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G3NO-2008-00013

October 23, 2008

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

DOCKET: No. 52-024

SUBJECT: Response to NRC Request for Additional Information, Letter No. 11
(GG3 COLA)

REFERENCE: NRC Letter to Entergy Nuclear, *Request for Additional Information
Letter No. 11 Related to the SRP Section 1.9 for the Grand Gulf
Combined License Application*, dated October 6, 2008 (ADAMS
Accession No. ML082800151).

Dear Sir or Madam:

In the referenced letter, the NRC requested additional information on one item to support the review of certain portions of the Grand Gulf Unit 3 Combined License Application (COLA). The response to the following Request for Additional Information (RAI) is provided as Attachment 1 to this letter:

- RAI Question 01-1, Location of Information in FSAR Addressing Certain Chapter 11 RG 1.206 Section C.III.1 Regulatory Positions

Should you have any questions, please contact me or Mr. Tom Williamson. Mr. Williamson may be reached as follows:

Telephone: (601) 368-5786

Mailing Address: 1340 Echelon Parkway
Mail Stop M-ECH-21
Jackson, MS 39213

E-Mail Address: twilli2@entergy.com

D088
NFO

This letter contains commitments as identified in Attachment 2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 23, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "WKH" followed by a stylized name.

WKH/ghd

Attachments: 1. Response to RAI Question No. 01-1
2. Regulatory Commitments

cc (email unless otherwise specified):

Mr. T. A. Burke (ECH)
Mr. S. P. Frantz (Morgan, Lewis & Bockius)
Mr. B. R. Johnson (GE-Hitachi)
Ms. M. Kray (NuStart)
Mr. P. D. Hinnenkamp (ECH)

NRC Project Manager – GGNS COLA
NRC Director – Division of Construction Projects (Region II)
NRC Regional Administrator - Region IV
NRC Resident Inspectors' Office: GGNS

ATTACHMENT 1

G3NO-2008-00013

RESPONSE TO NRC RAI LETTER NO. 11

RAI QUESTION NO. 01-1

RAI QUESTION NO. 01-1

NRC RAI 01-1

In Table 1.9-203 of the Grand Gulf FSAR, Sections C.III.1 (11.2.1 (8)), C.III.1 (11.4.1 (6)), C.III.1 (11.5.2 (6), and 11.5.2 (7)), C.III.1 (11.5.3) and C.III.1 (11.5.4) of Regulatory Guide (RG) 1.206 are addressed in the Grand Gulf FSAR by COL information items. Therefore, the column labeled "Conformance Evaluation" for these entries in Table 1.9-203 should be modified to include the specific section of the Grand Gulf FSAR where these issues are addressed.

Entergy Response

FSAR Table 1.9-203 was added to the COLA as an NRC reviewer aid. There is no NRC requirement to list specific COLA references for every line item in RG 1.206. The intent of the Conformance Evaluation column in FSAR Table 1.9-203 is to indicate the extent of conformance with each RG 1.206 regulatory position and to clarify where it is addressed if not completely addressed in the FSAR section that corresponds to the evaluated regulatory position number. In general, the following method was used to populate the Conformance Evaluation column in the table:

- If the RG 1.206 regulatory position section indicated that no additional information was required in the application, then "Conforms" with no reference was included in the table. (See RG 1.206 RP C.III.1, 11.1 and FSAR Section 11.1 as an example.)
- If the FSAR section corresponding to the RG 1.206 regulatory position section (e.g., X.Y) provided all of the information, then "Conforms" with no reference was included in the table. [See RG 1.206 C.III.1, 11.4.1 (6th bullet) and FSAR Section 11.4.1 as an example.]
- If the FSAR information was provided in a section other than the RG 1.206 regulatory position section (e.g., X.Y) referenced, then a conformance statement and the applicable FSAR section were included in the table. [See RG 1.206 C.III.1, 11.2.1 (6th bullet) and FSAR Chapter 17 as an example.]
- If some of the information requested by the RG 1.206 regulatory position section was provided in the DCD and some in the FSAR, then a conformance statement and the DCD and FSAR sections were included in the table. [See RG 1.206 C.III.1, 11.2.1 (1st bullet), DCD Section 11.2 and FSAR Section 11.2 (specifically 11.2.2.3.3) as an example.]
- If the DCD provided all of the RG 1.206 regulatory position section requested information, then a conformance statement and only the DCD section were included in the table. [See RG 1.206 C.III.1, 11.2.1 (7th bullet) and DCD Section 11.2.4 as an example.]

This RAI specifically requests the location of information for several RG 1.206 regulatory positions sections; these are addressed below:

- C.III.1 [11.2.1 (8)] Information is contained in FSAR Section 11.2.2.3.3 (Note that the applicable FSAR section number was revised since COLA Rev 0 from 11.2.2.3 to 11.2.2.3.3.).
- C.III.1 [11.4.1 (6)] Information is contained in FSAR Section 11.4.1.
- C.III.1 [11.5.2 (6)] Information is contained in FSAR Section 11.5.4.8.
- C.III.1 [11.5.2 (7)] Information is contained in FSAR Section 11.5.4.8.
- C.III.1 (11.5.3) Information is contained in FSAR Section 11.5.4.6 and DCD Section 11.5.5.4.
- C.III.1 (11.5.4) Information is contained in FSAR Section 11.5.4.6 and DCD Section 11.5.5.

