished. The staff said that the risk of loss of the upper pool as well as reduction in available water inventory should be considered in the safety analysis for this change.

6. Diesel Generator 24 Hour Test

Regarding TS 4.8.1.1.2(d), the licensee would like to perform the 24 hour test during power operation, to reduce the amount of testing during shutdown (Sheets 6 and 7, Enclosure 2). The staff indicated that this extended testing of diesel generators during power operation would significantly increase the probability of the simultaneous failure of both offsite power and one onsite diesel generator due to grid disturbances and that such testing has not been previously approved.

7. Deletion Of A Room Requiring Fire Detection

The licensee is planning to remove a wall between two rooms, making one larger room. Since the two rooms are listed in TS Table 3.3.7.9-1, one of the rooms will need to be deleted from the table after the change.

8. Snubber Reject Conditions

The licensee would like to delete the reject region on TS Figure 4.7.4.-1, "Sample Plan For Snubber Functional Test" (Sheet 8 of Enclosure 2). This would eliminate the need to test all snubbers for some test failures. The staff indicated this type of change has been considered previously.

9. Secondary Containment Boundary

The present secondary containment boundary includes the auxiliary building except for the railroad bay area. The licensee would like to change the secondary containment boundary to include the railroad bay area. This would allow movement of new fuel into the auxiliary building during power operation. This bay area was not included in the secondary containment because the door is not designed to withstand a tornado or seismic loading. The licensee would propose compensatory measures (e.g., a severe weather watch) during the time fuel is moved into the secondary containment. It is estimated that about one month per fuel cycle would be required to move fuel into the auxiliary building.

The staff requested that submittals for TS changes be upgraded. The safety analysis should describe the effect of the change on the safety function of associated equipment. The analysis to determine no significant hazards

consideration should identify the accidents involved and the margin of safety involved and give specific reasons why the change does not involve a significant increase in the probability or consequences of a previously analyzed accident or reduce the margin of safety.

/S/

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Enclosures:
As stated

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See attached list

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ENCLOSURE 1

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ENCLOSURE 2

POTENTIAL CHANGES TO TECHNICAL SPECIFICATIONS

TABLE 3.3.7.1-1

RADIATION MONITORING INSTRUMENTATION

INSTRUMENTATION	MINIMUM CHANNELS OPERABLE	APPLICABLE CONDITIONS	ALARM/TRIP SETPOINT	MEASUREMENT RANGE	ACTION
1. Component Cooling Water Radiation Monitor	1	At all times	$\leq 1 \times 10^5$ cpm/NA	10 to 10^6 cpm	70
2. Standby Service Water System Radiation Monitor	1/heat exchanger train	1, 2, 3, and*	$\leq 1 \times 10^5$ cpm/NA	10 to 10^6 cpm	70
3. [DELETED]					
4. [DELETED]					
5. Carbon Bed Vault Radiation Monitor	1	1, 2	$\leq$ 2 x full power background/NA	1 to 10^6 mR/hr	72
6. Control Room Ventilation Radiation Monitor	2/trip system(h)	1,2,3,5 and**	$\leq$4 mR/hr/ $\leq$5 mR/hr#	10^{-2} to 10^2 mR/hr	73
7. Containment and Drywell Ventilation Exhaust Radiation Monitor	2/trip system(h)	At all times	$\leq$2.0 mR/hr/ $\leq$4 mR/hr(b)#	10^{-2} to 10^2 mR/hr	74
8. Fuel Handling Area Ventilation Exhaust Radiation Monitor	2/trip system(h)	1,2,3,~~5~~ and***	$\leq$ 2mR/hr/ $\leq$4 mR/hr(d)#	10^{-2} to 10^2 mR/hr	75
9. Fuel Handling Area Pool Sweep Exhaust Radiation Monitor	2/trip system(h)	1, 2, 3 and*** ~~(c)~~	$\leq$ 18 mR/hr/ $\leq$35 mR/hr(d)#	10^{-2} to 10^2 mR/hr	75

*** when handling fuel, performing core alterations, or performing operations with a potential for draining the reactor vessel

TABLE 3.3.7.1-1 (Continued)

RADIATION MONITORING INSTRUMENTATION

INSTRUMENTATION	MINIMUM CHANNELS OPERABLE	APPLICABLE CONDITIONS	ALARM/TRIP SETPOINT	MEASUREMENT RANGE	ACTION
10. Area Monitors					
a. Fuel Handling Area Monitors					
1) New Fuel Storage Vault	1	(e)	$\leq$2.5 mR/hr/NA	10^{-2} to 10^{3} mR/hr	72
2) Spent Fuel Storage Pool	1	(f)	$\leq$2.5 mR/hr/NA	10^{-2} to 10^{3} mR/hr	72
3) Dryer Storage Area	1	(g)	$\leq$2.5 mR/hr/NA	10^{-2} to 10^{3} mR/hr	72
b. Control Room Radiation Monitor	1	At all times	$\leq$0.5 mR/hr/NA	10^{-2} to 10^{3} mR/hr	72

