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RBF1-18-0340

10 CFR 50.90

RBG-47925

December 20, 2018

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

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
NRC Docket No. 50-458
Facility Operating License No. NPF-47

- References:
- 1) Entergy Operations, Inc. letter to U. S. Nuclear Regulatory Commission "Application to Revise Technical Specifications to Adopt TSTF-542, Reactor Pressure Vessel Water Inventory Control," dated November 15, 2017. (ML17319A898)
 - 2) Entergy Operations, Inc. letter to U. S. Nuclear Regulatory Commission, "Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency requirements to a Licensee Controlled Program (TSTF-425)," dated February 28, 2018. (ML18067A115)
 - 3) Nuclear Regulatory Commission to Entergy Operations, Inc. "River Bend Station, Unit 1 – Issuance of Amendment RE: Revision to Technical Specifications to Adopt TSTF-542, Revision 2, Reactor Pressure Vessel Water Inventory Control," dated November 7, 2018. (ML18267A341)

Dear Sir or Madam,

On November 15, 2017 Entergy Operating, Inc. (Entergy) submitted a License Amendment Request (LAR) to adopt Technical Specification Task Force 542 (TSTF-542) at River Bend Station (RBS). (Reference 1)

On February 28, 2018, Entergy submitted an LAR to adopt TSTF-425 at RBS. (Reference 2)

On November 7, 2018 the U.S Nuclear Regulatory Commission (NRC) issued Amendment 193 (Reference 3) to the RBS Technical Specifications (TS) approving the implementation of TSTF-542. Issuance of Amendment 193 modified pages to the RBS TS that were submitted to the NRC in the TSTF-425 LAR. This letter supplements the original submittal of TSTF-425 LAR to:

1. Include new surveillances added to the RBS TS as a result of Amendment 193.
2. Update the text of surveillances whose language was modified as a result of Amendment 193.
3. Update the text of Conditions, Required Actions, and Completion Times that were modified by Amendment 193.
4. Update changes that were made as a result of TS content moving from one page to another from the addition or deletion of TS content as a result of Amendment 193.
5. Update changes to surveillance numbers that were made as a result of Amendment 193.
6. Update TS section title changes that were made as a result of Amendment 193.

TS page 3.5-7 of the original TSTF-425 LAR should be discarded. The changes submitted on TS page 3.5-7 have moved to page 3.5-8 as a result of Amendment 193 and are presented in the attachments to this letter.

This supplement letter also corrects an error identified in the original submittal of the TSTF-425 LAR. Page 3.3-4 was mistakenly labeled 3.3-5. The Amendment numbers on page 3.3-4 are also corrected in this supplement letter.

Entergy has determined that relocating the frequency of SRs added to, or modified from, the original TSTF-425 LAR identified in this supplement is consistent with TSTF-425, Revision 3; and with the NRC staff's model Safety Evaluation dated July 6, 2009 including the scope exclusions identified in the model Safety Evaluation.

Specifically, these surveillance frequencies are not:

1. Frequencies that reference other approved programs for the specific interval (such as the Inservice Testing Program or the Primary Containment Leakage Rate Testing Program).
2. Frequencies that are purely event driven (e.g., "Each time the control rod is withdrawn to the 'full out' position").
3. Frequencies that are event-driven but have a time component for performing the surveillance on a one-time basis once the event occurs (e.g., "within 24 hours after thermal power reaching 95% RTP").

4. Frequencies that are related to specific conditions (e.g., battery degradation, age, and capacity) or conditions for the performance of a surveillance requirement (e.g., "drywall to suppression chamber differential pressure decrease").

Changes to the frequency for these surveillances will be controlled under the Surveillance Frequency Control Program (SFCP) in accordance with TSTF-425. The SFCP provides the necessary administrative controls to ensure that surveillances related to testing, calibration, and inspection are conducted at a frequency necessary to assure the quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

Furthermore, TSTF-542 recognizes that the SFCP is acceptable for use in each SR that this supplement identifies as added to, or modified from, the original TSTF-425 LAR.

Attachment 1 contains a markup of TS pages from the original TSTF-425 LAR that were modified by Amendment 193 and the page number correction for TS page 3.3-4.

Attachment 2 contains the clean TS pages of the original TSTF-425 LAR with Amendment 193 incorporated and the page number correction for TS page 3.3-4.

Entergy has reviewed the information supporting a finding of no significant hazards consideration that was previously provided to the NRC in Reference 2. The information provided in this submittal does not affect the basis for concluding that the proposed license amendment does not involve a significant hazards consideration.

There are no regulatory commitments contained within this letter.

Should you have any questions or require additional information, please contact Timothy Schenk at 225-381-4177.

