



GULF STATES UTILITIES COMPANY

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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Gulf States Utilities (GSU) Company hereby files an application to amend the River Bend Station - Unit 1 Facility Operating License NPF-47, pursuant to 10CFR50.90. This application is filed to incorporate the provisions of Generic letter 87-09 regarding revision to Technical Specifications 3.0.4, 4.0.3 and 4.0.4. The Attachment to this letter provides the justifications and Enclosure 1 provides the proposed revisions to the Technical Specifications. Enclosure 2 provides revised Bases for Sections 3.0 and 4.0 of the River Bend Station - Unit 1 Technical Specifications.

Pursuant to 10CFR170.12, GSU has enclosed a check in the amount of one-hundred and fifty dollars (\$150.00) for the license amendment application fee. Your prompt attention to this application is appreciated.

Sincerely

J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

JEB
JEB/LAE/PK/DAS/ch

Attachment

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Acc 1
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)

PARISH OF WEST FELICIANA)

In the Matter of)

GULF STATES UTILITIES COMPANY)

Docket No. 50-458

(River Bend Station - Unit 1)

AFFIDAVIT

J. E. Booker, being duly sworn, states that he is Manager-River Bend Oversight for Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; that he has read all of the statements contained in such documents attached thereto and made a part thereof; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

J. E. Booker
J. E. Booker

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 30th day of September, 19 88. My Commission expires with Life.

Claudia J. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT

GULF STATES UTILITIES COMPANY
RIVER BEND STATION
DOCKET 50-458/LICENSE NO. NPF-47

Applicability of Limiting Conditions
for Operations and Surveillance Requirements

Licensing Document involved: Technical Specifications
Items: (See Enclosure 1) Pages: (See Enclosure 1)

REASON FOR REQUEST

A proposed change is being requested in accordance with 10CFR50.90 and Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." Accordingly, this proposed change will: (1) revise Specification 3.0.4 to eliminate unnecessary restrictions on mode changes when remedial ACTION requirements are being complied with and to correct inconsistent applications of exceptions to Specification 3.0.4, (2) revise Specification 4.0.3 to preclude unnecessary immediate shutdowns when surveillance intervals are inadvertently exceeded, and (3) revise Specification 4.0.4 to resolve possible conflicts with Specification 4.0.3.

Gulf States Utilities Company (GSU) requests this amendment be reviewed by December 31, 1988 such that the increased operational flexibility allowed by Generic Letter 87-09 may be implemented during the second refueling outage at River Bend Station which is currently scheduled to begin March 15, 1989. The enhancements contained in this request provide for significant improvements in River Bend Station's (RBS) outage schedules.

Additionally, this proposed change will make an editorial correction to Technical Specification Table 3.3.7.1-1, ACTION 73 to specify STARTUP, in lieu of HOT STANDBY, to be consistent with the defined Operational Conditions of the RBS Technical Specifications.

DESCRIPTION

Generic Letter 87-09 discusses three problem areas regarding the general requirements of Sections 3.0 and 4.0 of the Standard Technical Specifications on the applicability of Limiting Conditions for Operation (LCO) and surveillance requirements. The guidance provided in Generic Letter 87-09 addresses alternatives to the Standard Technical Specifications to resolve these three problem areas.

Specification 3.0.4 has been found by the industry and the NRC Staff to unduly restrict facility operation when conformance to the ACTION requirements provides an acceptable level of safety for continued operation. Additionally, exceptions to Specification 3.0.4 have been

inconsistently applied. This is the first problem area addressed in Generic Letter 87-09.

There are two basic types of ACTION statements contained in the Technical Specifications. The first type of ACTION statement requires compliance with the LCO to be restored within a specified time limit (Allowable Outage Time (AOT) limit). If this AOT limit is exceeded, the unit is required to be placed in a condition where the LCO or the specific ACTION requirements no longer apply. The second type of ACTION statements provide remedial actions to be taken. Remedial ACTION statements are those that do not restore compliance with the LCO and do not place the unit in a condition where the LCO or ACTION requirements no longer apply. Therefore, they allow continued plant operation for an unlimited period of time as long as the specified remedial actions are complied with. This ACTION type includes those which require a plant shutdown if the remedial actions are not met as well as those ACTION requirements that specify remedial actions if an AOT limit is exceeded. When the ACTION statement requires a report, the time allowed to restore compliance with the LCO and the time allowed to submit the report is not considered an AOT limit. Therefore, these ACTION statements are considered to be remedial and do not prohibit a mode change while within these time limits. All Technical Specification ACTION requirements are divided into four groups, as identified below, according to the impact the proposed change to Specification 3.0.4 has on the ACTION requirement.

