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RGB-47910

October 18, 2018

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

Subject: Entergy Comments on the River Bend Station (RBS), Unit 1, License Renewal
Safety Evaluation Report (SER) dated July 2018
Docket No. 50-458
License No. NPF-47

Dear Sir or Madam:

Enclosure 1 contains comments from Entergy Operations, Inc. (Entergy) regarding the Safety Evaluation Report for License Renewal of River Bend Station, Unit 1 dated July 2018.

There are no regulatory commitments in this submittal.

If you require additional information, please contact Mr. Tim Schenk at (225)-381-4177 or tschenk@entergy.com.

In accordance with 10 CFR 50.91 (b)(1), Entergy is notifying the State of Louisiana and the State of Texas by transmitting a copy of this letter to the designated State Official.

Sincerely,

A handwritten signature in black ink that reads "WFM Maguire". The signature is written in a cursive style with a large, looping flourish at the end.

WFM/djp

Enclosure 1: Entergy Comments on the RBS License Renewal Safety Evaluation Report (SER)

cc: U. S. Nuclear Regulatory Commission
Attn: Emmanuel Sayoc
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U. S. Nuclear Regulatory Commission
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U. S. Nuclear Regulatory Commission
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RBF1 -18-193

RBG-47910

Enclosure 1

Entergy Comments on the RBS License Renewal
Safety Evaluation Report (SER)

**RBS LICENSE RENEWAL
SAFETY EVALUATION REPORT (SER) REVIEW**

Comment and Resolution Form

License Renewal SER: RBS

SER Section: Various

SER Section Reviewer: Entergy

Date: 10/10/18

Comment No.	Section/Pg.#	Comment	Resolution
1.	2.1.3.1.1 / 2-3	In the bullet list at the top of the page, "structural design requirement documents" should be "system/ structural design requirement documents" (see LRA page 2.1-2, last paragraph)	
2.	2.1.4.1.1 / 2-5	The next-to-last line on page 2-5, in the quoted material, is missing a paragraph break: "... 10 CFR 54.4(a)(1). <i>[paragraph break here]</i> As described in Section 2.1.1 [of the LRA], plant electrical and"	
3.	2.1.4.2.1 / 2-9	The two paragraphs of quotation from the LRA are not as stated in the RBS LRA. Compare to LRA page 2.1-14, the two paragraphs under the heading, <i>Pipe Whip, Jet Impingement, or Harsh Environments</i> . The 1 st paragraph is shorter, and the 2 nd paragraph has a different structure for the last sentence. An ellipsis should be used to denote the omission of the first two sentences in the 2 nd paragraph.	
4.	2.1.4.2.2 / 2-9	2 nd paragraph in 2.1.4.2.2 refers to LRA Section 1.5, "Application Structure." For the RBS LRA, this should refer to LRA Section 2.1.1.2, "Application of Criterion for Nonsafety-Related SSCs Whose Failure Could Prevent the Accomplishment of Safety Functions," which states that the guidance of NEI 95-10 Appendix F is used.	

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5.	2.1.4.2.2 / 2-10	<p>Last paragraph on page 2-10 refers to a "space" in the LRA: "The spaces approach focused on the interaction between nonsafety-related and safety-related SSCs that are located in the same space, which was described in the LRA as a structure or a portion of a structure that contains active or passive safety-related SSCs."</p> <p>This is different from the definition of a "space" in LRA Section 2.1.1.2.2 on LRA page 2.1-6: "A 'space' is defined as a room or cubicle that is separated from other spaces by substantial objects (such as wall, floors, and ceilings). The space is defined such that potential interaction between nonsafety-related and safety-related SSCs is limited to the space."</p>	
6.	2.1.4.2.2 / 2-10	<p>Sentence beginning at the bottom of page 2-10 reads, "Additionally, Entergy identified nonsafety-related mitigating features, such as pipe conduits or separation by a surface providing spray and drip shielding, which protected safety-related SSCs from the failure of nonsafety-related SSCs." This is not stated the same way in the LRA.</p> <p>The RBS LRA describes mitigating features in Section 2.1.2.2.3, under structural intended functions: "Mitigating features include missile barriers, flood barriers, HELB protection, and nonsafety-related supports for non-seismic (including seismic II/I) piping systems and electrical conduit and cable trays with potential for spatial interaction with safety-related equipment."</p> <p>These mitigating features are included as structural components with an intended function for license renewal.</p>	

