

October 20, 2000

Mr. Craig G. Anderson  
Vice President, Operations ANO  
Entergy Operations, Inc.  
1448 S. R. 333  
Russellville, AR 72801

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 2 - RELIEF REQUEST NOS. CEP-ISI-003, REVISION 0, CEP-ISI-004, REVISION 0, AND CEP-ISI-005, REVISION 0, RELATED TO THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) CODE REQUIREMENTS (TAC NO. MA9195)

Dear Mr. Anderson:

By letter dated June 15, 2000, as supplemented by letter dated September 14, 2000, Entergy Operations, Inc. (Entergy) requested relief from the requirements of Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) for the third 10-year inservice inspection (ISI) interval for Arkansas Nuclear One (ANO), Unit 2, pursuant to 10 CFR 50.55a(a)(3)(i). Specifically, Entergy requested authorization to use ASME Code cases as alternatives to the requirements of Section XI as follows: (1) ASME Code Case N-508-1, "Rotation of Serviced Snubbers and Pressure Relief Valves for the Purpose of Testing," as an alternative to the applicable requirements of IWA-4000 (ANO Request for Alternative CEP-ISI-003, Rev. 0); (2) ASME Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," as an alternative to the documentation and reporting requirements of IWA-4000 and IWA-6000, Division 1 (ANO Request for Alternative CEP-ISI-004, Rev. 0); and (3) ASME Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel," as an alternative to the qualification requirements of nondestructive examination (NDE) personnel as stated in IWA-2300 (ANO Request for Alternative CEP-ISI-005, Rev. 0).

The June 15, 2000, request and its supplement dated September 14, 2000, were reviewed against the requirements of 10 CFR 50.55a(a)(3)(i) and the ASME Code, Section XI, for Class 1, 2, and 3 components. The Nuclear Regulatory Commission (NRC) staff has determined that the proposed alternatives for rotating serviced snubbers and pressure relief valves for the purpose of testing (Code Case N-508-1), for the documentation and reporting of requirements (Code Case N-532), and qualifying NDE personnel (Code Case N-546), provide an acceptable level of quality and safety and are, therefore, authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the third inservice inspection interval at ANO, Unit 2, until such time

as the Code Cases are referenced in a future revision of 10 CFR 50.55a. At that time, if Entergy intends to continue to implement these Code Cases (N-508-1, N-532, and N-546), it must follow all provisions in Code Cases N-508-1, N-532, and N-546 with the limitations (if any) listed in 10 CFR 50.55a. The NRC staff's safety evaluation is enclosed.

Sincerely,

*/RA/*

Robert A. Gramm, Chief, Section 1  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-368

Enclosure: Safety Evaluation

cc w/encl: See next page

as the Code Cases are referenced in a future revision of 10 CFR 50.55a. At that time, if Entergy intends to continue to implement these Code Cases (N-508-1, N-532, and N-546), it must follow all provisions in Code Cases N-508-1, N-532, and N-546 with the limitations (if any) listed in 10 CFR 50.55a. The NRC staff's safety evaluation is enclosed.

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cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE RELIEF REQUEST ASSOCIATED WITH THE

THIRD 10-YEAR INTERVAL INSERVICE INSPECTION

ARKANSAS NUCLEAR ONE, UNIT 2

DOCKET NO. 50-368

1.0 INTRODUCTION

The Technical Specifications for Arkansas Nuclear One, Unit 2 (ANO-2) state that the in-service inspection (ISI) of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Class 1, 2, and 3 components shall be performed in accordance with Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," and applicable addenda, as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Nuclear Regulatory Commission (NRC or the Commission) pursuant to 10 CFR 50.55a(g)(6)(i). The regulations at 10 CFR 50.55a(a)(3) state that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC if the proposed alternatives would provide an acceptable level of quality and safety, or compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulation requires that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. Therefore, the applicable edition of Section XI of the ASME Code for the ANO-2 third 10-year ISI interval is the 1992 Edition, 1993 Addenda.

