



Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775
Tel 225-381-4374

Timothy Schenk
Regulatory Assurance Manager

RBG-47886

July 24, 2018

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Supplement to Application for Technical Specification Change
Regarding Risk-Informed Justification for the Relocation of Specific
Surveillance Frequency Requirements to a Licensee Controlled
Program (TSTF-425)
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

RBF1-18-0146

Dear Sir or Madam:

In accordance with the provisions of Title 10 of the Code of Federal Regulations (10 CFR 50.90), "Application for amendment of license, construction permit, or early site permit," Entergy Operations, Inc. (Entergy) previously submitted a request for an amendment to the Technical Specifications (TS) for River Bend Station, Unit 1 (RBS).

The proposed amendment would modify the RBS TS by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specification Initiative 5B, Risk-Informed Method for Control of Surveillance Frequencies."

Entergy originally submitted this request by RBS letter RBG-47799 dated February 28, 2018. [ADAMS Accession Number ML18067A115]

It has recently been discovered that the supplement to the proposed amendment, submitted by RBS letter RBG-47882 dated July 10, 2018 [ADAMS Accession Number ML18191B010], contains errors and should be disregarded. The Attachments of this letter should be used instead.

Attachment 1 contains the five current RBS TS pages with the proposed changes (mark-up). Attachment 2 contains the revised TS pages. The five pages contained in this supplement should supersede the corresponding pages of the original amendment and RBS letter RBG-47882.

The supplemental information provided does not change the scope of the original submittal.

Entergy requests approval the proposed license amendment by February 28, 2019 with the amendment being implemented within 90 days.

There are no regulatory commitments contained in this submittal. If you have any questions, please contact Mr. Tim Schenk at 225-381-4177.

Sincerely,



TAS/twf

ATTACHMENT:

1. Proposed Technical Specification Changes (Mark-up)
2. Revised Technical Specification Pages

cc:

U.S. Nuclear Regulatory Commission
Attn: Ms. Lisa M. Regner, Project Manager
09-D-14
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

U.S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Blvd.
Arlington, TX 76011-4511

NRC Senior Resident Inspector
Attn: Mr. Jeff Sowa
5485 U.S. Highway 61, Suite 1
St. Francisville, LA 70775

Public Utility Commission of Texas
Attn: PUC Filing Clerk
1701 N. Congress Avenue
P. O. Box 13326
Austin, TX 78711-3326

**ATTACHMENT 1
RBG-47886**

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.7.5	Verify the available weight of Boron-10 is ≥ 170 lbs, and the percent weight concentration of sodium pentaborate in solution is $\leq 9.5\%$ by weight, and determine the minimum required available solution volume.	31 days ← <u>AND</u> Once within 24 hours after water or boron is added to solution <u>AND</u> Once within 24 hours after solution temperature is restored to $\geq 45^{\circ}\text{F}$
SR 3.1.7.6	Verify each SLC subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position, or can be aligned to the correct position.	31 days ←
SR 3.1.7.7	Verify each pump develops a flow rate ≥ 41.2 gpm at a discharge pressure ≥ 1250 psig.	In accordance with the Inservice Testing Program
SR 3.1.7.8	Verify flow through one SLC subsystem from pump into reactor pressure vessel.	24 months on a ← STAGGERED TEST BASIS

(continued)

In accordance with the Surveillance frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes.	31 days ←
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	24 months ←
SR 3.6.4.3.4	Verify each SGT filter cooling bypass damper can be opened and the fan started.	24 months ←

In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.7.1	Verify one fuel building ventilation charcoal filtration subsystem in operation.	12 hours ←
SR 3.6.4.7.2	Operate each fuel building ventilation charcoal filtration subsystem for ≥ 15 continuous minutes.	31 days ←
SR 3.6.4.7.3	Perform fuel building ventilation charcoal filtration filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.7.4	Verify each fuel building ventilation charcoal filtration subsystem actuates on an actual or simulated initiation signal.	24 months ←
SR 3.6.4.7.5	Verify each fuel building ventilation charcoal filtration filter cooling bypass damper can be opened and the fan started.	24 months ←

In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CRFA subsystems inoperable during movement of recently irradiated fuel assemblies in the primary containment or fuel building, or during OPDRVs.</p> <p><u>OR</u></p> <p>One or more CRFA subsystems inoperable due to inoperable CRE boundary during movement of recently irradiated fuel assemblies in the primary containment or fuel building, or during OPDRVs.</p>	<p>F.1 Suspend movement of recently irradiated fuel assemblies in the primary containment and fuel building.</p> <p><u>AND</u></p>	Immediately
	<p>F.2 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.2.1 Operate each CRFA subsystem for ≥ 15 continuous minutes.</p>	31 days ←
<p>SR 3.7.2.2 Perform required CRFA filter testing in accordance with the Ventilation Filter Testing Program (VFTP).</p>	In accordance with the VFTP
<p>SR 3.7.2.3 Verify each CRFA subsystem actuates on an actual or simulated initiation signal.</p>	24 months ←

(continued)