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7.	2.1.4.3.2 / 2-12	The paragraph about method for (a)(3) scoping refers to a technical basis document: "The staff reviewed Entergy's implementing procedures and technical basis document that describe its method for identifying SSCs within the scope of license renewal in accordance with 10 CFR 54.4(a)(3)." Entergy does not prepare topical reports or technical bases documents for methods of scoping for (a)(3) events. The method is contained in the implementing procedure and includes the review of site-specific documents relating to the applicable events.	
8.	2.1.4.4.2 / 2-13, 2-14	Last paragraph on 2-14 has, "(3) document the activities in scoping results reports." Since only one scoping report is produced, this should read, "(3) document the activities in a scoping results <i>report</i> ." Similarly, at the top of page 2-14, the statement should read, "The <i>report</i> included a description of the structure or system...." At the bottom of page 2-14, the statement should read, "On a sampling basis, the NRC staff reviewed Entergy's scoping <i>report</i>"	
9.	2.2.2 and 2.2.3 / 2-18	The first paragraph of Section 2.2.2 has an incorrect table number. This should read, "In LRA Table 2.2-4, Entergy lists the structures that are within the scope of license renewal." Section 2.2.3 should also refer to LRA Tables 2.2-1, 2.2-3 and 2.2-4 in two places.	

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10.	2.2.3 / 2-19	The last paragraph of Section 2.2.3 should refer to LRA Tables 2.2- <u>2</u> and 2.2- <u>5</u> for systems and structures that are not within the scope of LR. In reviewing for omissions, seems the focus should be on the systems and structures that are listed as NOT in scope.	
11.	2.3.3.7.2 / 2-41	At the top of page it states "The staff confirmed that floor drains for the removal of fire water in question were correctly excluded from the scope of license renewal and are not subject to an aging management review because they are credited in the RBS fire hazard analysis...". Need to add the word "not" between "are" and "credited."	
12.	3.0.3 / 3-7	Minor typo- table number in first sentence should be Table 3.0-1 to match table heading.	
13.	3.0.3.1.7 / 3-25	Minor typo-In second paragraph "theses brackets" should be "these brackets."	
14.	3.0.3.1.13 / 3-34	Minor typo- Conclusion paragraph has heading format and section number of the next section.	

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15.	3.0.3.1.14 / 3-34	In the first paragraph of this section, the following statement is included related to LRA Section B.1.13, One-Time Inspection – Small-Bore Piping, “ <i>Entergy amended this LRA section by letter dated February 6, 2018.</i> ” Entergy did not amend this section in the letter dated February 6, 2018. Entergy provided the Class 1 small-bore butt weld and socket weld population and sample size, but did not amend LRA Section B.1.33. In addition, the SER discussion is associated with Parameters Monitored/Inspected, which does not address numbers of welds to sample. That discussion is in “Detection of Aging Effects.”	
16.	3.0.3.1.14 / 3-36	Minor typo-suggest remove “ongoing” in “ongoing implementation.” Because it is a one-time program, it will not be ongoing during the period of extended operation.	
17.	3.0.3.2.3 / 3-59	Minor typo near the end of the last paragraph - RAI B.1.10-3J should just be RAI B.1.10-3.	
18.	3.0.3.2.5 / 3-68	In the discussion of the Updated Safety Analysis Report Supplement of the Diesel Fuel Monitoring Program, the following statement is included in the middle of the first paragraph, “ <i>To gain more information, staff issued a request for additional information, RAI B.1.15-1, on December 13, 2017 (see ADAMS Accession No.</i> ” The accession number is missing. Also the discussion of proprietary determination within parentheses seems incorrect in that it refers to later correspondence.	