By a letter dated June 15, 2000, as supplemented by letter dated September 14, 2000, and pursuant to 10 CFR 50.55a(a)(3)(i), Entergy Operations, Inc. (Entergy or the licensee), requested the use of three Code Cases as alternatives to certain ASME Code Section XI requirements for ANO-2. Entergy identified the relief requests as CEP-ISI-003, Rev. 0, CEP-ISI-004, Rev. 0, and CEP-ISI-005, Rev. 0 in the above letters.

## 2.0 RELIEF REQUEST CEP-ISI-003, REV. 0

### 2.1 Background

The components for which relief is requested:

Code Class 1, 2, and 3 snubbers and pressure relief valves.

Applicable Code Requirement from which relief is requested (as stated by the licensee):

Article IWA-4000, Repair and Replacement, specifies the rules and requirements to be used when replacing, among other items, snubbers and pressure relief valves. The Owner is required to develop a repair/replacement program that meets the requirements of IWA-4140, "Repair/Replacement Program and Plan." When a component is replaced under this program, IWA-4000 requires the Owner to perform the following activities:

- Prepare a replacement plan and an accompanying Form NIS-2
- Perform specific ASME Section XI reviews and evaluations
- Obtain review and concurrence from an Authorized Nuclear Inspector

These requirements also apply when removing and installing snubbers and pressure relief valves solely for the purpose of testing.

Licensee's Proposed Alternative Examination (as stated):

Entergy Operations [Inc.] proposes to use Code Case N-508-1 when a snubber or pressure relief valve is removed from a system for the purpose of testing.

If the component being removed shows evidence of failure, Entergy Operations [Inc.] will perform repair/replacement activities in accordance with IWA-4000. The use of Code Case N-508-1 only eliminates unnecessary administrative controls and documentation requirements associated with replacing a snubber or relief valve when the component is rotated for testing. All other aspects of the replacement (e.g., design, manufacture, and operating limits and settings) are still maintained.

Licensee's Basis for Relief Request (as stated):

Code Case N-508-1 is contained in the 1998 Edition of Nuclear Code Cases, but has not been included in Regulatory Guide 1.147, "Inservice Inspection Code Cases Acceptability - ASME Section XI Division 1."

Currently, when a snubber or pressure relief valve is removed for the purpose of testing, two options are available:

- 1) Maintain the system or portion of the system in a degraded condition, while complying with Technical Specifications, until the removed item is tested, and refurbished, if required, and then reinstalled; or

- 2) Rotate a "like" item into the removed item's place and test the removed item at a later time.

For those facilities with ample spares, option 2) is the typical method for minimizing the duration of systems being in a degraded condition.

Per the requirements of IWA-4000, when a snubber or pressure relief valve is removed for repair or replacement, the activity must be treated as follows:

- Use of Repair/Replacement Program, plans, suitable evaluations, unique reviews within the licensee's ASME Section XI programs
- Review and concurrence by an Authorized Nuclear Inspector
- Maintenance of NIS-2 or other Section XI documentation to record the replacement

This activity requires the degraded system to remain out of service for the time that the item is removed, tested, refurbished if necessary, and replaced. Entergy Operations [Inc.] considers these Code provisions appropriate when the components are replaced due to design changes, failures, or expiration of component life. However, these activities appear excessive for removing and installing snubbers and pressure relief valves solely for the purpose of testing.

Entergy Operation's repair/replacement program governs snubbers and pressure relief valves rotated for the purpose of testing. Code Case N-508-1 provides alternative rules that eliminate rotating snubbers and pressure relief valves, for testing purposes, from the scope of the repair/replacement program. These alternative rules minimize the time a degraded system remains out of service and reduce documentation, evaluations, and personnel review time that is typically associated with ASME Section XI repair/replacement work activities. The technical requirements for replacing, testing, and repairing snubbers and pressure relief valves are still maintained in a manner consistent with the level of safety afforded by complying to ASME Section XI requirements.