As addressed in Generic Letter 87-09, for an LCO that has ACTION requirements permitting continued operation for an unlimited period of time (i.e., remedial ACTION statements), entry into an operational mode or other specified condition should be permitted in accordance with those ACTION requirements as long as the remedial ACTIONS, exclusive of the AOT limit, are complied with. The restriction on changes in Operational Conditions should apply only where the ACTION statement requires compliance with the LCO to be restored within a specified time interval.

Accordingly, this proposed change involves revising Specification 3.0.4 to conform with that provided in Generic Letter 87-09. As a consequence of this revision to Specification 3.0.4, individual specifications with ACTION requirements permitting continued operation for an unlimited period of time no longer need to indicate that Specification 3.0.4 is not applicable. These are the first group of Technical Specification ACTION requirements and the applicable Technical Specifications are listed on Enclosure 1. Additionally, Technical Specifications 3.1.3.3, 3.1.3.4, 3.3.7.1, 3.3.7.10, 3.3.7.11 and 3.6.1.4 currently indicate that Specification 3.0.4 is not applicable and are comprised of both shutdown and remedial ACTION requirements. Accordingly, the exceptions to Specification 3.0.4 currently contained in these Technical Specifications have been moved to apply only to the appropriate shutdown ACTION requirements. It is being requested that the specific Technical Specifications identified on Enclosure 1 be revised to relocate or delete, as applicable, the noted exception to Specification 3.0.4 to avoid confusion about its applicability.

Generic Letter 87-09 goes on to state that exceptions to Specification 3.0.4 should not be deleted for individual Technical Specifications if a mode change would be precluded by Specification 3.0.4 as proposed.

Therefore, exceptions to Specification 3.0.4 will remain as currently approved for Technical Specifications 3.1.3.5, 3.3.7.4, 3.3.7.7, 3.4.3.2, 3.4.4, 3.4.9.1, 3.7.5, 3.7.6.1, 3.11.1.4 and 3.11.2.6. These are the second group of Technical Specification ACTION requirements. Additionally, as a result of the revision to Specification 3.0.4, the remaining Technical Specifications where Specification 3.0.4 is currently applicable (i.e., a mode change is currently prohibited) have been reviewed to determine which ACTION requirements will now allow a change in Operational Conditions in accordance with the proposed Specification 3.0.4. These are the third group of Technical Specification ACTION requirements. In each of these cases it was confirmed that the remedial actions previously approved do indeed provide an acceptable level of safety for continued plant operation. Therefore, it is concluded that the proposed allowance for a change in Operational Conditions is acceptable provided the remedial actions, exclusive of the AOT limits, are being complied with. The fourth group of Technical Specification ACTION requirements are those where the revised Specification 3.0.4 will not allow a mode change and a mode change is currently prohibited by the existing Specification 3.0.4. For these ACTION statements, plant operation will remain the same (i.e., mode changes will be prohibited) as currently specified.

Consistent with the revised Bases for Specification 3.0.4, this proposed change does not endorse the failure to exercise good practice in restoring systems or components to operable status before plant startup. To this end, GSU will continue to maintain the current high priorities for performing maintenance on Technical Specification related equipment.

To address the second problem area discussed in Generic Letter 87-09 related to unnecessary immediate shutdowns when surveillance intervals are inadvertently exceeded, the Generic Letter provided a revised Specification 4.0.3. Specification 4.0.3 currently states that the failure to perform a surveillance within the specified time interval constitutes a failure to meet the LCO's Operability requirements. Consequently, if a surveillance interval is inadvertently exceeded, the LCO's ACTION requirements must be met just as when a surveillance determines that a system or component is inoperable. Usually, the ACTION requirements include an AOT limit that permits completion of the missed surveillance within this time interval, thus satisfying Specification 4.0.3. However, if the surveillance is not completed within the AOT limit or no such AOT limit is specified, immediate plant shutdown would usually be required per Specification 3.0.3.