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19.	3.0.3.2.6 / 3-70	The first sentence of the Staff evaluation of Enhancement 2 states, " <i>LRA Section B.1.17 includes an enhancement to Program Element 4 (detection of aging effects) to revise procedures to specify inspections for in-scope insulated <u>components in a condensation of air-outdoor environments</u></i> " [underline added]. The underlined text should be "components in a condensation or air-outdoor environment."	
20.	3.0.3.2.7 / 3-71	Minor typo-B1.18 should be B.1.18 in first sentence of 3.0.3.2.7.	
21.	3.0.3.2.8 / 3-80	The first sentence of the Staff evaluation of Enhancement 11 states, " <i>LRA Section B.1.20 includes an enhancement to Program Element 4 (detection of aging effects) to <u>revise procedures of performing main drain tests</u></i> " [underline added]. Consider changing to "revise procedures <u>for</u> performing main drain tests."	

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22.	3.0.3.2.19 / 3-113	<p><i>Enhancement 12. States:</i> ‘LRA Section B.1.41, as amended by letter dated March 22, 2018, includes an enhancement to Program Element 2 (preventive actions) related to the procurement of bolting greater than 1 inch in diameter. The staff reviewed this enhancement against the corresponding program element in GALL Report AMP XI.S6 and finds it acceptable as follows: <u>When implemented, it will prevent the procurement of high-strength structural bolts in sizes greater than 1 inch in diameter (because such bolts may be susceptible to stress corrosion cracking).</u>’</p> <p>This statement needs further clarification provided to include “with actual yield strength >150” what is stated seems to imply that all high strength bolts > 1 inch will not be procured, which is not the case.</p>	
23.	3.0.3.3.1 / 3-115	<p>The first paragraph in Section 3.0.3.3.1 states, “<i>LRA Section B.1.34 describes the existing Periodic Surveillance and Preventive Maintenance program as a plant-specific AMP with enhancements. Entergy amended this LRA section by letters dated <u>December 12, 2017, May 10, 2018, and May 16, 2018 (see ADAMS Accession Nos. ML17347B473, ML18130A935, and ML18138A144, respectively)</u>” [underline added]. An additional letter dated May 29, 2018, submitted by Entergy, also amended LRA Section B.1.34.</i></p>	

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24.	3.0.3.3.1 / 3-117	The first paragraph of the Detection of Aging Effects discussion includes the following statement, " <i>RAI B.1.34-2, dated November 16, 2018, and Entergy's response, dated <u>December 16, 2017</u>, are documented in ADAMS Accession Nos. ML17320B099 and ML17347B473, respectively</i> " [underline added]. The underlined date should be December 12, 2017.	

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25.	3.0.3.3.1 / 3-117	<p>The second paragraph of the Detection of Aging Effects discussion begins with the following: <i>“As part of its response to <u>RAI B.1.34-2</u>, Entergy revised <u>(a)</u> LRA Table 3.5.1, Item 3.5.1-26 to state that the periodic surveillance and preventive maintenance program is used to manage “cracking and change in material properties to prevent loss of sealing for elastomeric commodities,” <u>(b)</u> LRA Section B.1.34 to require that 10 percent of the surface area of elastomeric components be manipulated during examination and to specify that cracking is an applicable aging effect for elastomeric materials, <u>(c)</u> LRA Section A.1.34 and Section B.1.34 so that the periodicity, sample size, and inspection location criteria cited in in these sections is consistent with GALL Report AMP XI.M38, “Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components,” (a GALL Report equivalent program), and <u>(d)</u> LRA Section A.1.34 and LRA Section B.1.34 to require manipulation of elastomers during visual inspections” [underline added].</i> Items “(a)” and “(b)” were introduced by the response to RAI B.1.34-2; however, items “(c)” and “(d)” were introduced in the response to RAI B.1.34-3 in the same letter dated December 12, 2017. Suggest including RAI B.1.34-3 in the introductory phrase, “As part of its response to RAI B.1.34-2 <u>and RAI B.1.34-3</u>, Entergy revised...”</p>	