Respectfully,



Jeff W. Reynolds

JWR/twf

Attachment 1: Markup of TS Pages from original TSTF-425 LAR.
Attachment 2: Clean TS Pages.

cc: NRC Region IV Regional Administrator, w/o Enclosure
NRC Senior Resident Inspector – River Bend Station, Unit 1
Ji Young Wiley, Department of Environmental Quality, Office of Environmental Compliance, Radiological Emergency Planning and Response Section
Public Utility Commission of Texas, Attn: PUC Filing Clerk
NRC Project Manager

ATTACHMENT 1

Markup of TS Pages from original TSTF-425 LAR

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.4	<p>-----NOTE----- Not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. -----</p> <p>Perform CHANNEL FUNCTIONAL TEST.</p>	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.1.5	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.1.6	Verify the source range monitor (SRM) and intermediate range monitor (IRM) channels overlap.	Prior to withdrawing SRMs from the fully inserted position
SR 3.3.1.1.7	<p>-----NOTE----- Only required to be met during entry into MODE 2 from MODE 1. -----</p> <p>Verify the IRM and APRM channels overlap.</p>	In accordance with the Surveillance Frequency Control Program
SR 3.3.1.1.8	Calibrate the local power range monitors.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.5.3-1 to determine which SRs apply for each RCIC Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 2 and 5; and (b) for up to 6 hours for Functions 1, 3, and 4 provided the associated Function maintains RCIC initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	12 hours ←
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	92 days ←
SR 3.3.5.3.3	Calibrate the trip units.	92 days ←
SR 3.3.5.3.4	Perform CHANNEL CALIBRATION.	24 months ←
SR 3.3.5.3.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months ←

In accordance with the
 Surveillance Frequency
 Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME is \geq 36 hours.	12 hours ←
SR 3.5.2.2	Verify, for a required low pressure ECCS injection/spray subsystem, the suppression pool water level is \geq 13 ft 3 inches.	12 hours ←
SR 3.5.2.3	Verify, for the required High Pressure Core Spray (HPCS) System, the: <ul style="list-style-type: none"> a. Suppression pool water level is \geq 13 ft 3 inches; or b. Condensate storage tank water level is \geq 11 ft 1 inch. 	12 hours ←
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	31 days ←
SR 3.5.2.5	<p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. A low pressure coolant injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flow paths opened under administrative control. <p>-----</p> <p>Verify, for the required ECCS injection/spray subsystem, each 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.</p>	<p>31 days ←</p>

(continued)

In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem for ≥ 10 minutes	92 days ←
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated actuation signal.	24 months ←
SR 3.5.2.8	<p>-----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify the required LPCI or LPCS subsystem actuates on a manual initiation signal, or the required HPCS subsystem can be manually operated.</p>	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.</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.</p>	<p>F.1 Suspend movement of recently irradiated fuel assemblies in the primary containment and fuel building.</p>	<p>Immediately</p>

SURVEILLANCE REQUIREMENTS

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

(continued)

In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition B not met during movement of recently irradiated fuel assemblies in the primary containment or fuel building.	E.1 Suspend movement of recently irradiated fuel assemblies in the primary containment and fuel building.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Verify each control room AC subsystem has the capability to remove the assumed heat load.	24 months ←

In accordance with the Surveillance Frequency Control Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.3 Initiate action to restore required inverters to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.8.1 Verify correct inverter voltage, frequency, and alignments to required AC vital buses.	7 days ←

In accordance with the Surveillance Frequency Control Program

ATTACHMENT 2

Clean TS Pages

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.1.4 -----NOTE----- Not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ----- Perform CHANNEL FUNCTIONAL TEST.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.3.1.1.5 Perform CHANNEL FUNCTIONAL TEST.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.3.1.1.6 Verify the source range monitor (SRM) and intermediate range monitor (IRM) channels overlap.</p>	<p>Prior to withdrawing SRMs from the fully inserted position</p>
<p>SR 3.3.1.1.7 -----NOTE----- Only required to be met during entry into MODE 2 from MODE 1. ----- Verify the IRM and APRM channels overlap.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.3.1.1.8 Calibrate the local power range monitors.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

(continued)

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.5.3-1 to determine which SRs apply for each RCIC Function.
 2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 2 and 5; and (b) for up to 6 hours for Functions 1, 3, and 4 provided the associated Function maintains RCIC initiation capability.
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SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.3	Calibrate the trip units.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.4	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME is \geq 36 hours.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.2	Verify, for a required low pressure ECCS injection/spray subsystem, the suppression pool water level is \geq 13 ft 3 inches.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.3	Verify, for the required High Pressure Core Spray (HPCS) System, the: <ul style="list-style-type: none"> a. Suppression pool water level is \geq 13 ft 3 inches; or b. Condensate storage tank water level is \geq 11 ft 1 inch. 	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.5	<p>-----NOTES-----</p> <ul style="list-style-type: none"> 1. A low pressure coolant injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flow paths opened under administrative control. <p>-----</p> <p>Verify, for the required ECCS injection/spray subsystem, each 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.</p>	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem for ≥ 10 minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	<p>-----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify the required LPCI or LPCS subsystem actuates on a manual initiation signal, or the required HPCS subsystem can be manually operated.</p>	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.</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.</p>	<p>F.1 Suspend movement of recently irradiated fuel assemblies in the primary containment and fuel building.</p>	<p>Immediately</p>

SURVEILLANCE REQUIREMENTS

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

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition B not met during movement of recently irradiated fuel assemblies in the primary containment or fuel building.	E.1 Suspend movement of recently irradiated fuel assemblies in the primary containment and fuel building.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Verify each control room AC subsystem has the capability to remove the assumed heat load.	In accordance with the Surveillance Frequency Control Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.3 Initiate action to restore required inverters to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.8.1 Verify correct inverter voltage, frequency, and alignments to required AC vital buses.	In accordance with the Surveillance Frequency Control Program