As stated in Generic Letter 87-09, it is overly conservative to assume that systems or components are inoperable solely because a surveillance requirement has not been performed. A large majority of surveillances do, in fact, demonstrate that systems or components are operable. When a surveillance is missed, it is the verification of operability that is in question. Because the ACTION requirements of some Technical Specifications have AOT limits that do not provide adequate time to perform the missed surveillance before the ACTION requirements mandate a shutdown, the Technical Specifications should allow a delay of the shutdown requirements for a specified time to permit the performance of the missed surveillance.

If a plant shutdown is required by the associated ACTION requirements before a missed surveillance is completed, it is likely that it would be

conducted while the plant is being shutdown since completion of the missed surveillance would terminate the shutdown requirement. This is undesirable since it has the potential to increase the risk to the safe operation of the plant and impact public safety. As described in Generic Letter 87-09, 24 hours is an acceptable time limit for completion of a missed surveillance when the AOT limits of the ACTION statement are less than this time limit. This proposed time limit is based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance as well as the safety significance of the delay in completion of the surveillance. This proposed 24 hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with ACTION requirements before the surveillance can be completed.

The time limits of ACTION requirements for surveillances would start when it is identified that a surveillance requirement has not been performed, except when the 24 hour delay is allowed. Where the 24 hour delay is allowed, the time limits of the ACTION requirements would start either at the end of the 24 hour limit if the surveillance has not been completed or at the time the system or component is found to be inoperable. When plant conditions preclude performance of the required surveillance, the plant must either shutdown to perform the surveillance or obtain a temporary waiver from the surveillance requirement. The latter would result in an amendment to the Technical Specifications and the 24 hour time limit would allow time to obtain the temporary waiver.

To address the third problem area discussed in Generic Letter 87-09 with regard to conflicts between Specifications 4.0.3 and 4.0.4, the Generic Letter provided a revised Specification 4.0.4. Specification 4.0.4 prohibits entry into an Operational Condition when surveillance requirements have not been performed within the specified surveillance interval. A conflict with this Specification exists when a mode change is required as a consequence of shutdown ACTION requirements and the surveillance requirements that become applicable due to the mode change have not been performed within the specified surveillance interval. It is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with ACTION requirements and it should not apply when mode changes are imposed by ACTION requirements. Therefore, Generic Letter 87-09 provided a revision to Specification 4.0.4 which states that it shall not prevent passage through or to Operational Conditions as required to comply with ACTION requirements. A similar provision is already included in Specification 3.0.4.

Secondly, the unit may have to be placed in a lower Operational Condition than the one required by the original shutdown ACTION requirement as a result of the surveillance requirements of the associated LCO just entered not being complete. This second problem has been resolved by the proposed change to Specification 4.0.3 to permit a delay of up to 24 hours in the applicability of the ACTION requirements.

The last conflict between Specifications 4.0.3 and 4.0.4 relates to those situations in which an exception to Specification 4.0.4 is allowed. An

exception to Specification 4.0.4 is allowed when surveillance requirements can be completed only after entry into an operational mode or specified condition for which they apply. However, upon entry into the Operational Condition, Specification 4.0.3 may not be met because the surveillance requirements may not have been performed within the required surveillance interval. Generally, these surveillance requirements apply to redundant systems, and Specification 3.0.3 would thus apply because they are treated as inoperable under Specification 4.0.3. Therefore, allowance of an exception to Specification 4.0.4 can create a conflict with Specification 4.0.3. However, as identified in Generic Letter 87-09, the proposed revision to Specification 4.0.3 to permit a delay of up to 24 hours in the applicability of the ACTION requirements allows an appropriate time limit for the completion of those surveillance requirements that become applicable when an exception to Specification 4.0.4 is allowed.

Additionally, Technical Specification Table 3.3.7.1-1, Action 73 is being revised to specify STARTUP, in lieu of HOT STANDBY. This change is being proposed to be consistent with the defined Operational Conditions in the RBS Technical Specifications. There is currently no defined Operational Condition for HOT STANDBY in the RBS Technical Specifications. STARTUP is defined as any coolant temperature with the mode switch in the Startup/Hot Standby position.