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26.	3.0.3.3.1 / 3-119	The first paragraph of the Updated Safety Analysis Report Supplement discussion states in the last sentence, "RAI B.1.34-3, dated November 16, 2017, and the Entergy's response, dated <u>December 16, 2017</u> , are documented in ADAMS Accession Nos. ML17320B099 and ML17347B473" [underline added]. The underlined date should be December 12, 2017 and "the Entergy's response" should be "the Entergy response."	
27.	3.0.3.3.1 / 3-120	The last paragraph of the Updated Safety Analysis Report Supplement discussion states, "The staff finds that the information in the USAR supplement, as amended by letters dated December 12, 2017; May 10, 2018; and May 16, 2018, is an adequate summary description of the program. An additional letter dated May 29, 2018, submitted by Entergy, also emended LRA Section B.1.34.	
28.	Table 3.1-1 / 3-129	Items 3.1.1-17 and 3.1.1-21 are for the isolation condenser and are identified as consistent. These should be <i>not applicable to RBS</i> .	
29.	3.1.2.1.1 / 3-133	Minor typos- "Item IV. B1.R-94" in third paragraph has an extra space In the fourth paragraph, "inthe" needs a space.	
30.	3.1.2.1.1 / 3-134	Minor typo- beginning quote mark for 98-0030 is incorrect symbol. Minor typo in last Section 3.1.2.1.1 paragraph - missing period.	
31.	3.1.2.1.2 / 3-136	Is highlighting in footnote 1 going to be removed?	

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32.	3.1.2.1.5 / 3-137	Minor typo-The date listed for the response to RAI 3.1.2.1.2-2 is March 6. This should be March 26.	
33.	3.1.2.1.6 / 3-138	Minor typo- "are not applicable" is repeated and "which" should be "that." Sentence should read, "Based on its review, the staff concludes that the aging management review items that Entergy claims are not applicable to RBS, are not applicable to RBS."	
34.	3.1.2.2.2 / 3-139	Minor typo- Item 2 in the SER states it is also for "various portions" (same as Item 1). Item 2 description in the LRA is for "shell assemblies".	
35.	3.1.2.3.2 / 3-145	Minor typo- the first sentence on the page should identify the BWR Vessel Internals program also (like the second paragraph).	
36.	3.1.2.3.3 / 3-145	Is green font on bottom of page going to be changed?	
37.	3.1.2.3.3 / 3-145	The paragraph at the bottom of page 145 that is describing carbon steel and note H is incorrect. The stainless steel row in LRA Table 3.1.2-3 identified note H. (if you are including stainless steel, the section heading needs to also change and cracking was also identified in LRA Table 3.1.2-3.) The second paragraph on page 146 is correct for the carbon steel row.	

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38.	3.2.2.3.2 / 3-157	The first paragraph states in part, "To address this question, the staff issued a request for additional information (RAI 3.2.2.3.2-1). The staff's request, dated November 29, 2017, is documented in ADAMS Accession No. ML17335A098. Entergy responded on <u>December 29, 2017</u> (see ADAMS Accession No. ML18010A848)," [underline added]. Entergy's response to RAI 3.2.2.3.2-1 is dated January 10, 2018.	
39.	3.2.2.3.2 / 3-157	The last sentence of the first paragraph states, "Subsequently, Entergy submitted its final response on <u>May 10, 2018</u> (see ADAMS Accession No. ML18138A144)," [underline added]. Entergy submitted its final response on May 16, 2018.	
40.	3.2.2.3.2 / 3-158	The second sentence of the second paragraph states in part, "As amended by letter dated May 10, 2018, (see ADAMS Accession No. <u>ML130A935</u>) the staff notes that..." [underline added]. The correct ADAMS Accession No. is ML18130A935.	
41.	3.3.2.1.1 / 3-168	The next to the last paragraph states in part, "RAI 3.3.2.1.1 1, dated November 16, 2017, and Entergy's response, dated <u>December 16, 2017</u> , are documented in ADAMS Accession No. ML17320B099 and No. ML17347B473, respectively," [underline added]. Entergy's response to RAI 3.3.2.1.1-1 is dated December 12, 2017, 2018. Also, add a hyphen in the RAI number and in the same RAI number in the first line of the next paragraph.	

