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Michael A. Krupa  
Director  
Nuclear Safety & Licensing

December 6, 2000

U. S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
Mail Stop OP1-17  
Washington, DC 20555-0001

Subject: Entergy Operations, Inc.  
Request for Use of ASME Code Case N-616

Arkansas Nuclear One - Units 1 & 2  
Docket Nos. 50-313 & 50-368  
License Nos. DPR-51 & NPF-6

CNRO-2000-00036

Ladies and Gentlemen:

Pursuant to 10CFR50.55a(a)(3)(i), Entergy Operations, Inc. (Entergy) requests authorization to implement ASME Code Case N-616. As documented in Request for Alternative PWR-ISI-002, Rev. 0 (see attachment), Entergy plans to use this code case in lieu of removing insulation for VT-2 visual examinations of bolted connections in ASME Code Class 1, 2, and 3 systems borated for the purpose of reactivity control during system pressure tests, as required by IWA-5242(a).

This request applies to Arkansas Nuclear One – Units 1 and 2. The NRC recently approved the use of ASME Code Case N-616 for Entergy's Waterford Steam Electric Station – Unit 3.<sup>1</sup>

Entergy understands the NRC staff has developed positions over the years on the use of AISI Type 17-4 PH stainless steel (SA-564 Grade 630), AISI Type 410 stainless steel (SA-193 Grade 6), and A-286 stainless steel (SA-453 Grade 660) fasteners. To address its positions, the NRC has placed certain conditions on the use of these types of stainless steel alloys. Entergy has included these conditions, in advance, as part of the proposed alternative to facilitate dispositioning this request.

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<sup>1</sup> NRC letter from Mr. Robert A. Gramm to Mr. Charles M. Dugger, "Waterford Steam Electric Station, Unit 3 – Relief Request Related to Pressure-Retaining Bolted Connections in Class 1, 2, and 3 Borated Systems (TAC No. MB0010)," dated October 30, 2000

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Request for Use of ASME Code Case N-616  
CNRO-2000-00036  
December 6, 2000  
Page 2 of 2

Entergy requests the NRC approve PWR-ISI-002, Rev. 0 prior to the beginning of the upcoming spring refueling outage at ANO-1, which begins on March 24, 2001.

This letter contains no commitments.

Should you have any questions regarding this submittal, please contact Guy Davant at (601) 368-5756.

Very truly yours,

A handwritten signature in black ink that reads "M. A. Krupa". The signature is written in a cursive style with a large, prominent "K".

MAK/GHD/baa  
attachment

cc: Mr. C. G. Anderson (N-GSB-3C)

Mr. T. W. Alexion, NRR Project Manager (ANO-2)  
Mr. R. L. Bywater, NRC Senior Resident Inspector (ANO)  
Mr. E. W. Merschoff, NRC Regional Administrator, Region IV  
Mr. W. D. Reckley, NRR Project Manager (ANO-1)