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U.S. Nuclear Regulatory Commission
Mail Stop P1-37
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Attention: Document Control Desk

SUBJECT: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
GGNS - Fidelity of UFSAR

GNRO-99/00097

Gentlemen:

This letter provides an update of the GGNS effort for the review of the UFSAR. The information is provided in the following format: 1) Background, 2) Review Scope, 3) Review status/Results, 4) Additional Review Plan, and 5) Conclusion.

1) **Background:**

The fidelity of the UFSAR is a vital aspect of our responsibility to ensure the safe operation of GGNS and regulatory compliance. In the past years, there have been various assessments of the UFSAR. These assessments have included Safety System Functional Inspections (SSFIs), Safety System Functional Assessments (SSFAs), NRC Inspections, and Self Assessments. Also, there have been a number of activities to improve the fidelity of the UFSAR. The focus has been on maintenance and revision of the UFSAR to reflect changes and to correct discrepancies.

Prompted by the renewed focus on the design and licensing bases, FSAR assessments were conducted at each Entergy Operations facility in mid-1996. We shared the results of these assessments with you in meetings at NRR (November 14, 1996) and Region IV (December 17, 1996). The assessment concluded that a complete overhaul of the GGNS UFSAR was not necessary. GGNS 50.54(f) response reflected the findings of the corporate assessment. These past reviews and inspections associated with the UFSAR provide a high degree of confidence that the discrepancies found do not materially affect the ability of safety systems to perform their design functions.

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2) Review Scope:

As part of the GGNS response to the NRC 10CFR50.54 (f) letter, GGNS made a commitment to review selected systems/sections of the UFSAR for consistency with the supporting engineering documents. Also, commitment was made to review selected operations and maintenance procedures to ensure that the procedures are consistent with design basis information. Sixteen representative systems were selected for consistency review. The review consisted of review of all applicable sections of the UFSAR and the associated operations and maintenance procedures as well as other licensing documents related to each of the selected 16 systems. Eight additional systems were reviewed for consistency with the supporting engineering documents.

In addition to the System Reviews, line by line statement of fact reviews were performed for UFSAR section 7.3 (ESF systems) and 7.4 (Systems required for safe shutdown). Reviews of UFSAR compliance with six Regulatory Guides were also performed.

Although not part of the 50.54 (f) review effort, extensive reviews of other sections of the UFSAR have been conducted since 1984.

- Sections 4.2 through 4.4 (Fuel, Nuclear, Thermal/Hydraulic Design)
- Section 5.3 (Reactor Vessel)

Also, line by line review of the following chapters/sections have been conducted:

- Section 6.3 Emergency Core Cooling Status
- Chapter 11, Radioactive Waste Management
- Chapter 3, Conduct of Operations
- Chapter 15, Accident Analysis.

3) Review Status/Results:

As we had committed in 1997, a review of all applicable sections of the UFSAR and associated operations and maintenance procedures as well as other licensing documents related to each of the selected 16 systems have been completed. Line by line statement of fact reviews for UFSAR Section 7.3 (ESF Systems) and 7.4 (Systems required for Safe Shutdown) and review of UFSAR compliance with 6 Regulatory Guides have also been completed. The results of the reviews have not revealed any recurring failures to meet the requirements of 50.71 (e) that would indicate current programmatic failures. Even though reviews identified about 660 discrepancies related to the UFSAR, only five of these discrepancies were determined to meet the criteria for Condition Reports. Many of the discrepancies or ambiguities identified were early problems associated with original writing or revision of the UFSAR. We shared the results of these reviews with you in a meeting at Region IV on October 18, 1999.

4) Additional Review Plan:

During our reviews, we have identified more discrepancies than we expected. Although the discrepancies are minor/insignificant, they do not meet our expectations for overall UFSAR fidelity. As a result of this, GGNS has decided to perform reviews of additional sections of Chapter 3, 7, 8 and 9. Review of UFSAR compliance with six additional Regulatory Guides have also been planned. GGNS further plans to improve UFSAR ownership across site departments by development of a fidelity document which incorporates guidance from NEI 98-03 and assigns UFSAR information owners. Also, GGNS intends to simplify portions of the UFSAR by applying NEI 98-03 criteria.

5) Conclusion:

The fidelity of the UFSAR is vital for the continued safe operation of GGNS, regulatory compliance, and the economic viability of GGNS. Various assessments/inspections over the past years have confirmed the overall integrity of the UFSAR. GGNS UFSAR history provides a high degree of confidence that the UFSAR adequately reflects GGNS configuration. Even though a recently conducted NRC inspection (SSEI) identified various discrepancies related to UFSAR fidelity, the report concluded that none of the discrepancies represented an operability concern. Reviews of additional sections of Chapter 3, 7, 8, 9, and review of six additional Regulatory Guides will be completed by December 31, 2000.

Yours truly,



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