* With RHR heat exchangers in operation.
** When irradiated fuel is being handled in the primary or secondary containment.
\# Initial setpoint. Final Setpoint to be determined during startup test program. Any required change to this setpoint shall be submitted to Commission within 90 days after test completion.
(a) Trips system with 2 channels upscale-Hi Hi Hi, or one channel upscale Hi Hi Hi and one channel downscale or 2 channels downscale.
(b) Isolates containment/drywell purge penetrations.
(c) With irradiated fuel in spent fuel storage pool.
(d) Also isolates the Auxiliary Building and Fuel Handling Area Ventilation Systems.
(e) With fuel in the new fuel storage vault.
(f) With fuel in the spent fuel storage pool.
(g) With fuel in the dryer storage area.
(h) Two upscale Hi Hi, one upscale Hi Hi and one downscale, or two downscale signals from the same trip system actuate the trip system and initiate isolation of the associated isolation valves.

TABLE 3.3.7.1-1 (Continued)

RADIATION MONITORING INSTRUMENTATION

ACTION

ACTION 70 - With the required monitor inoperable, obtain and analyze at least one grab sample of the monitored parameter at least once per 24 hours.

ACTION 71 - [DELETED]

ACTION 72- With the required monitor inoperable, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.

ACTION 73 -

a. With one of the required monitors in a trip system inoperable, place the inoperable channel in the downscale tripped condition within one hour; restore the inoperable channel to OPERABLE status within 7 days, or, within the next 6 hours, initiate and maintain operation of at least one control room emergency filtration system in the isolation mode of operation.

b. With both of the required monitors in a trip system inoperable, initiate and maintain operation of at least one control room emergency filtration system in the isolation mode of operation within one hour.

ACTION 74 -

a. With one of the required monitors in a trip system inoperable, place the inoperable channel in the downscale tripped condition within one hour.

b. With two of the required monitors in a trip system inoperable, isolate the containment and drywell purge and vent penetrations within 12 hours.

ACTION 75 -

a. With one of the required monitors in a trip system inoperable, place the inoperable channel in the downscale tripped condition within one hour.

b. With two of the required monitors in a trip system inoperable, establish SECONDARY CONTAINMENT INTEGRITY with at least one standby gas treatment subsystem operating within 12 hours.

3/4 5.2 ECCS - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.5.2 At least two of the following shall be OPERABLE:

a. The low pressure core spray (LPCS) system with a flow path capable of taking suction from the suppression pool and transferring the water through the spray sparger to the reactor vessel.

b. Low pressure coolant injection (LPCI) subsystem "A" of the RHR system with a flow path capable of taking suction from the suppression pool upon being manually realigned and transferring the water to the reactor vessel.

c. Low pressure coolant injection (LPCI) subsystem "B" of the RHR system with a flow path capable of taking suction from the suppression pool upon being manually realigned and transferring the water to the reactor vessel.

d. Low pressure coolant injection (LPCI) subsystem "C" of the RHR system with a flow path capable of taking suction from the suppression pool upon being manually realigned and transferring the water to the reactor vessel.

e. The high pressure core spray (HPCS) system with a flow path capable of taking suction from one of the following water sources and transferring the water through the spray sparger to the reactor vessel:

1. From the suppression pool, or
2. When the suppression pool level is less than the limit or is drained, from the condensate storage tank containing at least 170,000 available gallons of water, equivalent to a level of 18 feet.

APPLICABILITY: OPERATIONAL CONDITION 4 and 5*.

ACTION:

a. With one of the above required subsystems/systems inoperable, restore at least two subsystems/systems to OPERABLE status within 4 hours or suspend all operations that have a potential for draining the reactor vessel.

b. With both of the above required subsystems/systems inoperable, suspend CORE ALTERATIONS and all operations that have a potential for draining the reactor vessel. Restore at least one subsystem/system to OPERABLE status within 4 hours or establish SECONDARY CONTAINMENT INTEGRITY within the next 8 hours.

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*The ECCS is not required to be OPERABLE provided that the reactor vessel head is removed, the cavity is flooded, the upper containment fuel pool gates are removed, ~~the spent fuel pool gates are removed~~, and water level is maintained within the limits of Specifications 3.9.8 and 3.9.9.