The use of any Code Case is restricted to its complete use; selecting specific provisions within a Code Case is not an acceptable practice. Entergy Operations [Inc.] plans to implement item (a) of Code Case N-508-1 in a manner that ensures the items being removed and installed are comparable in their design, construction, and operating parameters to the extent that installation can be performed without requiring a plant design change or modification.

As stated in the Inquiry and Reply sections of Code Case N-508-1, the alternatives are only provided for IWA-4000 (IWA-7000 for Editions and Addenda prior to the 1991 Addenda). All other requirements of ASME Section XI apply, including any testing that may be performed as a result of Section XI. Code Case item (h) states that testing of removed snubbers and pressure relief valves, including required sample expansions, shall be performed in accordance with the Owner's test program. Using the Code Case has no affect on any requirements beyond ASME Section XI repair/replacement

requirements. Commitments and programs in effect at ANO-2 for monitoring snubber service life are unaffected by the alternatives of Code Case N-508-1.

## 2.2 Evaluation

Snubbers and pressure relief valves require periodic testing. To reduce system out-of-service time, testing is often accomplished by removing an existing snubber or pressure relief valve from service, installing a previously tested replacement, then testing the removed one at a later time for use as a future replacement. The current ASME Code stipulates that each snubber and pressure relief valve rotation comply with Section XI, Article IWA-4000 requirements. The IWA-4000 requirements impose extensive administrative and documentation controls. IWA-4910(d) requires that replacements be documented on the Owner's Report for Repairs and Replacements, Form NIS-2. Therefore, even if an operable snubber or pressure relief valve was replaced with a rebuilt item because the original one was nearing the end of its service life, the subject activity would be documented on an NIS-2 form. Code Case N-508-1, item (g), on the other hand, does not require the use of the NIS-2 form unless the replacement was required due to the original snubber or pressure relief valve being deficient or inoperable. The licensee states that the proposed alternative to use ASME Code Case N-508-1 at ANO-2 for rotation of serviced snubbers and pressure relief valves for the purpose of testing, in lieu of ASME Section XI, Article IWA-4000, provides an acceptable level of quality and safety.

When a snubber or pressure relief valve is removed for the purpose of testing, two options are available:

- (1) Maintain the system or portion of the system in a degraded condition, while complying with technical specifications, until the removed item is tested, refurbished, if required, and then reinstalled; or
- (2) Rotate a "like" item into the removed item's place and test the removed item at a later time.

For those facilities with ample spares, Option (2) is the typical method for minimizing the duration of systems being in a degraded condition.

According to the requirements of IWA-4000, when a snubber or pressure relief valve is removed for repair or replacement, the activity will involve (1) use of repair/replacement program and plans, suitable evaluations, and unique reviews within the licensee's ASME Section XI programs; (2) review and concurrence by an authorized nuclear inspector; and (3) maintenance of NIS-2 or other Section XI documentation to record the replacement.

This activity requires that the degraded system remain out of service for the time that the item is removed, tested, refurbished if necessary, and replaced. The licensee contends that these Code provisions are appropriate when the components are replaced due to design changes, failures, or expiration of a component's service life, but that this activity appears excessive for removing and installing snubbers and pressure relief valves solely for the purpose of testing.

The licensee's proposed alternative is to use Code Case N-508-1 for rotating snubbers and pressure relief valves, solely for the purpose of testing. The alternative requirements in the Code Case minimize the time a degraded system remains out of service and reduces

documentation, evaluations, and personnel review time that is typically associated with ASME Section XI repair/replacement work activities. The technical requirements for replacing, testing, and repairing snubbers and pressure relief valves are still maintained in a manner consistent with the level of safety afforded by complying with ASME Section XI requirements. The licensee stated that if the component being removed shows evidence of failure, the repair/replacement activities will be performed in accordance with IWA-4000. The use of Code Case N-508-1 would only eliminate unnecessary administrative controls and documentation requirements associated with replacing a snubber or pressure relief valve when the component is rotated for testing purposes. All other aspects of the replacement (e.g., design, manufacture, and operating limits and settings) are still maintained.