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42.	3.3.2.1.3 / 3-169	The second paragraph states in part, "...the staff needed additional information and therefore issued a request for additional information (RAI 3.3.2.1.Y-1) on January 22, 2018. RAI 3.3.2.1.Y-1 and Entergy's response, dated <u>February 20, 2018</u> , are documented in ADAMS Accession No. ML18022A941 and No. ML18051A531, respectively," [underline added]. Entergy's response is dated February 28, 2018.	
43.	3.3.2.1.3 / 3-169	The seventh paragraph states in part, "...the staff needed additional information and therefore issued a request for additional information. RAI 3.3.2.1.Y-2, dated January 22, 2018, and Entergy's response, dated <u>February 20, 2018</u> , are documented in ADAMS Accession No. ML18022A941 and No. ML18051A531, respectively," [underline added]. Entergy's response is dated February 28, 2018.	
44.	3.3.2.1.3 / 3-170	The thirteenth paragraph states in part, "...the staff needed additional information, and therefore issued a request for additional information. RAI 3.3.2.1.Y-3, dated January 22, 2018, and Entergy's response, dated <u>February 20, 2018</u> , are documented in ADAMS Accession No. ML18022A941 and No. ML18051A531, respectively," [underline added]. Entergy's response is dated February 28, 2018.	

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45.	3.3.2.3.16 / 3-192	The last sentence of the first paragraph under "Stainless Steel Strainers with a Filtration Intended Function" states, "RAI 3.3.2.3.16-1, dated November 16, 2017, and Entergy's response, dated <u>December 16, 2017</u> , are documented in ADAMS Accession Nos. ML17320B099 and ML17347B473," [<u>underline added</u>]. Entergy's response is dated December 12, 2017.	
46.	3.5.2 / 3-211	For item 1 & 2 this statement is made "in SER Section 3.5.2.1, reviews aging management review results..." I believe the word "reviews" should be "reviewed." Either would be fine, but the three bullets should be consistent.	
47.	3.5.2.1.1 / 3-215	3 rd paragraph: The sentence "Entergy also revised its USAR supplement (LRA Section A.1.41) plant procedures to disallow procurement of bolting material greater than 1 inch in diameter with actual measured yield strength less than 150 ksi." Entergy's position is to procure bolting with strength less than 150 ksi. As written this seems to be the opposite. Also, it appears there are some words missing from the sentence. It should read "Entergy also revised its USAR supplement (LRA Section A.1.41) to add an enhancement to revise plant procedures to only procure bolting material greater than 1 inch in diameter with actual measured yield strength less than 150 ksi."	
48.	3.5.2.3.4 / 3-235	3 rd paragraph has an irregular font in the first sentence in the phrase "evaluation of Entergy's Fire Protection program."	

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49.	4.1.2.1.2 / 4-3	1 st paragraph states "RBS uses a <u>concrete containment design...</u> " While true that there is a USAR section titled "Concrete Containment," it only describes the concrete fill outside the lower portion of the RBS "steel containment vessel." Calling it a concrete containment design is misleading.	
50.	4.2 / 4-6	Minor typo in last sentence on page - extra period in "RAI.4.7.3-1."	
51.	4.2.1.2 / 4-8	Minor typo- the date of August 6 should be August 15 for ML 18225A215	
52.	4.2.2.2 / 4-9	Minor typo- The last paragraph on the page is reviewing after the fluence values were corrected and should be referring to Revision 1 of 003N8442.	
53.	4.2.4.2 / 4-12	Minor typo "C28979-1" should be "C2879-1" The 10% value was increased to 11% in the RBG-47835 dated March 26, 2018	
54.	4.2.7.4 / 4-19	Minor typo- extra comma before period ".,"	
55.	4.3.2.2.1 / 4-25	Minor typos in second and third paragraphs on page. This should be identifying LRA Section 4.3.2.1 (instead of 4.3.1.2) and the correct RAIs for the non-Class 1 items is 4.3.2-1 (not 4.3.1-2) in second and third paragraphs.	
56.	4.6.2 / 4-34	Minor typo- December 26, 2018 should be 2017 Minor typo-3.0.3.2.07 should be 3.0.3.2.7 Minor typo- RAI 4.6.1a should be 4.6-1a Minor typo-extra comma on last sentence on page before period ".,"	