3/4.5.3 SUPPRESSION POOL#

LIMITING CONDITION FOR OPERATION

3.5.3 The suppression pool shall be OPERABLE:

a. In OPERATIONAL CONDITION 1, 2 or 3 with a contained water volume of at least 135,291 ft^3, equivalent to a level of 18'4-1/12."

b. In OPERATIONAL CONDITION 4 or 5* with a contained water volume of at least 93,600 ft^3, equivalent to a level of 12'8", except that the suppression pool level may be less than the limit or may be drained provided that:

   1. No operations are performed that have a potential for draining the reactor vessel,

   2. The reactor mode switch is locked in the Shutdown or Refuel position,

   3. The condensate storage tank contains at least 170,000 available gallons of water, equivalent to a level of 18', and

   4. The HPCS system is OPERABLE per Specification 3.5.2 with an OPERABLE flow path capable of taking suction from the condensate storage tank and transferring the water through the spray sparger to the reactor vessel.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4 and 5*.

ACTION:

a. In OPERATIONAL CONDITION 1, 2 or 3 with the suppression pool water level less than the above limit, restore the water level to within the limit within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. In OPERATIONAL CONDITION 4 or 5* with the suppression pool water level less than the above limit or drained and the above required conditions not satisfied, suspend CORE ALTERATIONS and all operations that have a potential for draining the reactor vessel and lock the reactor mode switch in the Shutdown position. Establish SECONDARY CONTAINMENT INTEGRITY within 8 hours.

except the fuel transfer canal gate

#See Specification 3.6.3.1 for pressure suppression requirements.

*The suppression pool is not required to be OPERABLE provided that the reactor vessel head is removed, the cavity is flooded or being flooded from the suppression pool, the upper containment fuel pool gates are removed when the cavity is flooded, and the water level is maintained within the limits of Specification 3.9.8 and 3.9.9.

c. At least once per 92 days and from new oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D270-1965 (reapproved 1980) has a water and sediment content of less than or equal to .05 volume percent and a kinematic viscosity @ 40°C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-77, and an impurity level of less than 2 mg. of insolubles per 100 ml. when tested in accordance with ASTM-D2274-70, except that the test of new fuel for impurity level shall be performed within 7 days after addition of the new fuel to the storage tank.

d. At least once per 18 months, during shutdown, by:

1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.

2. Verifying the diesel generator capability to reject a load of greater than or equal to 1200 kW (LPCS Pump) for diesel generator 11, greater than or equal to 550 kW (RHR B/C Pump) for diesel generator 12, and greater than or equal to 2180 kW (HPCS Pump) for diesel generator 13 while maintaining less than or equal to 75% of the difference between nominal speed and the overspeed trip setpoint, or 15% above nominal, whichever is less.

3. Verifying the diesel generator capability to reject a load of at least 5450 kW but not to exceed 5740 kW for diesel generators 11 and 12 and 3300 kW for diesel generator 13 without tripping. The generator voltage shall not exceed 5000 volts during and following the load rejection.

4. Simulating a loss of offsite power by itself, and:

a) For Divisions 1 and 2:

1) Verifying deenergization of the emergency busses and load shedding from the emergency busses.

2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the auto-connected shutdown loads through the load sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady state voltage and frequency of the emergency busses shall be maintained at 4160 ± 416 volts and 60 ± 1.2 Hz during this test.

b) For Division 3:

1) Verifying de-energization of the emergency bus.

2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency bus with the loads within 10 seconds and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady state voltage and frequency of the emergency bus shall be maintained at 4160 ± 416 volts and 60 ± 1.2 Hz during this test.

9. Verifying the diesel generator operates for at least 24 hours. Diesel generators 11 and 12 shall be loaded to greater than or equal to 5450 kW but not to exceed 5740 kW for 24 hours. Diesel generator 13 shall be loaded to greater than or equal to 3630 kW for the first 2 hours of this test and to 3300 kW during the remaining 22 hours. The generator voltage and frequency shall be 4160 ± 416 volts and 60 ± 1.2 Hz within 10 seconds after the start signal; the steady state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, perform Surveillance Requirement 4.8.1.1.2.d.7.a).2) and b).2)*.

10. Verifying that the auto-connected loads to each diesel generator do not exceed 5740 kW for diesel generators 11 and 12 and 3300 kW for diesel generator 13.

11. Verifying the diesel generator's capability to:

    a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,

    b) Transfer its loads to the offsite power source, and

    c) Be restored to its standby status.

12. Verifying that with the diesel generator operating in a test mode and connected to its bus that a simulated ECCS actuation signal:

    a) For Divisions 1 and 2, overrides the test mode by returning the diesel generator to standby operation.

    b) For Division 3, overrides the test mode by bypassing the diesel generator automatic trips per Surveillance Requirement 4.8.1.1.2.d.8.b).

