



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 2, 2021

Vice President, Operations
Entergy Operations, Inc.
River Bend Station
5485 US Highway 61
St. Francisville, LA 70775

SUBJECT: RIVER BEND STATION, UNIT 1 - ISSUANCE OF AMENDMENT NO. 208
TO ADOPT GENERIC LETTER 86-10 STANDARD LICENSE CONDITION FOR
FIRE PROTECTION (EPID L-2020-LLA-0246)

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 208 to Renewed Facility Operating License (RFOL) No. NPF-47 for River Bend Station, Unit 1. The amendment consists of changes to RFOL No. NPF 47 in response to your application dated November 2, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20307A647).

The amendment revises License Condition 2.C.(10), "Fire Protection (Section 9.5.1, SER [Safety Evaluation Report] and SSER [Supplement to Original SER] 3)," by replacing the current wording with wording from Generic Letter 86-10, "Implementation of Fire Protection Requirements" (ADAMS Accession No. ML031150322), and deleting Attachment 4 of the RFOL, "Fire Protection Program Requirements."

A copy of the related safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Perry H. Buckberg, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-458

Enclosures:

1. Amendment No. 208 to NPF-47
2. Safety Evaluation

cc: Listserv



UNITED STATES
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ENERGY LOUISIANA, LLC

AND

ENERGY OPERATIONS, INC.

DOCKET NO. 50-458

RIVER BEND STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 208
Renewed License No. NPF-47

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated November 2, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes as indicated in the attachment to this license amendment, and paragraph 2.C.(10) of Renewed Facility Operating License No. NPF-47 is hereby amended to read, as follows:

(10) Fire Protection (Section 9.5.1, SER and SSER 3)

EOI shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, and as approved in the SER dated May 1984 and Supplement 3 dated August 1985 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3. This amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jennifer L. Dixon-Herrity, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-47

Date of Issuance: July 2, 2021

ATTACHMENT TO LICENSE AMENDMENT NO. 208

RENEWED FACILITY OPERATING LICENSE NO. NPF-47

RIVER BEND STATION, UNIT 1

DOCKET NO. 50-458

Replace the following pages of the Renewed Facility Operating License No. NPF-47 with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE

-4-

Attachment 4

INSERT

-4-

-4a-

Attachment 4

(3) Antitrust Conditions

- a. Entergy Louisiana, LLC shall comply with the antitrust conditions in Appendix C, attached hereto, which is hereby incorporated in this renewed license.
- b. EOI shall not market or broker power or energy from River Bend Station, Unit 1. Entergy Louisiana, LLC is responsible and accountable for the actions of its agent, EOI, to the extent said agent's actions affect the marketing or brokering of power or energy from River Bend Station, Unit 1 and, in any way, contravene the antitrust conditions of this paragraph or Appendix C of this renewed license.

(4) DELETED

(5) Mark III Related Issues (Section 6.2.1.9, SER and SSER 2)

- a. EOI shall not use the residual heat removal system in the steam condensing mode without prior written approval of the staff.
- b. DELETED

(6) DELETED

(7) DELETED

(8) DELETED

(9) DELETED

(10) Fire Protection (Section 9.5.1, SER and SSER 3)

EOI shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, and as approved in the SER dated May 1984 and Supplement 3 dated August 1985 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(11) Operating Staff Experience Requirements (Section 13.1.2.1, SSER 2)

EOI shall have a licensed senior operator on each shift, while in Operating Condition 1, 2 and 3, who has had at least six months of hot operating experience on a plant comparable to River Bend Station, including at least six weeks at power levels greater than 20% of full power, and who has had startup and shutdown experience.

(12) DELETED

(13) Partial Feedwater Heating (Section 15.1, SER)

During power operation, the facility shall not be operated with a feedwater heating capacity which would result in a rated thermal power feedwater temperature less than 326 °F.

ATTACHMENT 4

TO NPF-47

DELETED

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 208 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

RIVER BEND STATION, UNIT 1

DOCKET NO. 50-458

1.0 INTRODUCTION

By letter dated November 2, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20307A647), Entergy Operations, Inc. (Entergy, the licensee) submitted a request for changes to Renewed Facility Operating License (RFOL) No. NPF-47 for River Bend Station, Unit 1 (River Bend). The requested changes would revise License Condition 2.C.(10), "Fire Protection (Section 9.5.1, SER [Safety Evaluation Report] and SSER [Supplement to Original SER] 3)," by replacing the current wording with wording from Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," dated April 24, 1986 (ADAMS Accession No. ML031150322), and deleting Attachment 4, "Fire Protection Program Requirements," of the RFOL.

