Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213
Tel 601-368-5138

Ron Gaston
Director, Nuclear Licensing

10 CFR 50.90

2CAN061901

June 18, 2019

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Supplemental Change Related to the Application to Technical Specification Actions to Address Inoperability of the Containment Building Sump

Arkansas Nuclear One, Unit 2
NRC Docket No. 50-368
Renewed Facility Operating License No. NPF-6

By letter dated December 19, 2018 (Reference 1), Entergy Operations, Inc. (Entergy), requested NRC approval of a proposed change to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs). The proposed amendment would establish Actions and Allowable Outage Times (AOTs) applicable to conditions where the ANO-2 containment building sump is inoperable. Note that the ANO-2 TSs have not been converted to the improved standard TSs (ISTS) of NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants."

The proposed amendment is related to Technical Specification Task Force (TSTF)-567-A, Revision 1, “Add Containment Sump TS to Address GSI-191 Issues”, which was developed to address resolution of Generic Safety Issue (GSI)-191, “Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance,” for ANO-2. However, TSTF-567 was prepared such that it could not be directly applied to non-ISTS plants without modification. This is because non-ISTS TSs, in general, do not contain a Safety Function Determination Program (SFDP) which, in part, was necessary to support the changes incorporated by TSTF-567.

The ANO-2 license amendment request based on TSTF-567 varied from the traveler approach in order to accommodate the ANO-2 TS format. In early May 2019, a potential issue associated with the proposed TS changes was identified. The issue involves the operability of the Containment Spray system as it relates to Actions associated with inoperable Containment Cooling Systems during periods when the containment sump is inoperable solely due to containment accident generated and transported debris exceeding the analyzed limit. This issue is discussed in detail in the enclosure to this letter.

Entergy notified the NRC of the above issue in teleconference on May 13, 2019. While no specific resolution was presented during the teleconference, the NRC requested that any resolution consider generic applicability to other non-ISTS plants.

The proposed resolution stated in the enclosure to this letter was developed following input received from the joint Owners Group Technical Specifications Task Force (TSTF) (industry). However, a generic resolution for all non-ISTS plants cannot be proposed since the TSs of non-ISTS plants differ significantly. Nevertheless, the TSTF intends to notify non-ISTS plants of the potential issue and the method proposed by Entergy in resolving the ANO-2 specific TS configuration.

Because the proposed resolution was not previously discussed or evaluated, Entergy has revised the No Significant Hazards Consideration (NSHC) presented in the original amendment request to include this discussion. The revised NSHC is provided in Attachment 4 of the enclosure to this letter. Affected markup, re-typed, and bases TS pages are included in Attachments 1, 2, and 3 of the enclosure to this letter.

No new regulatory commitments are included in this amendment request.

In accordance with 10 CFR 50.91, Entergy is notifying the State of Arkansas of Entergy's supplement to its application addressing containment sump inoperability by transmitting a copy of this letter and enclosure to the designated State Official.

If there are any questions or if additional information is needed, please contact Tim Arnold at 479-858-7826.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on June 18, 2019.

Sincerely,

ORIGINAL SIGNED BY RON GASTON

Ron Gaston

RG/dbb

REFERENCES:

1. Entergy Operations, Inc. letter to U. S. Nuclear Regulatory Commission, *License Amendment Request to Add Actions to Address Inoperability of the Containment Building Sump*, Arkansas Nuclear One, Unit 2 (2CAN121801) (ML18353B049), dated December 19, 2018

2. U. S. Nuclear Regulatory Commission email to Entergy Operations, Inc., *Request for Additional Information Regarding License Amendment Request to Add Technical Specification Actions to Address Inoperability of the Containment Building Sump* (EPID L-2018-LLA-0573) (2CNA041902) (ML19106A432), dated April 16, 2019

3. Entergy Operations, Inc. letter to U. S. Nuclear Regulatory Commission, *Response to Request for Additional Information Related to the Application to Technical Specification Actions to Address Inoperability of the Containment Building Sump* (EPID L-2018-LLA-0573) (2CAN041904) (ML19120A084), dated April 30, 2019