SIGNIFICANT HAZARDS CONSIDERATION

In accordance with the requirements of 10CFR50.92, the following discussions are provided in support of the determination that no significant hazards are created or increased by the changes proposed in this amendment request.

1. No significant increase in the probability or the consequences of an accident previously evaluated results from this request because:

GSU has evaluated these proposed changes as they apply to RBS and has concluded that they conform with the guidance provided in Generic Letter 87-09. The proposed changes implement improvements in three problem areas as discussed in the Generic Letter.

Resolution to the first problem area addressed in Generic Letter 87-09 revises Specification 3.0.4 of the Standard Technical Specifications for BWR's which is applicable to RBS. This change will allow placing RBS in a higher Operational Condition when a LCO has not been met only when the ACTION requirements being relied upon are being complied with exclusive of the AOT limit and permit continued operation of the facility for an unlimited period of time. Consistent with the guidance provided in the Generic Letter, this is acceptable since compliance with the applicable ACTION requirements will provide an adequate level of safety and will presently allow continued operation for an unlimited period of time once the higher Operational Condition is obtained. The RBS Technical Specifications have been reviewed and GSU has confirmed that all current remedial ACTION statements do provide an acceptable level of safety for continued plant operation for an unlimited period of time and therefore, no change to the plant response to any event as described in the safety analysis report results.

Resolution to the second problem area addressed in Generic Letter 87-09 revises Specification 4.0.3 by allowing up to a 24 hour time limit to complete a missed surveillance requirement before the unit is required to initiate the requirements of the ACTION statement. Surveillances are required to demonstrate that systems or components are operable. Since the large majority of surveillances are successful, the mere fact that a surveillance is missed does not indicate that a system or component is inoperable. The proposed 24 hour delay is based upon considerations to allow adequate planning, resource (personnel, material) staging and performance of the surveillance or to allow sufficient time for regulatory action (temporary waiver or license amendment) if the surveillance can not be performed. This time limit also allows for completion of surveillances that become applicable as a consequence of Operational Condition changes imposed by ACTION requirements. Consistent with the guidance provided in the Generic Letter, this proposed change is acceptable since it is overly conservative to assume that a system or component is inoperable solely due to a missed surveillance and the proposed change reduces the potential for plant upset when ACTION requirements do not allow adequate time to perform the missed surveillance. The time limits of ACTION requirements would become applicable if it is determined that the affected equipment is inoperable and therefore, the plant will be required to be placed in a condition (configuration) within the current safety analysis as required by the Technical Specifications.

Resolution to the third problem area addressed in Generic Letter 87-09 revises Specification 4.0.4 to address conflicts between Specifications 4.0.3 and 4.0.4. The first area of conflict arises because Specification 4.0.4 does not allow entry into an Operational Condition when the applicable surveillances have not been performed. This requirement can result in a conflict when a mode change is required by ACTION statements and the surveillance requirements that become applicable have not been performed within the required intervals. The proposed change to Specification 4.0.3 states that it shall not prevent passage through or to Operational Conditions required to comply with ACTION statements. A similar provision is already included in Specification 3.0.4. This provision, when coupled with the proposed change to Specification 4.0.3 allowing a delay of up to 24 hours to perform the surveillance before applying the shutdown requirements of the ACTION statement, allows the plant to be placed in the Operational Condition specified by the ACTION requirements while still allowing surveillances to be performed in a timely manner.

Another area of conflict with regard to Specifications 4.0.3 and 4.0.4 is when surveillance requirements can only be completed after entry into the Operational Condition where they apply. These Technical Specifications currently contain an exception to Specification 4.0.4. As identified in the Generic Letter, the proposed change to Specification 4.0.3 will permit a delay of up to 24 hours in the applicability of the ACTION requirements to allow appropriate time for the completion of the surveillance where specific exception to the requirements of 4.0.4 are required.

Consistent with the guidance provided in the Generic Letter, this is acceptable since the change to 4.0.4 resolves conflicts with 4.0.3 and allows the plant to be placed in the Operational Condition prescribed by the Technical Specifications and thereby, maintaining the conditions assumed in the current safety analysis.