The licensee stated that the Code Case will be used in its entirety, and that it plans to implement Code Case N-508-1, item (a) in a manner that ensures the items being removed and installed are comparable in their design, construction, and operating parameters to the extent that installation can be performed without requiring a plant design change or modification. The licensee stated that the alternatives are only provided for IWA-4000. All other requirements of ASME Section XI apply, including any testing that may be performed as a result of other Section XI requirements. Code Case item (h) states that testing of removed snubbers and pressure relief valves, including required sample expansions, shall be performed in accordance with its testing program. In addition, the licensee stated that commitments and programs in effect at ANO-2 for monitoring snubber service life are unaffected by the alternative use of Code Case N-508-1.

The NRC staff finds that the same level of quality and safety is maintained when snubber or pressure relief valve rotation is performed in accordance with IWA-4000 or Code Case N-508-1. This is acceptable to the staff.

### 3.0 RELIEF REQUEST CEP-ISI-004, REV. 0

#### 3.1 Background

The components for which relief is requested:

Code Class 1, 2, 3, MC [Metal Containment] and CC [Concrete Containment] components subject to ISI, repair or replacement.

Applicable Code requirement from which relief is requested (as stated by the licensee):

IWA-6200 requires the Owner to prepare Inservice Inspection (ISI) Summary Reports, which contain completed Form NIS-1, "Owner's Report for Inservice Inspection," and Form NIS-2, "Owner's Report for Repair or Replacement." IWA-6240 requires the Owner to submit the ISI Summary Report to the enforcement and regulatory authorities having jurisdiction at the facility within 90 days from completing the inspections conducted during each refueling outage.

IWA-4900 reiterates the requirement to complete NIS-2 forms for repair and replacement activities.

Licensee's Proposed Alternative Examination (as stated):

Entergy Operations [Inc.] proposes to use Code Case N-532 with the following clarification regarding the provision in paragraph 2(c) of the Code Case for reporting corrective measures.

ASME Section XI uses the term "corrective measures" in two different ways. One use of the term involves Code-required activities such as repairs and replacements. The other use, as found in IWX-3000, involves maintenance activities that do not involve repairs or replacements. With this clarification, Entergy Operations [Inc.] proposes not to report corrective measures that only involve routine maintenance activities. These activities include, but are not limited to, the following:

- Tightening threaded fittings to eliminate leakage
- Torquing fasteners to eliminate leakage at bolted connections
- Replacing valve packing due to unacceptable packing leakage
- Tightening loosened mechanical connections on supports
- Adjusting and realigning supports
- Cleaning up corrosion on components resulting from leakage

Licensee's Basis for Relief Request (as stated):

Code Case N-532 is contained in the 1998 Edition of Nuclear Code Cases, but has not been included in Regulatory Guide 1.147, "Inservice Inspection Code Cases Acceptability - ASME Section XI Division 1."

By use of this Code Case, Entergy Operations [Inc.] personnel prepare an Owner's Activity Report Form OAR-1 upon completing each refueling outage. Included in the OAR-1 will be:

1. An abstract of all examinations and tests completed during the outage;
2. A listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service; and
3. An abstract for repairs, replacements, and corrective measures performed due to an item containing a flaw or relevant condition that exceeded acceptance criteria.

Each Form OAR-1 prepared during an inspection period will be available onsite for the NRC's review. All OAR-1 forms generated during an inspection period will be compiled and subsequently submitted following the end of each inspection period.

This alternative only affects documentation and reporting requirements specified in the Code. The proposed alternative will reduce the resources required to prepare NIS-2

forms and prepare and submit the ISI Summary Report after each refueling outage, as currently required by the Code. As discussed in the proposed alternative examination section above, Entergy Operations [Inc.] will not report corrective measures that only involve routine maintenance activities. Including these activities in the OAR-1 form required by Code Case N-532 would reflect a significant expansion of current requirements without a corresponding increase in safety or quality. Corrective measures that refer to Code-required activities, such [as] repairs and replacements, will be reported in compliance with Code Case N-532.