Enclosure: Supplemental Change Related to the Application to Technical Specification Actions to Address Inoperability of the Containment Building Sump

Attachments to Enclosure:

1. Technical Specification Page Markup
2. Re-typed Technical Specification Page
3. Technical Specification Bases Page Markup (For Information Only)
4. Revised No Significant Hazards Consideration

cc: NRC Region IV Regional Administrator

NRC Senior Resident Inspector – Arkansas Nuclear One

NRC Project Manager – Arkansas Nuclear One

Mr. Bernard R. Bevill
Arkansas Department of Health
Radiation Control Section
4815 West Markham Street
Slot #30
Little Rock, AR 72205

Enclosure to

2CAN061901

Supplemental Change Related to the Application to Technical Specification Actions to Address Inoperability of the Containment Building Sump

SUPPLEMENTAL CHANGE RELATED TO THE APPLICATION TO TECHNICAL SPECIFICATION ACTIONS TO ADDRESS INOPERABILITY OF THE CONTAINMENT BUILDING SUMP

By letter dated December 19, 2018 (Reference 1), Entergy Operations, Inc. (Entergy), requested NRC approval of a proposed change to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs). The proposed amendment would establish Actions and Allowable Outage Times (AOTs) applicable to conditions where the ANO-2 containment building sump is inoperable. Note that the ANO-2 TSs have not been converted to the improved standard TSs (ISTS) of NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants."

The proposed amendment is related to Technical Specification Task Force (TSTF)-567-A, Revision 1, “Add Containment Sump TS to Address GSI-191 Issues”, which was developed to address resolution of Generic Safety Issue (GSI)-191, “Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance,” for ANO-2. However, TSTF-567 was prepared such that it could not be directly applied to non-ISTS plants without modification. This is because non-ISTS TSs, in general, do not contain a Safety Function Determination Program (SFDP) which, in part, was necessary to support the changes incorporated by TSTF-567.

The TS definition of Operability in relation to a TS-required structure, system, or component (SSC) states, in part, that features necessary to support operability of a TS SSC must also be capable of performing the required support function in order to consider the supported feature to be operable. In accordance with Limiting Condition for Operation (LCO) 3.0.2, failure to meet an LCO (e.g., associated SSC is inoperable) requires the actions associated with the respective LCO to be met. The aforementioned SFDP provides an exception to this requirement in that the associated actions of the relevant TS-supported SSC need not be followed provided a loss of safety function does not exist and provided the inoperable support SSC is governed by the TSs. In this respect, the actions associated with the TS-support SSC will ensure all associated SSCs are restored to operable status in accordance with the support SSC TS.

TSTF-567 addressed conditions where a plant's containment sump had been declared inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits. Because TS SSCs supported by the containment sump would be rendered inoperable, a plant shutdown would be required without sufficient opportunity to resolve the condition. In conjunction with application of the SFDP, this configuration would be resolved by meeting the required actions of a newly developed TS governing the containment sump. While relying on the containment sump TS Actions, the LCO Actions associated with the supported TS SSCs would not be entered, thus avoiding an unnecessary shutdown.

The ANO-2 license amendment request based on TSTF-567 varied from the traveler approach to accommodate the ANO-2 TS. In early May 2019, Entergy was notified of a potential issue associated with the proposed TS changes. This issue is described below.

For Combustion Engineering plants, one TS SSC supported by the containment sump is the Containment Spray System (CSS). The ISTS requirements for both the CSS and the Containment Cooling System (CCS) are contained within a single TS. For some non-ISTS plants, such as ANO-2, these systems are contained in separate TSs. Under the ISTS changes in TSTF-567, entry into the actions of the common CSS/CCS TS that are specifically associated

with containment accident generated and transported debris exceeding the analyzed limit is avoided by adoption of the new containment sump TS and application of the SFDP. The actions associated with the CCS remain unaffected by containment sump inoperability such that associated CCS Actions would continue to be applied if a Containment Cooling group were to become inoperable.

