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AREA CODE 504 838-6094 346-8651

June 21, 1988 RBG- 28118 File Nos. G9.5, G9.8.9.6

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 Company (GSU) hereby files an amendment to the River Bend Station (RBS) Unit 1 Technical Specifications, Appendix A to Facility Operating License NPF-47, pursuant to 10CFR50.90. This application is filed to revise Technical Specification 6.8.4.d due to proposed changes to the Asiatic Clam Control Program. These proposed changes were submitted March 30, 1988 and are pending NRR and Region IV review and approval.

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

Sincerely,

Senior Vice President River Bend Nuclear Group

JCD/JEB/LAE/

Attachments

A001 w/check

cc: U. S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011

> Senior Resident Inspector Post Office Box 1051 St. Francisville, LA 70775

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

Mr. William H. Spell, Administrator Nuclear Energy Division Louisiana Department of Environmental Quality P.O. Box 14690 Baton Rouge, LA 70898

# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA	)	
PARISH OF WEST FELICIANA	)	Docket No. 50-458
In the Matter of	)	DOCKEL NO. 30-436
GULF STATES UTILITIES COMPANY	)	
(River Bend Station - Unit 1)		

#### AFFIDAVIT

J. C. Deddens, being duly sworn, states that he is a Vice President of 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; and that all such documents are true and correct to the best of his knowledge, information and belief.

J. C. Deddens

Claudia J. Hurst

Claudia F. Hurst

Notary Public in and for

West Feliciana Parish, Louisiana

#### ATTACHMENT 1

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

#### ASIATIC CLAM CONTROL PROGRAM

LICENSING DOCUMENT INVOLVED: Technical Specifications

ITEM: 6.8.4.d PAGE: 6-15

REFERENCE: Letter from J.E. Booker to NRC, dated March 30, 1988.

### REASON FOR REQUEST:

A change is being requested in accordance with 10CFR50.90 to revise the current Technical Specification (TS) 6.8.4.d. This change is needed to bring the TS into agreement with proposed changes to the Asiatic Clam Control Program (ACCP) currently pending review and approval of NRR and Region IV. GSU's request for approval of changes to the ACCP was submitted by the referenced letter.

#### DESCRIPTION:

The proposed change to TS 6.8.4.d. includes: a) deletion of the requirement for NRC Staff approval of the ACCP prior to introduction of river water to plant systems, and b) revision of the requirement for procedures to detect Corbicula in the Mississippi River.

GSU submitted the ACCP for NRC Staff review and approval on June 21, 1985 and revised it by letter dated September 24, 1985. The NRC responded with an approval letter dated September 27, 1985. Mississippi River water was first introduced into plant cooling systems in November 1985. Since the requirement has been met for NRC Staff approval of the program prior to introduction of river water, GSU proposes this requirement be deleted from the Technical Specifications. Currently, all changes to the ACCP are approved by the NRC and Region IV prior to implementation.

The content required in the administrative controls section of the TS is specified in 10CFR50.36.c(5). This regulation requires that the TS contain the controls and provisions that are necessary to assure operation of the facility in a safe manner. As indicated in the referenced letter and in discussions with the Staff, the requirement for monitoring to detect the presence or relative abundance of Corbicula in the Mississippi River channel has been proposed for deletion. The intent of this monitoring was to determine if a meaningful relationship exists between the method of sampling ambient densities of young clams in the source water and the method of sampling the clarifier influent. The relationship of these two

methods and sampling locations has been documented since the ACCP was implemented. Of the two locations, data on young clam densities in the clarifier influent is more relevant than that of the river channel in determining the removal efficiency of the clarifiers. This activity did not involve any impact on the safe operation of the facility.

The only path of Mississippi River water intake to the RBS circulating/service water system is via the makeup pumps located in the embayment area (see attached figure). Monitoring for adult/large juvenile clams will continue in the embayment where plant cooling water makeup is withdrawn (Mississippi River water). Also, larval/smaller juvenile clams will continue to be monitored in the influent to the clarifiers. For these reasons, GSU concludes that suspension of river channel sampling will not decrease the effectiveness of the ACCP to monitor the presence of Corbicula in the source of makeup water to the cooling tower circulating/service water system.

## NO SIGNIFICANT HAZARDS CONSIDERATION:

As discussed in 10CFR50.92, the following discussions are provided to the NRC Staff in support of a "no significant hazards consideration" determination.

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

The proposed deletion from RBS TS does not affect plant operations. GSU believes that the current river channel sampling has been of little assistance in ensuring that the objectives of the administrative control requirements are met.

Biofouling of safety-related components by <u>Corbicula</u> does not increase the probability of an accident previously evaluated. Therefore, accident initiating events involving equipment susceptible to biofouling are not addressed in the current safety analysis. Safety-related components served by service water only mitigate the consequences of an accident and are not initiators of analyzed accidents.

The prevention and detection elements of the ACCP, such as performance trending of safety-related components, visual inspection of components, and chlorination of the normal service water system, continue to provide redundant assurance that safety-related components will be available to perform their intended function following an incident. No changes to the prevention and detection elements are being requested. This proposed change involves only the suspension of river channel monitoring.

2) This change would not create the possibility of a new or different kind of accident from any accident previously evaluated because: This proposed change does not affect plant equipment, physical features, or the required staffing or qualifications of plant personnel as currently required in TS Section 6.0. Specific operational requirements are required elsewhere in the TS that bear more directly on operational safety than river channel sampling.

The implications of biofouling by bivalve organisms such as Corbicula have been identified in IE Bulletin 81-03 and as a generic safety issue (GSI #51). The implications of Corbicula biofouling at RBS were evaluated and the ACCP was found acceptable in SER Supplement No. 5 Section 9.2.1. The propose change does not create the possibility of an accident new or different from those evaluations mentioned above since the ACCP assumes that Corbicula will be introduced into plant systems. The element of the ACCP regarding the monitoring for Corbicula in the source water is not diminished by the deletion of monitoring in the Mississippi River channel since monitoring will continue for adult/large juvenile clams in the embayment makeup pump area and for larval/smaller juvenile clams in the clarifier influent. Therefore, the effectiveness of the ACCP will not be decreased by these proposed changes. Prevention and early detection of biofouling within these systems continues to assure that safety-related systems will not be prevented from performing their intended functions.

3) This change would not involve a significant reduction in the margin of safety because:

The proposed change affects only Section 6.0, Administrative Controls, of the TS. No technical limits are changed or reduced by this proposed amendment. The monitoring for presence or relative abundance of Corbicula in the Mississippi River channel is not essential to the safe operation of the facility. Relevant monitoring for Corbicula detection and prevention in the source water will continue to be performed as part of the approved ACCP. Suspension of river channel sampling from TS Section 6.0 represents no reduction in safety requirements. In addition, this proposed change does not reduce the margin of safety as defined in the basis of the RBS TS. Therefore, GSU proposes that the requested amendment does not involve a significant reduction in the margin of safety.

# REVISED TECHNICAL SPECIFICATION:

The requested revision is enclosed.

# SCHEDU FOR ATTAINING COMPLIANCE:

Procedured implementing the ACCP will be revised upon approval by NRR and Region IV of this TS change and of the ACCP changes requested by the referenced letter.

# NOTIFICATION OF STATE PERSONNEL:

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

# ENVIRONMENTAL IMPACT APPRAISAL:

This proposed change will not result in an environmental impact beyond that previously analyzed nor does it change any previous environmental impact statements for RBS. In fact, the impact in this case is of the environment (Corbicula) on the facility (RBS) rather than the converse. Protection of the environment from the operation of the facility is not relevant to these changes.