13. [DELETED]

14. [DELETED]

15. Verifying that the automatic load sequence timer is OPERABLE with the interval between each load block within ± 10% of its design interval for diesel generators 11 and 12.

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*If Surveillance Requirement 4.8.1.1.2.d.7.a)2) or b)2) are not satisfactorily completed, it is not necessary to repeat the preceding 24 hour test. Instead, the diesel generator may be operated at the load specified by Surveillance Requirement 4.8.1.1.2.a.5 for one hour or until operating temperatures have stabilized.

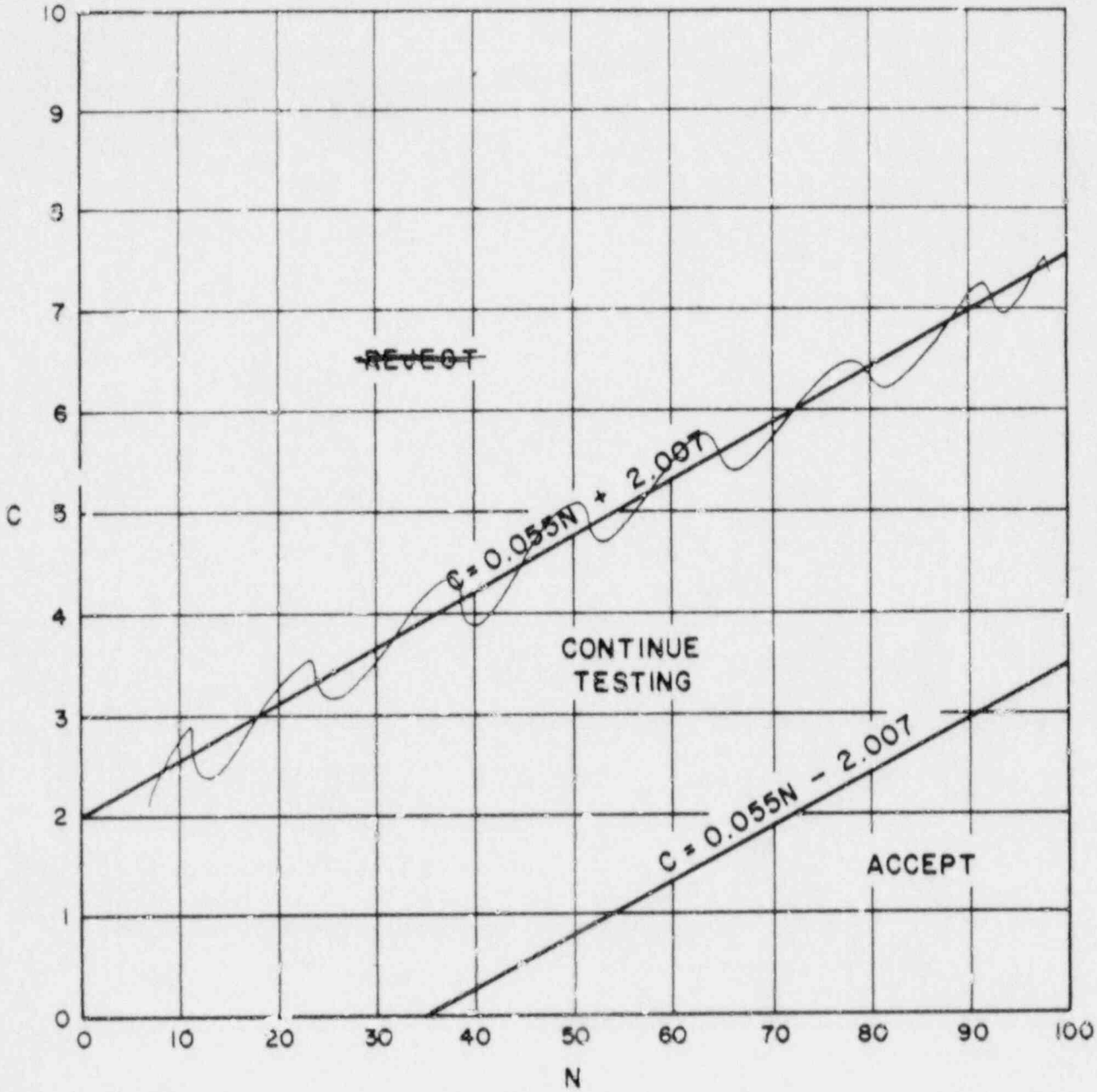

FIGURE 4.7.4-1
(SAMPLE PLAN 2) FOR SNUBBER FUNCTIONAL TEST

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