### 3.2 Evaluation

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee proposed to use Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," as an alternative to the repair and replacement documentation requirements and inservice summary report preparation and submission as required by IWA-4000 and IWA-6000, Division 1. The NRC staff reviewed the proposed alternative documentation requirements of Code Case N-532 and determined that although the required forms have changed, the information required by the Code is available. Code Case N-532 would require preparation of the Repair/Replacement Certification Record, Form NIS-2A. The completed form NIS-2A, shall be certified by an Authorized Nuclear Inservice Inspector (ANII) as defined in ASME Code, Section XI, IWA-2130 and shall be maintained by the Owner. Furthermore, the Owners Activity Report Form OAR-1 shall be prepared and certified by an ANII upon completion of each refueling outage. The OAR-1 form shall contain an abstract of applicable examinations and tests, a list of item(s) with flaws or relevant conditions that require evaluation to determine acceptability for continued service, and an abstract of repairs, replacements, and corrective measures performed as a result of unacceptable flaws or relevant conditions. Hence, the information provided in the documentation pertaining to the use of Code Case N-532 can be used in the same manner to assess the safety implications of Code activities performed during the outage.

The staff has determined that the proposed alternative documentation requirements of Code Case N-532 would provide an acceptable level of quality and safety as compared to that of the 1992 Editions through the 1993 Addenda of the ASME Code, Section XI, Subsections IWA-4000 and IWA-6000, Division 1.

### 4.0 RELIEF REQUEST CEP-ISI-005, REV. 0

#### 4.1 Background

The components for which relief is requested:

Code Class 1, 2, and 3 components subject to VT-2 visual examinations

Applicable Code requirement from which relief is requested (as stated by the licensee):

IWA-2300 requires personnel performing VT-2 visual examinations to be qualified in accordance with comparable levels of competency as defined in ANSI [American National Standards Institute] [Standard] N45.2.6.

Licensee's Proposed Alternative Examination:

Entergy Operations [Inc.] proposes to use the alternative requirements of Code Case N-546 in lieu of the requirements of IWA-2300 for qualification of VT-2 visual examination personnel. Entergy Operation's [Inc.] current ISI program contains the following controls pertaining to VT-2 examinations:

- Procedural guidelines for obtaining consistent, quality VT-2 visual examinations, in accordance with IWA-2210;
- Requirements to document and maintain records to verify qualifications of persons selected to perform VT-2 visual examinations, in accordance with IWA-1400(k); and
- Requirements to perform an independent review and evaluation of leakage by persons other than those that performed the VT-2 visual examinations, in accordance with IWA-1400(n).

In the letter dated September 14, 2000 the license added the following provisions when qualifying personnel in accordance with Code Case N-546:

- 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.

Licensee's Basis for Relief Request (as stated):

Code Case N-546 is contained in the 1998 Edition of Nuclear Code Cases, but has not been included in Regulatory Guide 1.147, "Inservice Inspection Code Cases Acceptability - ASME Section XI, Division 1."

ASME Section XI requires personnel who perform VT-2 examinations to be qualified in accordance with comparable levels of competency as defined in ANSI N45.2.6. Additionally, examination personnel must have natural or corrected near-distance vision acuity in at least one eye equivalent to a Snell fraction of 20/20 or a Jaeger Number 1 on a standard Jaeger test. Also, examining personnel must demonstrate a far-distance acuity that is equivalent to the near-distance requirement at 15 feet or Snell fraction of 20/30 at 20 feet.

Code Case N-546 permits experienced personnel (such as licensed and non-licensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination (NDE) personnel) 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:

- 1) 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.
- 2) At least four (4) hours of training on ASME Section XI requirements and plant-specific procedures for VT-2 visual examinations.
- 3) Vision test requirements of IWA-2321, 1995 Edition of ASME Section XI.

