SYSTEM ENERGY RESOURCES, INC.

OLIVER D. KINGSLEY, JR
Vice President
Nuclear Operations

June 21, 1988

U. S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D. C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Proposed Amendment to the Operating License (PCOL-88/05) - Revision to the No Significant Hazards Consideration
AECM-88/0115

Reference: AECM-88/0049, April 8, 1987; Proposed Amendment to the Operating License (PCOL-88/05)

System Energy Resources, Inc. (SERI) is submitting by this letter a revision to the no significant hazards consideration for proposed amendment PCOL-88/05. The proposed amendment PCOL-88/05 regards Technical Specification Table 4.8.1.1.2-1 concerning Diesel Generator Test schedule. The no significant hazards consideration was revised based on conversations with the NRC on April 13 and May 18, 1988.

In accordance with the provisions of 10 CFR 50.4, the original of the revised no significant hazards consideration is enclosed and the appropriate copies will be distributed. PCOL-88/05 (Reference) provided the technical justification and discussion to support the requested amendment. This revision has been reviewed and accepted by the Plant Safety Review Committee. The Safety Review Committee reviewed the technical content and safety concerns and approved the proposed amendment at the time of the original submittal.

Based on the guidelines presented in 10 CFR 50.92, SERI has concluded that this proposed amendment involves no significant hazards considerations.

An application fee has not been enclosed in this submittal because it was previously included in the Reference.

Yours truly,

ODK:bms
Attachments: 1. Affirmation per 10 CFR 50.30
2. Revised No Significant Hazards Consideration for PCOL-88/05

cc: (See Next Page)
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cc: Mr. T. H. Cloninger (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)
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Dr. Alton B. Cobb (w/a)
State Health Officer
State Board of Health
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

AFFIRMATION

I, O. D. Kingsley, Jr., being duly sworn, state that I am Vice President, Nuclear Operations of System Energy Resources, Inc.; that on behalf of System Energy Resources, Inc., and South Mississippi Electric Power Association I am authorized by System Energy Resources, 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, Nuclear Operations of System Energy Resources, 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.

O. D. Kingsley, Jr.

STATE OF MISSISSIPPI
COUNTY OF HINDS

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 21st day of June, 1988.

(SEAL)

Jeanne Ann Scales
Notary Public

My commission expires:

My Commission Expires Sept. 21, 1991

D. NO SIGNIFICANT HAZARDS CONSIDERATION

SERI has evaluated the proposed amendment and considers it not to involve a significant hazards consideration for the following reasons:

1. This change does not involve a significant increase in the probability or consequence of an accident previously evaluated.

   a. The proposed change involves no hardware changes or functional modifications to the diesel generators. The proposed change affects only the frequency at which surveillances are performed and does not affect either the limiting conditions for operations, or the operability requirements for the diesel generators. The effects of the reduced reliability goal are offset by the approved maintenance and surveillance program implemented by SERI. Diesel generator reliability is established and maintained primarily by a comprehensive maintenance and surveillance program. This reliability is then demonstrated by testing. SERI's maintenance and surveillance program has been successful in establishing an overall current diesel generator reliability of 0.983. This reliability has been very stable, ranging from a low of .980 to a high of .987. The current technical specification testing requirements have resulted in excessive diesel generator testing over an extended period of time. SERI believes that excessive testing over a long period of time will degrade the overall reliability of the diesel generators. The proposed change modifies the required testing frequency in an effort to improve overall diesel generator reliability by avoiding excessive testing and subsequent degradation.

   Long term diesel generator reliability is continually trended by SERI. To provide an early indication of degradation in diesel generator reliability, an increase in testing frequency has been added based on a smaller sample size as well as a requirement for 7 consecutive failure-free demands to terminate this increased frequency.

   The intent of the change is to reduce excessive testing while maintaining the overall diesel generator reliability. The test schedule as revised will continue to detect significant degradation in diesel generator reliability. As such, the proposed change does not significantly impact the diesel generator reliability.

   Therefore, this change does not involve a significant increase in the probability of diesel generator failure when required to actuate during an accident previously evaluated.

b. The proposed change does not significantly affect the consequences of a previously evaluated accident because the design and function of the diesel generators remain as previously analysed. Previously analysed accident consequences remain unchanged and so this change does not involve a significant increase in the consequences of an accident previously evaluated.

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

   As described in #1 above, the proposed change does not significantly impact the diesel generator reliability. In addition, no hardware changes are being made and the functions of the diesel generators are not being modified. Because the diesel generators would not be significantly changed, in function or reliability, the change would not create the possibility of a new or different kind of accident from any previously evaluated.

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

   No hardware changes are being made and the functions of the diesel generators (loads, start times, etc.) are not being modified. As such, the proposed change clearly maintains the diesel generator design requirements and criteria and the ability of the diesel generators to perform as described in the FSAR. Therefore, the proposed change does not in olve a significant reduction in the margin of safety.