The proposed new containment sump TS for ANO-2 includes wording that would avoid application of CSS TS Actions when the sump is inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits, consistent with the intent of TSTF-567. However, the Actions associated with the ANO-2 CCS (TS 3.6.2.3) provide specific restoration times for inoperable Containment Cooling groups PROVIDED one or both CCS trains are operable (depending on the number of CCS trains currently inoperable). An example is provided below (emphasis added):

a. *With one group of the above required containment cooling units inoperable and both containment spray systems OPERABLE, restore the inoperable group of cooling units to OPERABLE status within 7 days*

As stated previously, with the containment sump inoperable, the CSS is considered inoperable in accordance with LCO 3.0.2 and the TS definition of Operability. Because CCS TS 3.6.2.3 does not provide an action with a restoration allowance that does not rely on at least one CSS train being operable, if both a CCS train and the containment sump were inoperable simultaneously, CCS TS 3.6.2.3 would require the plant to be placed in Hot Standby within 6 hours and Hot Shutdown within the following 6 hours:

Otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. LCO 3.0.4.a is not applicable when entering HOT SHUTDOWN.

During the 90-day Completion Time provided in TSTF-567, it is reasonable to assume that a CCS train would be made inoperable for testing or maintenance. Because the TS Actions associated with inoperable CCS trains are dependent on the operability of Containment Spray trains, the inoperability of the containment sump coincident with one or more inoperable CCS trains would result in an unnecessary plant shutdown with insufficient time to recover either SSC. This defeats the intent of TSTF-567 to provide 90 days to restore a containment sump made inoperable due to containment accident generated and transported debris exceeding the analyzed limits.

ANO-2 notified the NRC of the above issue in teleconference on May 13, 2019. While no specific resolution was presented during the teleconference, the NRC requested that any resolution consider generic applicability to other non-ISTS plants.

To meet the intent of TSTF-567 and avoid an unnecessary shutdown when one or more ANO-2 Containment Cooling groups are inoperable coincident with the containment sump being inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits, Entergy proposes a Note be added to the ANO-2 CCS TS 3.6.2.3 as follows (note that LCO 3.6.4.1 is the proposed new containment sump TS for ANO-2):

> The containment spray systems may be considered OPERABLE with respect to ACTIONs a, b, and c above if solely inoperable due to containment accident generated and transported debris exceeding the analyzed limits and LCO 3.6.4.1, ACTION a, is being met.

The above Note was developed following input received from the joint Owners Group Technical Specifications Task Force (TSTF) (industry). However, a generic resolution for all non-ISTS plants cannot be proposed since the TSs of non-ISTS plants differ significantly. Nevertheless, the TSTF intends to notify non-ISTS plants of the potential issue and the method proposed by Entergy in resolving the ANO-2 specific TS configuration.

Given the addition of the above Note to CCS TS 3.6.2.3, appropriate actions will continue to be taken when one or more Containment Cooling groups are inoperable. Therefore, the proposed Note both eliminates the potential of an unnecessary shutdown when the ANO-2 containment sump is inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits while requiring restoration of inoperable Containment Cooling groups to operable status within the allowed outage times (AOTs) currently specified in CCS TS 3.6.2.3.

Based on the above information, Entergy has concluded that the proposed resolution continues to meet the intent of the original Reference 1 application and that of TSTF-567. A markup of the CCS TS page is included in Attachment 1 of this enclosure, and a revised (clean) version of the affected TS page included in Attachment 2 of this enclosure, both of which contain the proposed new Note as described above. In addition, a markup of the ANO-2 CCS TS Bases, which addresses the addition of the new Action Note, is provided in Attachment 3 of this enclosure for information only.

