

The proposed change does not involve any physical alteration of plant equipment and does not change the method by which any safety-related system performs its function. The TS currently allow[s] containment and drywell isolation valves to be open under administrative controls after being closed to comply with TS ACTIONS for inoperable valves. Extending this allowance to the supporting instrumentation does not introduce any new method of isolation that has not already been evaluated.

Allowing the RCIC turbine steam line low pressure isolation instrumentation to be inoperable during low startup operating pressures does not create the possibility of any new failure modes other than those previously evaluated. No new or different type of equipment will be installed. There are no new failure mechanisms or accident initiators introduced. The low pressure isolation is designed to terminate RCIC turbine operation at low steam pressures for equipment protection. However, this function is not required since the RCIC system is not required to be operable and the same function is accomplished by maintaining the turbine trip/throttle valve closed. The low pressure isolation function will continue to be required when the RCIC system is required to be operable.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

*Response:* No.

The change to allow containment and drywell isolation valves to be unisolated under administrative control does not reduce any margins to safety since the proposed allowance for the supporting isolation instrumentation is no less restrictive than the allowance for the equipment it supports. When the valves are unisolated, the design basis function of containment isolation is maintained by administrative controls.

The change to allow the RCIC turbine steam line low pressure isolation instrumentation to be inoperable during low startup operating pressures does not reduce any margins to safety. The current bounding analysis for a steam line break outside of containment remains bounding for a[n] RCIC steam break at lower pressures. In addition, the current high energy line break evaluations and subcompartment pressurization evaluations remain bounding for the low pressure condition. The design basis functions of containment isolation and containment integrity are maintained by the diverse leak detection instruments as well as other barriers or isolation capabilities that provide the isolation function.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*NRC Section Chief:* Robert A. Gramm.

*Entergy Operations, Inc., System Energy Resources, Inc., South Mississippi Electric Power Association, and Entergy Mississippi, Inc., Docket No. 50-416, Grand Gulf Nuclear Station, Unit 1, Claiborne County, Mississippi*

*Date of amendment request:* May 12, 2003.

*Description of amendment request:* The proposed amendment would change the Technical Specifications (TS) to remove the MODE restrictions for performance of Surveillance Requirement (SR) 3.8.4.7 and SR 3.8.4.8 for the Division 3 direct current electrical power subsystem.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

*Response:* No.

The power supplied by the battery is used only as a source of control and motive power for the HPCS [High Pressure Core Spray] system logic, HPCS diesel-generator set control and protection, and other Division 3 related controls. The loads supplied by this system are only loads associated with Division 3 of the Emergency Core Cooling Systems (ECCS).

The battery testing period is within the period of time that the system is scheduled to be out of service for other planned maintenance. The battery test does not increase unavailability of the supported system or represent any change in risk above the current practice of planned system maintenance outages as currently allowed by the TS. Any risk associated with the testing of the Division 3 batteries will be enveloped by the risk management of the system outage.

The out of service condition is controlled and evaluated for safety implications in accordance with 10 CFR 50.65. The HPCS system reliability and availability are monitored and evaluated in relationship to Maintenance Rule goals to ensure that total outage times do not degrade operational safety over time.

Therefore, the proposed change will have no effect on the probability or consequences of any previously evaluated accident.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

*Response:* No.

This request involves the testing of the HPCS battery on-line while the system is already out of service. The testing will not

add additional out of service time. Testing during this period has no influence on, nor does it contribute in any way to, the possibility of a new or different kind of accident or malfunction from those previously analyzed. The method of performing the test is not changed. No new accident modes are created by testing during the period when the system is already unavailable. Because the system is already out of service, no safety-related equipment or safety functions are altered as a result of this change.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

*Response:* No.

The battery testing will be performed when the HPCS system is already out of service for maintenance. The out of service condition is controlled and evaluated for safety implications in accordance with 10 CFR 50.65. The batteries are not expected to be unavailable for more than 24 hours. This testing period is within the period of time that the system is scheduled to be out of service for other planned maintenance. Therefore, the battery test does not increase unavailability of the supported system or represent any change in risk above the current practice of planned system maintenance outages as currently allowed by the TS. Timing of this test has no effect on any fission product barrier.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*Entergy Operations, Inc., System Energy Resources, Inc., South Mississippi Electric Power Association, and Entergy Mississippi, Inc., Docket No. 50-416, Grand Gulf Nuclear Station, Unit 1, Claiborne County, Mississippi*

*Date of amendment request:* May 12, 2003.

*Description of amendment request:* The proposed amendment would change the Technical Specification (TS) 3.3.6.1, "Primary Containment and Drywell Isolation Instrumentation," to add a provision to the APPLICABILITY requirement specified in Table 3.3.6.1-1, to eliminate the requirement that the instrumentation for the Residual Heat Removal (RHR) System Isolation