In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.4.1	Verify battery terminal voltage is ≥ 130.2 V on float charge.	7 days ←
SR 3.8.4.2	<p>Verify no visible corrosion at battery terminals and connectors.</p> <p><u>OR</u></p> <p>Verify battery connection resistance is $\leq 1.5 \text{ E-4 ohm}$ for inter-cell connections, $\leq 1.5 \text{ E-4 ohm}$ for inter-rack connections, $\leq 1.5 \text{ E-4 ohm}$ for inter-tier connections, and $\leq 1.5 \text{ E-4 ohm}$ for terminal connections.</p> <p><u>AND</u></p> <p>Verify the total resistance for battery inter-cell, inter-rack, inter-tier, and terminal connections combined is $\leq 27.45 \text{ E-4 ohms}$.</p>	<p>92 days ←</p> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>In accordance with the Surveillance Frequency Control Program</p> </div>
SR 3.8.4.3	Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration.	24 months ←
SR 3.8.4.4	Remove visible corrosion, and verify battery cell to cell and terminal connections are coated with anti-corrosion material.	24 months ←
SR 3.8.4.5	<p>Verify battery connection resistance is $\leq 1.5 \text{ E-4 ohm}$ for inter-cell connections, $\leq 1.5 \text{ E-4 ohm}$ for inter-rack connections, $\leq 1.5 \text{ E-4 ohm}$ for inter-tier connections, and $\leq 1.5 \text{ E-4 ohm}$ for terminal connections.</p> <p><u>AND</u></p> <p>Verify the total resistance for battery inter-cell, inter-rack, inter-tier, and terminal connections combined is $\leq 27.45 \text{ E-4 ohms}$.</p>	24 months ←

**ATTACHMENT 2
RBG-47886**

REVISED TECHNICAL SPECIFICATION PAGES

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.7.5	Verify the available weight of Boron-10 is ≥ 170 lbs, and the percent weight concentration of sodium pentaborate in solution is $\leq 9.5\%$ by weight, and determine the minimum required available solution volume.	In accordance with the Surveillance Frequency Control Program <u>AND</u> Once within 24 hours after water or boron is added to solution <u>AND</u> Once within 24 hours after solution temperature is restored to $\geq 45^{\circ}\text{F}$
SR 3.1.7.6	Verify each SLC subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position, or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.1.7.7	Verify each pump develops a flow rate ≥ 41.2 gpm at a discharge pressure ≥ 1250 psig.	In accordance with the Inservice Testing Program
SR 3.1.7.8	Verify flow through one SLC subsystem from pump into reactor pressure vessel.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes.	In accordance with the Surveillance frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance frequency Control Program
SR 3.6.4.3.4	Verify each SGT filter cooling bypass damper can be opened and the fan started.	In accordance with the Surveillance frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.7.1	Verify one fuel building ventilation charcoal filtration subsystem in operation.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.7.2	Operate each fuel building ventilation charcoal filtration subsystem for ≥ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.7.3	Perform fuel building ventilation charcoal filtration filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.7.4	Verify each fuel building ventilation charcoal filtration subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.7.5	Verify each fuel building ventilation charcoal filtration filter cooling bypass damper can be opened and the fan started.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CRFA subsystems inoperable during movement of recently irradiated fuel assemblies in the primary containment or fuel building, or during OPDRVs.</p> <p><u>OR</u></p> <p>One or more CRFA subsystems inoperable due to inoperable CRE boundary during movement of recently irradiated fuel assemblies in the primary containment or fuel building, or during OPDRVs.</p>	<p>F.1 Suspend movement of recently irradiated fuel assemblies in the primary containment and fuel building.</p> <p><u>AND</u></p>	Immediately
	<p>F.2 Initiate action to suspend OPDRVs.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.2.1 Operate each CRFA subsystem for ≥ 15 continuous minutes.</p>	In accordance with the Surveillance Frequency Control Program
<p>SR 3.7.2.2 Perform required CRFA filter testing in accordance with the Ventilation Filter Testing Program (VFTP).</p>	In accordance with the VFTP
<p>SR 3.7.2.3 Verify each CRFA subsystem actuates on an actual or simulated initiation signal.</p>	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.4.1	Verify battery terminal voltage is ≥ 130.2 V on float charge.	In accordance with the Surveillance Frequency Control Program
SR 3.8.4.2	<p>Verify no visible corrosion at battery terminals and connectors.</p> <p><u>OR</u></p> <p>Verify battery connection resistance is $\leq 1.5 \text{ E-4}$ ohm for inter-cell connections, $\leq 1.5 \text{ E-4}$ ohm for inter-rack connections, $\leq 1.5 \text{ E-4}$ ohm for inter-tier connections, and $\leq 1.5 \text{ E-4}$ ohm for terminal connections.</p> <p><u>AND</u></p> <p>Verify the total resistance for battery inter-cell, inter-rack, inter-tier, and terminal connections combined is $\leq 27.45 \text{ E-4}$ ohms.</p>	In accordance with the Surveillance Frequency Control Program
SR 3.8.4.3	Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration.	In accordance with the Surveillance Frequency Control Program
SR 3.8.4.4	Remove visible corrosion, and verify battery cell to cell and terminal connections are coated with anti-corrosion material.	In accordance with the Surveillance Frequency Control Program
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