The proposed Note described above is consistent with the TSTF-567 allowance to avoid entry into the actions of the ISTS CSS/CCS TS because the Note provides an equal allowance specific to the separate ANO-2 CCS TS (the CSS TS is already addressed in the Reference 1 proposed new containment sump TS). Because the proposed Note addition was not previously discussed, Entergy has revised the No Significant Hazards Consideration (NSHC) presented in the original Reference 1 amendment request to include discussion of this Note. The revised NSHC is provided in Attachment 4 of this enclosure.

6.0 REFERENCES

1. Entergy Operations, Inc. letter to U. S. Nuclear Regulatory Commission, *License Amendment Request to Add Actions to Address Inoperability of the Containment Building Sump*, Arkansas Nuclear One, Unit 2 (2CAN121801) (ML18353B049), dated December 19, 2018

2. U. S. Nuclear Regulatory Commission email to Entergy Operations, Inc., *Request for Additional Information Regarding License Amendment Request to Add Technical Specification Actions to Address Inoperability of the Containment Building Sump* (EPID L-2018-LLA-0573) (2CNA041902) (ML19106A432), dated April 16, 2019

3. Entergy Operations, Inc. letter to U. S. Nuclear Regulatory Commission, *Response to Request for Additional Information Related to the Application to Technical Specification Actions to Address Inoperability of the Containment Building Sump* (EPID L-2018-LLA-0573) (2CAN041904) (ML19120A084), dated April 30, 2019

4. U. S. Nuclear Regulatory Commission letter to Entergy Operations, Inc., *Arkansas Nuclear One, Unit 2 - Issuance of Amendment Re: Adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision 3*, dated April 23, 2019 (EPID L-2018-LLA-0047) (2CNA041904) (ML19063B948)

ATTACHMENTS

1. Technical Specification Page Markup

2. Retyped Technical Specification Page

3. Technical Specification Bases Page Markup (For Information Only)

Enclosure Attachment 1 to

2CAN061901

Technical Specification Page Markup
(1 page)

CONTAINMENT SYSTEMS

CONTAINMENT COOLING SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.3 Two independent containment cooling groups shall be OPERABLE with two operational cooling units in each group.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION[1]:

a. With one group of the above required containment cooling units inoperable and both containment spray systems OPERABLE, restore the inoperable group of cooling units to OPERABLE status within 7 days.

b. With two groups of the above required containment cooling units inoperable and both containment spray systems OPERABLE, restore at least one group of cooling units to OPERABLE status within 72 hours. Restore both above required groups of cooling units to OPERABLE status within 7 days of initial loss.

c. With one group of the above required containment cooling units inoperable and one containment spray system inoperable, restore the inoperable spray system to OPERABLE status within 72 hours. Restore the inoperable group of containment cooling units to OPERABLE status within 7 days of initial loss.

Otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. LCO 3.0.4.a is not applicable when entering HOT SHUTDOWN.

Note 1: The containment spray systems may be considered OPERABLE with respect to ACTIONs a, b, and c above if solely inoperable due to containment accident generated and transported debris exceeding the analyzed limits and LCO 3.6.4.1, ACTION a, is being met.

Enclosure Attachment 2 to

2CAN061901

Re-Typed Technical Specification Page
(1 page)

CONTAINMENT COOLING SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.3 Two independent containment cooling groups shall be OPERABLE with two operational cooling units in each group.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION[1]:

a. With one group of the above required containment cooling units inoperable and both containment spray systems OPERABLE, restore the inoperable group of cooling units to OPERABLE status within 7 days.

b. With two groups of the above required containment cooling units inoperable and both containment spray systems OPERABLE, restore at least one group of cooling units to OPERABLE status within 72 hours. Restore both above required groups of cooling units to OPERABLE status within 7 days of initial loss.

c. With one group of the above required containment cooling units inoperable and one containment spray system inoperable, restore the inoperable spray system to OPERABLE status within 72 hours. Restore the inoperable group of containment cooling units to OPERABLE status within 7 days of initial loss.

Otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. LCO 3.0.4.a is not applicable when entering HOT SHUTDOWN.

Note 1: The containment spray systems may be considered OPERABLE with respect to ACTIONs a, b, and c above if solely inoperable due to containment accident generated and transported debris exceeding the analyzed limits and LCO 3.6.4.1, ACTION a, is being met.

Enclosure Attachment 3 to

2CAN061901

Technical Specification Bases Page Markup – Information Only
(1 page)

3/4.6.2.3 CONTAINMENT COOLING SYSTEM (continued)

Because the allowed outage time (AOT) of inoperable containment cooling groups are dependent on containment spray train(s) OPERABILITY, an ACTION Note is included that addresses conditions when one or more containment spray trains are inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits. Under such conditions, it is acceptable to consider affected containment spray trains to be OPERABLE with respect to applying the AOTs associated with inoperable containment cooling groups because the likelihood of an initiating event in the 90-day period to restore the containment sump to OPERABLE status provided by TS 3.6.4.1 is very small and there is margin in the associated containment sump accident debris analyses. In addition, the mitigating actions of containment sump TS 3.6.4.1, ACTION a, provides additional assurance that the effects of debris in excess of the analyzed limits will be mitigated while applying the AOTs associated with these configurations.

The addition of a biocide to the service water system is performed during containment cooler surveillance to prevent buildup of Asian clams in the coolers when service water is pumped through the cooling coils. This is performed when service water temperature is between 60 °F and 80 °F since in this water temperature range Asian clams can spawn and produce larva which could pass through service water system strainers.

If the components cannot be restored to an OPERABLE status in accordance with Actions “a”, “b”, or “c”, the plant must be brought to a MODE in which overall plant risk is minimized. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 within the following 6 hours. Remaining within the Applicability of the LCO is acceptable because the plant risk in MODE 4 is similar to or lower than MODE 5 (reference CE NPSD-1186-A, Technical Justification for the Risk Informed Modification to Selected Required Action End States for CEOG PWRs, October, 2001). In MODE 4 there are more accident mitigation systems available and there is more redundancy and diversity in core heat removal mechanisms than in MODE 5. However, voluntary entry into MODE 5 may be made as it is also an acceptable low-risk state. These Actions are modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves (CIVs) ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA. The containment isolation valves have been relocated to plant procedures.

Enclosure Attachment 4 to

2CAN061901

Revised No Significant Hazards Consideration

Revised No Significant Hazards Consideration

4.3 No Significant Hazards Consideration Analysis

The proposed amendment adds a new Technical Specification (TS) 3.6.4.1, "Containment Sump," and adds an action to address the condition of the containment sump made inoperable due to containment accident generated and transported debris exceeding the analyzed limits. The action provides time to correct or evaluate the condition in lieu of an immediate plant shutdown. This action is placed in a new specification on the containment sump that otherwise retains the existing TS requirements. An existing Surveillance Requirement (SR) is moved from TS 3.5.2 to the new specification.

In addition, an Action Note is added to TS 3.6.2.3, "Containment Cooling System," which supports the new containment sump specification by avoiding an unnecessary plant shutdown when the containment sump is inoperable due to containment accident generated and transported debris exceeding the analyzed limits coincident with one or more Containment Cooling groups being inoperable. The Action Note continues to require inoperable Containment Cooling groups to be restored to operable status within the current time limits established in TS 3.6.2.3.

Entergy Operations, Inc. (Entergy) has evaluated whether a significant hazards consideration is involved with the proposed change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   The proposed change adds a new specification to the TS for the containment sump and adds an Action Note to Containment Cooling System (CCS) TS 3.6.2.3. An existing SR on the containment sump is moved to the new specification. The new specification retains the existing requirements on the containment sump and the actions to be taken when the containment sump is inoperable with the exception of adding new actions to be taken when the containment sump is inoperable due to containment accident generated and transported debris exceeding the analyzed limits. The new action provides time to evaluate and correct the condition instead of requiring an immediate plant shutdown.