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57.	4.6.2 / 4-36	Minor typo- December 26, 2018 should be 2017 Minor typo- Extra " " mark after resolved (second full paragraph) Minor typo- ending ")" missing in first bullet paragraph	
58.	4.6.2 / 4-37	Minor typo - extra "will" in second paragraph after numbered paragraphs. Phrase includes "drywell head will,"	
59.	4.6.2 / 4-38	Minor typo- extra space in "17361A 396" Minor typo- Extra " " mark after resolved	
60.	4.6.2 / 4-39	Minor typo- period missing on last sentence in 4.6.2	
61.	4.6.3 / 4-39	Minor typo- last sentence "describe" should be "described"	
62.	4.7.1.2 / 4-40	Minor change- the date of revision 2 of the GEH 003N4606 is Jan. 2018.	
63.	4.7.3.2 / 4-45	Minor change- In the last sentence, it is suggested "strain hardening requirements" be replaced with "strain criteria" as was done earlier in the section.	
64.	Appendix A / A-1	Please add RBG-47873 to commitment 5 Also please note minor typo in LRA TOC for App. A- "River bend" should be initial caps.	
65.	Appendix B / B-1	Closing parenthesis missing in last sentence	
66.	Table B-1 / B-1	The May 25 th ML17174A355 is actually ML17142A355 in ADAMS	
67.	Table B-1 / B-2	The October 11 entry identifies MF9757 instead of 9747	
68.	Table B-1 / B-3	The October 31 entry identifies MF9757 instead of 9747 The Nov. 16 set 1 response was not found in ADAMS by date or ML number.	
69.	Table B-1 / B-10	The ML18121A029 May 3 letter identified Set 14 (not 15)	

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License Renewal SER: RBS

SER Section: Various

SER Section Reviewer: Entergy

Date: 10/10/18

Comment No.	Section/Pg.#	Comment	Resolution
70.	Table B-1 / B-10	The ML18123A495 identified RAI B.1.4-1 (not B.1.4-2)	
71.	Table B-1 / B-11	The date on ML18124A190 is May 25 th (not May 7 th) and the title does not match for call date. The date on ML18127A034 is May 25 th (not May 7 th) and the title does not match for call date. The date on ML18129A356 is May 29 th (not May 8)	
72.	Table B-1 / B-12	ML18143A686 should be 18143B686. Could not find ML18158A137 in ADAMS	

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 19
		INFORMATIONAL USE	PAGE 1 OF 2	
NRC Correspondence				

ATTACHMENT 9.4

NRC SUBMITTAL REVIEW

{Typical}

Letter #: RBF1 -18-193

Response Due: 10/22/18

Subject: Comments on License Renewal Safety Evaluation Report (SER) dated July 2018

Date Issued for Review: 10/18/18


Correspondence Preparer / Phone #: Pereira / 4621

Section I Letter Concurrence and Agreement to Perform Actions

POSITION / NAME	Action (concurrence, certification, etc.)	Signature (sign, interoffice memo, e-mail, or telecom)
Bill Maquire		SEE SIGNATURE
Jeffery Reynolds	Concurrence / Comments	N/A
Timothy Schenk	Concurrence / Comments	<i>[Signature]</i> 10-18-18
COMMENTS		

