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Michael A. Krupa
Director
Nuclear Safety & Licensing

March 22, 2000

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Stop OP1-17
Washington, DC 20555-0001

Subject: Entergy Operations, Inc.
Concurrence with Siemens Power Corporation Request for Approval of SER
Conditions for EMF-CC-074(P), Volume 4, Revision 0

Reference: 1. NRC:00:018, Letter, James F. Mallay (SPC) to Document Control Desk
(NRC), "Request for Approval of SER Conditions for EMF-CC-074(P)
Volume 4 Revision 0, "BWR Stability Analysis: Assessment of STAIF with
Input from MICROBURN-B2", dated March 9, 2000

CNRO-2000-00007

Gentlemen:

On November 24, 1999, Siemens Power Corporation (SPC) submitted to the NRC for review and approval Topical Report No. EMF-CC-074(P), Vol. 4, Rev. 0 assessing the use of MICROBURN-B2 as input to BWR stability analysis code STAIF. SPC met with the NRC staff on March 2, 2000 to discuss this topical report. Entergy Operations, Inc. (EOI) also attended the meeting. At the meeting SPC discussed the proposed Enhanced Option 1-A (E1A) STAIF validation success criteria using reduced methodology uncertainty and expressed their desire for the NRC to approve the E1A validation criteria. On March 9, 2000, SPC submitted a formal follow-up request by Reference 1.

While the existing E1A stability regions provide margin for plant startup and operating maneuvers, even limited expansion of those regions reduces operating flexibility. Application of the proposed STAIF criteria limits the expansion of those regions while allowing the operators to perform safe reactor maneuvers.

SPC justifies the requested criteria based on improved computer modeling, better characterization of the modes of oscillation during instability, and validation by use of an expanded database for benchmarking STAIF.

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Entergy is interested in retaining the most operating flexibility practical while maintaining stability regions large enough to preclude instability events. By reducing the methodology uncertainty, the proposed criteria reduce loss of operating margin while preserving the defense-in-depth inherent in the current E1A solution.

EOI supports the SPC proposed stability validation criteria and requests the staff consider a timely review of this report in order to support the next Grand Gulf refueling outage currently scheduled for April, 2001.

Should you have any questions regarding this submittal, please contact Adrienne Smith at (601) 368-5275.

Very truly yours,



MAK/ABS/baa

cc: Mr. R. K. Edington (RBS)
Mr. W. A. Eaton (GGNS)
Mr. G. J. Taylor (ECH)

Ms. J. L. Dixon-Herrity, NRC Senior Resident Inspector (GGNS)
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Mr. E. W. Merschoff, NRC Region IV Regional Administrator
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