   The addition of an Action Note to TS 3.6.2.3 continues to require inoperable Containment Cooling groups to be restored to an operable status with the time frames established in the current specification while avoiding an unnecessary shutdown when one or more Containment Cooling groups are inoperable coincident with the containment sump being inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits.

   The containment sump and the CCS are not initiators of any accident previously evaluated. The containment sump is a passive component and the proposed change does not increase the likelihood of the malfunction. No physical change to the containment sump or CCS or change to any operation or testing requirements is involved with this amendment request. As a result, the probability of an accident is unaffected by the proposed change.

The containment sump is used to mitigate accidents previously evaluated by providing a borated water source for the Emergency Core Cooling System (ECCS) and Containment Spray System (CSS). The CCS ensures that 1) the containment air temperature will be maintained within limits during normal operation, and 2) adequate heat removal capacity is available when operated in conjunction with the CSS during post-Loss of Coolant Accident (LOCA) conditions. The design and capability of the containment sump and CCS assumed in the accident analysis are not changed. The proposed action requires implementation of mitigating actions while the containment sump is inoperable and more frequent monitoring of reactor coolant leakage to detect any increased potential for an accident that would require the containment sump. In addition, the new TS 3.6.2.3 Action Note does not change the current time allowances for restoration of inoperable Containment Cooling groups to an operable status. The consequences of an accident during the proposed action are no different than the current consequences of an accident if the containment sump is inoperable.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No

   The proposed change adds a new specification to the TS for the containment sump and adds an Action Note to CCS TS 3.6.2.3. An existing SR on the containment sump is moved to the new specification. The new containment sump specification retains the existing requirements on the containment sump and the actions to be taken when the containment sump is inoperable with the exception of adding new actions to be taken when the containment sump is inoperable due to containment accident generated and transported debris exceeding the analyzed limits. The new action provides time to evaluate and correct the condition instead of requiring an immediate plant shutdown.

   The addition of an Action Note to TS 3.6.2.3 continues to require inoperable Containment Cooling groups to be restored to an operable status with the time frames established in the current specification while avoiding an unnecessary shutdown when one or more Containment Cooling groups are inoperable coincident with the containment sump being inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits.

   The proposed change does not alter the design or design function of the containment sump, the CCS, or the plant. No new systems are installed or removed as part of the proposed change. The containment sump is a passive component and cannot initiate a malfunction or accident. Likewise, the CCS is an accident mitigation system and cannot cause an accident condition. No new credible accident is created that is not encompassed by the existing accident analyses that assume the function of the containment sump or CCS.

   Therefore, the proposed change does not create the possibility of a new or different kind of accident from an accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

   Response: No

   The proposed change adds a new specification to the TS for the containment sump and adds an Action Note to CCS TS 3.6.2.3. An existing SR on the containment sump is moved to the new specification. The new specification retains the existing requirements on the containment sump and the actions to be taken when the containment sump is inoperable with the exception of adding new actions to be taken when the containment sump is inoperable due to containment accident generated and transported debris exceeding the analyzed limits. The new action provides time to evaluate and correct the condition instead of requiring an immediate plant shutdown.

   The addition of an Action Note to TS 3.6.2.3 continues to require inoperable Containment Cooling groups to be restored to an operable status with the time frames established in the current specification while avoiding an unnecessary shutdown when one or more Containment Cooling groups are inoperable coincident with the containment sump being inoperable solely due to containment accident generated and transported debris exceeding the analyzed limits.

   The proposed change does not affect the controlling values of parameters used to avoid exceeding regulatory or licensing limits. No Safety Limits are affected by the proposed change. The proposed change does not affect any assumptions in the accident analyses that demonstrate compliance with regulatory and licensing requirements.

   Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based upon the reasoning presented above, Entergy concludes that the requested change involves no significant hazards consideration, as set forth in 10 CFR 50.92(c), “Issuance of Amendment.”