The qualification requirements in Code Case N-546 are not significantly different from the qualifications required for VT-2 visual examiner certification. Licensed and non-licensed operators, local leak rate engineers, system engineers, and inspection and NDE personnel typically have a sound working knowledge of plant components and piping layouts. This knowledge makes them acceptable candidates for performing VT-2 examinations. Therefore, this alternative provides a level of safety and quality consistent with the current ASME Section XI requirements.

#### 4.2 Evaluation

The ASME Code, Section XI, IWA-2300, requires that personnel performing VT-2 visual examinations be qualified in accordance with comparable levels of competency as defined in ANSI N45.2.6. The Code also requires that the examination personnel be qualified for near and far distance vision acuity. Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee proposed to use Code Case N-546 in lieu of the requirements of IWA-2300 for VT-2 visual examination personnel. The NRC staff considers the qualification requirements in Code Case N-546 to be comparable to those of the ASME Code, Section XI, paragraph IWA-2300, for VT-2 visual examination personnel. With regard to the selection of personnel to conduct the test, the Code Case states that licensed and non-licensed operators, local leak rate personnel, system engineers, and inspection and NDE personnel are eligible due to their plant experience. Those personnel typically have a sound working knowledge of plant components and piping layouts, making them acceptable candidates for performing VT-2 visual examinations. Furthermore, the licensee follows plant-specific procedures to obtain consistent VT-2 visual examination results. The Code Case also requires a vision test for examination personnel similar to that of the Code. The NRC staff also finds it necessary for the VT-2 visual examination personnel to demonstrate knowledge of Section XI and plant specific procedures for VT-2 visual examinations, and to demonstrate continued proficiency through periodic requalification in accordance with the frequency specified in IWA-2314 of the ASME Code (every three years). In their September 14, 2000, supplemental letter, the licensee included both of these provision in their proposed alternative.

Therefore, the staff has determined that the proposed alternative in relief request CEP-ISI-005, Rev. 0, would provide an acceptable level of quality and safety as compared to that of the 1992 Editions, through the 1993 Addenda of the ASME Code, Section XI, Subsection IWA-2300.

#### 5.0 CONCLUSION

With regard to Relief Request CEP-ISI-003, Rev. 0, the NRC staff has determined that Entergy's proposed alternative use of Code Case N-508-1 for rotation of serviced snubbers and

pressure relief valves for the purpose of testing in lieu of ASME Code, Section XI, Article IWA-4000 requirements provides an acceptable level of quality and safety. Therefore, the staff concludes that the use of Entergy's alternative to implement Code Case N-508-1 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the third 10-year ISI interval at ANO-2.

With regard to Relief Request CEP-ISI-004, Rev. 0, the NRC staff has determined that the proposed alternative documentation and reporting requirements of Code Case N-532 would provide an acceptable level of quality and safety as compared to that of the 1992 Edition, through the 1993 Addenda of the ASME Code, Section XI, Subsections IWA-4000 and IWA-6000. Therefore, the NRC staff concludes that the use of Entergy's alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the third 10-year ISI interval at ANO-2.

With regard to Relief Request CEP-ISI-005, Rev. 0, the NRC staff has determined that the proposed alternative qualification requirements of Code Case N-546 would provide an acceptable level of quality and safety as compared to that of the 1992 Edition, through the 1993 Addenda of the ASME Code, Section XI, Subsection IWA-2300. Therefore, the staff concludes that the use of Entergy's alternative to implement Code Case N-546 with the additional provisions pertaining to VT-2 examinations is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the third 10-year ISI interval at ANO-2.

Also, the use of Code Cases N-508-1, N-532 and N-546 is authorized for the third 10-year ISI interval at ANO-2 or until they are referenced in a future revision of 10 CFR 50.55a. At that time, if Entergy intends to continue to implement these code cases, it must follow all provisions in the subject code case with the limitations (if any) listed in 10 CFR 50.55a.

Primary Contributors: A. Keim  
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Date: October 20, 2000