The proposed change to Technical Specification Table 3.3.7.1-1, ACTION 72 is editorial only. As such, this proposed change cannot increase the probability or the consequences of any accident previously evaluated. STARTUP is the appropriate defined Operational Condition for RBS.

2. This request would not create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed changes to Specification 3.0.4 are to allow placing RBS in a higher Operational Condition only when continued compliance with the ACTION requirements will maintain the plant within the assumptions of the current safety analysis. Therefore, the proposed changes do not affect the design or configuration of RBS as assumed in the current safety analysis.

The proposed changes to Specification 4.0.3 are to allow sufficient time to complete inadvertently missed surveillances. If the equipment in question is determined to be inoperable, compliance with applicable ACTION requirements must be completed, thereby placing the plant in a condition within the current safety analysis.

The proposed changes to Specification 4.0.4, when coupled with the proposed changes to Specification 4.0.3, will allow a change to the plant Operational Condition when the associated surveillance requirement has not been satisfied within the specified interval provided the requirements of the ACTION statement are initiated if the component is found to be inoperable or within 24 hours if the surveillance has not been completed. As discussed above, compliance with the ACTION requirements will place the plant within the current safety analysis.

The proposed change to Technical Specification Table 3.3.7.1-1, ACTION 73 is editorial only and therefore, does not introduce any new operating or failure modes. STARTUP is the appropriate defined Operational Condition for RBS.

With each of the proposed changes the design and configuration required by the operating license is unchanged and the requirements of the current safety analysis are maintained; therefore, no new events have been introduced by the proposed changes.

3. This request would not involve a significant reduction in the margin of safety because:

The proposed changes to Specification 3.0.4 allow plant startups under conditions in which conformance with the ACTION requirements establishes an acceptable level of safety for continued operation for

an unlimited period of time as previously approved. Startup would still be prohibited when the ACTION requirements provide no remedial action for continued plant operation. The proposed change to Specification 4.0.3 allows an appropriate time for performing a missed surveillance before shutdown requirements apply. This proposed time limit is based upon appropriate consideration of plant conditions, adequate planning, availability of personnel, and the time to perform the surveillance. As recognized by the NRC Staff in the Generic Letter, it is overly conservative to assume that systems or components are inoperable solely because a required surveillance has not been performed. Therefore, allowing sufficient time to perform the surveillance reduces the risk of plant upset while performing the missed surveillance and therefore, does not significantly reduce the margin of safety.

The final proposed changes to Specification 4.0.4 are clarification only to permit passage through or to Operational Conditions as required to comply with ACTION requirements even though a surveillance requirement may not have been performed. The proposed revision would also permit mode changes when a surveillance requirement has not been met and can only be completed after entering into the Operational Condition where it is applicable. This proposed change does not significantly reduce the margin of safety, but in fact, potentially increases the margin of safety by permitting entry into lower modes of operation as required to comply with ACTION requirements.

The proposed change to Technical Specification Table 3.3.7.1-1, Action 73 is editorial only and therefore, cannot reduce the margin of safety. STARTUP is the appropriate defined Operational Condition for RBS.

Based upon the above considerations, the proposed changes do not result in a significant increase in the probability or the consequences of any accident previously evaluated, do not create the possibility of a new or different kind of accident than previously evaluated and do not result in a significant reduction in the margin of safety. Therefore, GSU proposes that no significant hazards considerations are involved with approval of the proposed changes.

REVISED TECHNICAL SPECIFICATION

The requested revisions are provided in Enclosure 1.

SCHEDULE FOR ATTAINING COMPLIANCE

River Bend Station is currently in compliance with the applicable Technical Specifications. To provide the operational flexibility required in obtaining the current RBS refueling outage schedule, GSU requests this proposed change be approved by December 31, 1988. This will allow advanced planning prior to the refueling outage which is currently scheduled to begin March 15, 1989.

NOTIFICATION OF STATE PERSONNEL

A copy of this amendment application has been provided to the State of Louisiana, Department of Environmental Quality-Nuclear Energy Division.

ENVIRONMENTAL IMPACT APPRAISAL

Gulf States Utilities Company (GSU) has reviewed the proposed Technical Specification changes against the criteria of 10CFR51.22 for environmental considerations. As shown above, the proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, GSU concludes that the proposed changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.