FSAR Table 1.9-203 will be revised to clarify the applicable FSAR and/or DCD reference for the RG 1.206 regulatory position sections discussed above (except for the second bullet above, which requires no clarification).

Proposed COLA Revision

FSAR Table 1.9-203 will be revised as indicated in the attached draft markup.

Markup of Grand Gulf COLA

The following markup represents Entergy's good faith effort to show how the COLA will be revised in a future COLA submittal in response to the subject RAI. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be somewhat different than as presented herein.

**Grand Gulf Nuclear Station, Unit 3
COL Application
Part 2, FSAR**

**TABLE 1.9-203 (Sheet 37 of 61)
CONFORMANCE WITH THE FSAR CONTENT GUIDANCE IN
RG 1.206**

GGNS COL 1.9-3-A

Section	Section Title	Conformance Evaluation
C.III.1 11.2.1(5)	Design Bases	Conforms. Addressed in DCD Sections 11.2.3 and 15.3.16 and in FSAR Section 2.4.13.
C.III.1 11.2.1(6)	Design Bases	Conforms. Quality Assurance Program requirements are addressed in Chapter 17.
C.III.1 11.2.1(7)	Design Bases	Conforms. Addressed in DCD Section 11.2.4.
C.III.1 11.2.1(8)	Design Bases	Conforms. <u>Addressed in Section 11.2.2.3.3.</u>
C.III.1 11.2.1(9)	Design Bases	Conforms. Addressed in DCD Section 11.2.2 and in FSAR Section 11.2.
C.III.1 11.2.2(1)	System Description	Conforms. Addressed in DCD Section 11.2.2.
C.III.1 11.2.2(2)	System Description	Conforms. Addressed in DCD Section 11.2.2.
C.III.1 11.2.2(3)	System Description	Conforms. Addressed in DCD Section 11.2.2.
C.III.1 11.2.2(4)	System Description	Conforms. Addressed in DCD Section 11.2.2.
C.III.1 11.2.3(1)	Radioactive Effluent Releases	Conforms. Addressed in DCD Sections 11.2 and 12.2, and in FSAR Section 12.2.
C.III.1 11.2.3(2)	Radioactive Effluent Releases	Conforms. Addressed in DCD Sections 11.2 and 12.2, and in FSAR Section 12.2.
C.III.1 11.3.1(1)	Gaseous Waste Management Systems: Design Bases	Addressed in DCD Section 11.3. Conforms with the following exception: No discussion is provided regarding the capability of and requirements for using portable processing equipment for refueling outages.

**Grand Gulf Nuclear Station, Unit 3
COL Application
Part 2, FSAR**

**TABLE 1.9-203 (Sheet 41 of 61)
CONFORMANCE WITH THE FSAR CONTENT GUIDANCE IN
RG 1.206**

GGNS COL 1.9-3-A

Section	Section Title	Conformance Evaluation
C.III.1 11.5.2 (5)	System Description	Conforms. Addressed in DCD Sections 3.1 and 11.5.
C.III.1 11.5.2 (6)	System Description	Conforms. <u>Addressed in Section 11.5.4.8.</u>
C.III.1 11.5.2 (7)	System Description	Conforms. <u>Addressed in Section 11.5.4.8.</u>
C.III.1 11.5.3	Effluent Monitoring and Sampling	Conforms. <u>Addressed in FSAR Section 11.5.4.6 and DCD Section 11.5.5.4.</u>
C.III.1 11.5.4	Process Monitoring and Sampling	Conforms. <u>Addressed in FSAR Section 11.5.4.6 and DCD Section 11.5.5.</u>
C.III.1 12.1.1	Policy Considerations	Conforms. Addressed in Sections 12.1 and 12.5.
C.III.1 12.1.2	Design Considerations	Conforms. Addressed in Section 12.5.
C.III.1 12.1.3	Operational Considerations	Conforms. Addressed in Sections 12.1 and 12.5.
C.III.1 12.2.1	Contained Sources	Conforms
C.III.1 12.2.2	Airborne Radioactive Material Sources	Conforms
C.III.1 12.3.1	Facility Design Features	Conforms
C.III.1 12.3.2	Shielding	Conforms
C.III.1 12.3.3	Ventilation	Conforms. Addressed in DCD Sections 9.4.1 and 12.3.

ATTACHMENT 2

G3NO-2008-00013

REGULATORY COMMITMENTS

REGULATORY COMMITMENTS

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will revise FSAR Table 1.9-203 as indicated in draft markups included in Attachment 1 of this letter, in Revision 1 of Part 2 of the COL application.	✓		Future COLA Submittal