

September 14, 2000

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U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Additional ANO-2 Provisions For ASME Code Case N-546

Gentlemen:

In letter dated June 15, 2000, Entergy Operations requested authorization to use three ASME Code Cases as alternatives to the requirements of ASME Section XI for Arkansas Nuclear One, Unit 2 (ANO-2). This letter included Code Cases N-508-1, N-532, and N-546. During discussion with the NRR Staff on Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel," additional provisions were requested beyond that currently provided in the code case. Code Case N-546 permits experienced personnel (such as licensed and non-licensed operators) to perform VT-2 visual inspections without having to be certified to comparable levels of ANSI N45.2.6. However, the code case does require personnel performing VT-2 inspections to have:

- a. At least 40 hours plant walkdown experience such as that gained by licensed and non-licensed operators, local leak rate personnel, system engineers, and inspection and NDE personnel,
- b. At least four (4) hours of training on ASME Section XI requirements and plant-specific procedures for VT-2 visual examinations, and
- c. Vision test requirements of IWA-2321, 1995 Edition of ASME Section XI.

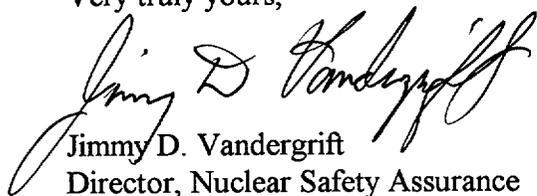
In addition to the above provisions, Entergy Operations commits to add the following provisions when qualifying personnel in accordance with Code Case N-546 on ANO-2:

- Qualify VT-2 examination personnel by examinations on the material covered under item b of the requirements of Code Case N-546, and
- Requalification of VT-2 examination personnel by examination every three (3) years to the requirements of item b of Code Case N-546.

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In our previous letter of June 15, 2000, we requested an approval date of September 15, 2000. Even though we intend to apply all or part of the code case alternatives during the fall 2000 2R14 outage, NRC approval can be delayed without near term outage impact. Therefore, we request that the above three code case alternatives be approved by October 13, 2000. Please contact Steve Bennett at 501-858-4626 for any additional information.

Very truly yours,



Jimmy D. Vandergrift
Director, Nuclear Safety Assurance

JDV/SAB

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