2.0 REGULATORY EVALUATION

2.1 Proposed Changes

The current River Bend fire protection License Condition 2.C(10) and Attachment 4 are not consistent with the standard fire protection license condition and clarifying text discussed in GL 86-10. These inconsistencies have impacted the ability of River Bend to make changes to the approved Fire Protection Program (FPP) that would otherwise be acceptable under the standard fire protection license condition. The licensee proposed to revise its fire protection license condition to be in accordance with the guidance of GL 86-10 as follows.

2.1.1 RFOL No. NPF-47, License Condition 2.C(10):

Current License Condition 2.C(10) states:

EOI [Entergy Operations, Inc.] shall comply with the requirements of the fire protection program as specified in Attachment 4. Attachment 4 is hereby incorporated into this renewed license.

The licensee proposed to replace current License Condition 2.C(10) with the following:

EOI shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility, and as approved in the SER dated May 1984 and Supplement 3 dated August 1985 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

2.1.2 RFOL No. NPF-47, Attachment 4

Current Attachment 4 states:

EOI shall comply with the following requirements of the fire protection program:

1. EOI shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report [FSAR] for the facility through Amendment 22 and as approved in the SER dated May 1984 and Supplement 3 dated August 1985 subject to provisions 2 and 3 below.
2. EOI may make no change to the approved fire protection program which would significantly decrease the level of fire protection in the plant without prior approval of the Commission. To make such a change EOI must submit an application for license amendment pursuant to 10 CFR 50.90.
3. EOI may make changes to features of the approved fire protection program which do not significantly decrease the level of fire protection without prior Commission approval provided (a) such changes do not otherwise involve a change in a license condition or technical specification or result in an unreviewed safety question (see 10 CFR 50.59), and (b) such changes do not result in failure to complete the fire protection program approved by the Commission prior to license issuance. EOI shall maintain, in an auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program, and shall make such records available to NRC [U.S. Nuclear Regulatory Commission or the Commission] inspectors upon request. All changes to the approved program shall be reported to the Director of the Office of Nuclear Reactor Regulation, along with the FSAR revisions required by 10 CFR 50.71(e).

The licensee proposed to delete Attachment 4 in its entirety.

2.2 Regulatory Review

Section 50.48(a) of Title 10 of the *Code of Federal Regulations* (10 CFR) requires that each operating nuclear power plant have a fire protection plan which satisfies General Design Criterion (GDC) 3, "Fire protection," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." GDC 3 states, in part, that "Structures, systems and components important to safety shall be designed and located to minimize. . . the probability and effect of fires and explosions." It further states, in part, that "Firefighting systems shall be designed to assure that their rupture or inadvertent operation does not significantly impair the capability of these structures, systems, and components. . . ." The approved fire protection plan is the plan required to satisfy 10 CFR 50.48(a). Specific fire protection features deemed necessary to ensure this capability are delineated in Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979," to 10 CFR Part 50.

On April 24, 1986, the NRC issued GL 86-10 to request licensees to incorporate the NRC-approved FPP in their FSARs, and encouraged licensees, upon completion of this program, to apply for an amendment to their operating licenses to: (1) replace the current license conditions regarding fire protection with a new standard condition, and (2) remove unnecessary fire protection technical specifications (TSs). On August 2, 1988, the NRC also issued GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications" (ADAMS Accession No. ML031150471), to provide guidance for the preparation of a license amendment request (LAR) to implement GL 86-10. Specifically, the LAR proposed in GL 88-12 would: (1) institute the standard fire protection license condition; (2) remove and relocate the fire protection systems and fire brigade staffing TS; and (3) add administrative controls to support the FPP. The guidance also provided that the LAR should include the update of the FSAR to include the FPP if this has not been previously completed.

The adoption of the standard fire protection license condition allows licensees to make changes to their approved FPP without prior NRC staff approval only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire, and the changes to the FPP are in compliance with the requirements of 10 CFR 50.48(a).