Section II Correspondence Screening

Does this letter contain commitments? If "yes," identify the commitments with due dates in the submittal and in Section III and initiate a PCRS LR-LAR to track implementation and/or completion of the commitment. When fleet letters contain commitments, a PCRS LR-LAR should be initiated with a CA assigned to each applicable site to enter the commitments into the site's commitment management system.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does this letter contain any information or analyses of new safety issues performed at NRC request or to satisfy a regulatory requirement? If "yes," reflect requirement to update the UFSAR in Section III.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does this letter require any document changes (e.g., procedures, DBDs, UFSAR, TS Bases, etc.), if approved? If "yes," indicate in Section III an action for the responsible department to determine the affected documents. (The Correspondence Preparer may indicate the specific documents requiring revision, if known or may initiate an action for review.)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does this letter contain information certified accurate? If "yes," identify the information and document certification in an attachment. (Attachment 9.5 must be used.)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 19
		INFORMATIONAL USE	PAGE 2 OF 2	
NRC Correspondence				

ATTACHMENT 9.4

NRC SUBMITTAL REVIEW


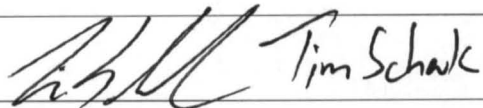
Section III


Actions and Commitments

Required Actions	Due Date	Responsible Dept.
<i>Note: Actions needed upon approval should be captured in the appropriate action tracking system</i>	N/A	N/A
Commitments <i>Note 1: If the letter contains commitments, a PCRS LR-LAR should be initiated to track implementation and/or completion.</i> <i>Note 2: When fleet letters contain commitments, a PCRS LR-LAR should be initiated with a CA assigned to each applicable site to enter the commitments into the site's commitment management system.</i>	Due Date	Responsible Dept.
	N/A	N/A

Section IV

Final Document Signoff for Submittal

Correspondence Preparer	Dennis Pereira 
Final Submittal Review (optional)	N/A
Responsible Department Head	 Tim Schalk

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 19
		INFORMATIONAL USE	PAGE 42 OF 45	
NRC Correspondence				

ATTACHMENT 9.14

CHECKLIST FOR OUTGOING CORRESPONDENCE


Sheet 1 of 4

(Typical)

This checklist focuses on the administrative aspects of outgoing correspondence and is intended primarily for docketed correspondence. Some items may not be applicable to non-docketed correspondence. Sections 1 through 4 and section 8 apply to any type of docketed correspondence. Sections 5 through 7 apply to LAR submittals only.

Section 1 - Entire Document	
1. Check text in letter & attachments is left justified.	X
2. Perform a grammar/spelling check.	X
3. Ensure page numbers are correct in header of cover letter and on attachments. The first page of the cover letter should not have a header or page number.	X
4. Verify acronyms are defined at first occurrence in cover letter and again at first occurrence in each attachment.	X

Section 2 - Cover Letter	
1. Check Docket Number(s) correct.	X
2. If LAR and applicable, verify discussion of the following are included: <ul style="list-style-type: none"> • relationship of LAR to topical reports • relationship of LAR to TSTFs • relationship of any pending LAR(s) that have been previously submitted. (i.e., coordination of approval of overlapping submittals) 	N/A
3. Check commitment and precedence statements are correctly reflected.	N/A
4. If applicable, define special-handling considerations, e.g., proprietary information.	N/A
5. If LAR and submittal is exigent or emergency, verify 50.90 criteria applicable to request being made is reflected.	N/A
6. If applicable, check desired date of approval is included.	N/A
7. If a LAR, check the grace period for implementation is included.	N/A

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 19
		INFORMATIONAL USE	PAGE 43 OF 45	
NRC Correspondence				


ATTACHMENT 9.14

CHECKLIST FOR OUTGOING CORRESPONDENCE

Sheet 2 of 4

Section 2 - Cover Letter (continued)	
8. Check header on second and proceeding pages includes letter number and correct page numbers. The first page of the cover letter should not have a header or page number.	X
9. Check "point of contact" identified.	X
10. If applicable, ensure affidavit statement is included.	N/A
11. Ensure list of attachments reflects those included. (exact match on titles)	X
12. Check cc list is correct.	X
13. If bcc list included, ensure list reflects current site guidance and includes appropriate subject matter experts. (bcc page should NOT include continuation of letter page #s – but should contain a standalone page number) (Check if applicable to ENN)	N/A

