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June 28, 1996

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29
Supplement to LER 94-002 "ESF Switchgear Room Temperatures Could Exceed Allowable Limits", dated 03/28/94

GNRO-96/00077

Gentlemen:

This submittal serves as a supplement to Licensee Event Report 94-002 submitted on 03/28/94.

LER 94-002 noted that when an ESF Switchgear Room Cooler was taken out of service for maintenance, post-LOCA temperatures in certain switchgear rooms would exceed previously evaluated values. Consequently, the LER was submitted as an unanalyzed condition that significantly compromised plant safety. Subsequent review of reporting guidance has caused us to revise our view on reportability of this condition.

Periodic removal of room coolers from service is necessary for routine maintenance. In such cases, the associated switchgear room temperatures could increase to a value not previously evaluated under design basis accident (DBA) conditions, however, the effects of the increased temperature would be confined to the respective division. In other words, in the unlikely event that a DBA occurs while a room cooler has been removed from service, the ability of the plant to be shutdown and remain in a safe shutdown condition is maintained due to design redundancy. Since the loss of a division during a DBA has been analyzed with acceptable results, this condition does not constitute an unanalyzed condition that significantly compromised plant safety.

This position is reinforced by NUREG 1022, which provides additional guidance on applying the reportability requirements of 10CFR50.73(a)(2)(iii):

"It is not intended that these reporting criteria apply to minor variations in individual parameters or problems concerning single pieces of equipment. For example, at any time, one or more safety-related components may be out of service because of testing, maintenance, or a fault that has not been repaired. Any trivial single failure or minor error in performing surveillance tests could produce a situation in which two or more unrelated, safety related components are out of service. Although this may technically involve an unanalyzed condition, it is reportable only if the condition involves functionally related components, or if it significantly compromises plant safety."

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Considering the necessity to periodically take equipment out of service for maintenance, the plant's analyzed capability to withstand the loss of a single division, and the guidance of NUREG 1022, we have determined that the circumstances described in LER 94-002 do not constitute a reportable event or condition. As a result, we are revising the reportable status of this LER to voluntary.

It is worthwhile to note, however, that the ESF Switchgear Room Cooler condition has served to re-emphasize for us the necessity of preserving design redundancy while performing maintenance. As a consequence, we have implemented controls to ensure that actions commensurate with safety are taken at any time a room cooler is removed from service. The out of service time of equipment important to safety is closely monitored as a part of our maintenance rule implementation.

Should you have any questions about this retraction, please contact Riley Ruffin at (601) 437-2167.

Yours truly,



CRH/RR

Attachment

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