3.0 TECHNICAL EVALUATION

River Bend was licensed to operate on November 20, 1985. NRC regulations at 10 CFR 50.48(b) impose certain requirements on plants licensed to operate prior to January 1, 1979. Specifically, 10 CFR 50.48(b)(2) specifies that all pre-1979 plants must satisfy the applicable requirements of Appendix R to 10 CFR Part 50, including Sections III.G, III.J, and III.O. Except as specified in the license conditions of individual plants, the NRC did not require plants licensed to operate after January 1, 1979, to implement Appendix R. Rather, the NRC staff typically reviewed the FPPs for these plants against the licensing review guidelines in Section 9.5.1, "Fire Protection Program," of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition" (various dates and editions).

The NRC staff evaluated the River Bend FPP in a series of documents: safety evaluation report (SER) dated May 1984 (ADAMS Legacy Library Accession No. 8405230014, non-publicly available), and SSER 3 dated August 1985 (ADAMS Legacy Library Accession No. 8508080308, non-publicly available). The proposed change to License Condition 2.C(10)

would provide a reference to these documents in the license condition, in place of a reference to the documents in an Attachment to the license.

The licensee stated that by letter dated November 30, 1993 (ADAMS Legacy Library Accession Nos. 9312130216 and 9312130231), Gulf States Utilities (i.e., the River Bend licensee prior to Entergy) submitted a LAR to improve the then current River Bend TSs through implementation of the guidance in NUREG-1434, "Standard Technical Specifications, General Electric BWR [Boiling Water Reactor]/6 Plants," Revision 0, dated September 1992 (ADAMS Accession No. ML13196A367). That LAR included the proposed removal and relocation of fire protection TSs to licensee-controlled documents, consistent with GL 86-10 and GL 88-12. In addition to the removal and relocation of the fire protection TSs, that LAR renumbered River Bend TS 6.8.1, "Procedures and Programs," Item g, "Fire Protection Program Implementation," to TS 5.4.1.d, with the same title. The NRC approved the proposed changes in Amendment No. 81 to FOL NPF-47 dated July 20, 1995 (ADAMS Legacy Library Accession Nos. 9508010166, 9508010172, and 9508010174). All the changes specified by GL 86-10 and GL 88-12, except the change regarding use of the standard fire protection license condition were approved by the NRC.

GL 88-12 states, in part, that:

The implementation of Generic Letter 86-10 to remove fire protection TS will entail (1) a revision to the FSAR to incorporate the approved Fire Protection Program, (2) incorporation into the Fire Protection Program of the operational conditions, remedial actions, tests, and fire brigade staffing requirements for fire protection removed from the TS, and (3) a license amendment. The license amendment will (1) institute the standard fire protection license condition, (2) remove the fire protection systems and fire brigade staffing TS, and (3) add administrative controls to support the Fire Protection Program.

The proposed amendment to the River Bend RFOL does not involve any changes to the River Bend FPP, but only involves changes to the wording in the fire protection license condition to correspond with the wording from GL 86-10. As such, no technical evaluation was required or performed, and only a review of the reworded license condition was performed by the NRC staff to ensure strict compliance with the license condition in GL 86-10. In addition, the referenced SER and supplement were verified to ensure the citations are accurate in the reworded standard license condition.

On the basis of its review of the information provided in the LAR, the NRC staff finds the licensee's proposed change to incorporate the standard fire protection license condition to be consistent with GL 86-10 is acceptable, because the licensee has followed the guidance of GL 88-12 and (1) revised the FSAR to incorporate the approved FPP; (2) incorporated into its FPP the operational conditions, remedial actions, tests, and fire brigade staffing requirements for fire protection previously removed from the TS; (3) removed the fire protection systems and fire brigade staffing TS; (4) added administrative controls to support the FPP; and (5) submitted a LAR to adopt the standard fire protection license condition from GL 86-10.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Louisiana State official was notified of the proposed issuance of the amendment on June 10, 2021. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The NRC has previously issued a proposed finding that the amendment involves no significant hazards consideration, published in the *Federal Register* on January 26, 2021 (86 FR 7115), and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Thinh Dinh, NRR

Date: July 2, 2021

SUBJECT: RIVER BEND STATION, UNIT 1 - ISSUANCE OF AMENDMENT NO. 208
TO ADOPT GENERIC LETTER 86-10 STANDARD LICENSE CONDITION FOR
FIRE PROTECTION (EPID L-2020-LLA-0246) DATED JULY 2, 2021

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DATE	7/2/2021	7/2/2021		

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