Section 3 - List of Regulatory Commitments on Attachment	
1. If commitments included, verify the following: <ul style="list-style-type: none"> • The cover letter contains "includes new commitments" statement. • Commitments are agreed upon by appropriate management and reflected in the NRC Submittal Review Form (Attachment 9.4). • Wording in Attachment matches wording in letter. • Scheduled completion date is specified, if applicable. 	N/A


	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 19
		INFORMATIONAL USE	PAGE 44 OF 45	
NRC Correspondence				

ATTACHMENT 9.14
Sheet 3 of 4

CHECKLIST FOR OUTGOING CORRESPONDENCE

Section 4 – Information to be Withheld from Public Disclosure	
<p>1. If proprietary information is included, check that:</p> <ul style="list-style-type: none"> • The scope of the information sought to be withheld is consistent with the affidavit and the 10 CFR 2.390 / SUNSI nondisclosure criteria. • Proprietary information is clearly annotated (bracketed or other method) • The affidavit meets the requirements of 10 CFR 2.390 (b)(1). • The address of the provider of proprietary information is provided to the NRC (has to be the specific address of the signer of the vendor letter that originally contained the proprietary info.) • A nonproprietary version is provided unless it would be of no value to the public. 	N/A
<p>2. If Personally identifiable information is included, check that:</p> <ul style="list-style-type: none"> • The cover letter clearly states that the attached documents contain PII. • Pages with PII are properly marked 	N/A
<p>3. If Safeguards Information is included, check that</p> <ul style="list-style-type: none"> • The cover letter does not contain safeguards information. • The cover letter is marked "Safeguards Information" with an indication that upon separation from the enclosure, the cover letter is to be considered decontrolled. • Pages are properly marked 	N/A
<p>4. If Security-related information is included, check that</p> <ul style="list-style-type: none"> • The cover letter clearly states that the attached document(s) contains S-RI. • Pages containing S-RI are properly marked 	N/A

Section 5 - LAR Attachment 1 - Analysis of Proposed Technical Specification Change:	
1. Verify acronyms are redefined at first occurrence in NSHC section.	N/A
2. Verify regulatory requirements statement in Applicable Regulatory Requirements/Criteria section is true.	N/A
3. Verify environmental statement is true.	N/A
4. If precedents are identified, ensure pertinent differences in application have been included. (If differences are known, identify them. If NOT, just list other plants.)	N/A

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED	EN-LI-106	REV. 19
		INFORMATIONAL USE	PAGE 45 OF 45	
NRC Correspondence				

ATTACHMENT 9.14

CHECKLIST FOR OUTGOING CORRESPONDENCE

Sheet 4 of 4

Section 6 - LAR Attachment 2 - Proposed Technical Specification Changes (mark-up)	
1. For electronic markups: <ul style="list-style-type: none"> • check font is correct on all pages. • check headers and footers correct • check previous TS amendment number marked out as deleted • check revision bars correctly reflect change and are in the right hand margin. 	N/A
2. Check TS pages are accurate as compared to the last SE received from the NRC (use clean pages from NRC SE to make this check)	N/A
3. Check changes reflected on each markup page are included in text of Attachment 1.	N/A

Section 7 - LAR Attachment 3 - Changes to TS Bases pages	
1. If NRC approval of bases pages is requested, check "FOR INFORMATION ONLY" is removed on Attachment 3 cover page and in Cover Letter list of attachments.	N/A
2. For electronic markups, check that change bars are in the right hand margin.	N/A
3. Check previous amendment number lined out as deleted.	N/A
4. Check Attachment 1 describes changes to all revised TS Bases that are included for NRC approval.	N/A

Section 8 -Mailing Verification	
1 For electronic submittals verify that the document conforms with NRC "E-Rule" standards for electronic submittals	
2 Verify that the document has been sent.	