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Director  
Nuclear Safety & Licensing

February 16, 2001

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-532

Arkansas Nuclear One - Unit 1  
Docket No. 50-313  
License No. DPR-51

Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29

River Bend Station  
Docket No. 50-458  
License No. NPF-47

Waterford Steam Electric Station – Unit 3  
Docket No. 50-382  
License No. NPF-38

CNRO-2001-00005

In a recent telephone conference call, the NRC staff requested that Entergy Operations, Inc., (Entergy) amend its submitted ASME Relief Request CEP-ISI-006, Rev. 1<sup>1</sup> to reflect our intent to report code-required maintenance activities documented on Form OAR-1. Attached is amended relief request CEP-ISI-006, Rev. 2, which contains the requested information. Revision bars in the page margins denote the text additions from the previous submittal as well as this one.

This letter contains no commitments.

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

Very truly yours,

MAK/GHD/baa  
attachment

<sup>1</sup> Letter No. CNRO-2000-00020, dated August 24, 2000, "Request for Use of ASME Code Case N-532"

ACH7

Request for Use of ASME Code Case N-532  
CNRO-2001-00005  
February 16, 2001  
Page 2 of 2

cc: Mr. C. G. Anderson (N-GSB)  
Mr. J. T. Herron (W-GSB-300)  
Mr. W. A. Eaton (G-ESC3-VPO)  
Mr. R. K. Edington (R-GSB-40)  
Mr. P. D. Hinnenkamp (M-ECH-579)

Mr. T. W. Alexion, NRR Project Manager (ANO-2)  
Mr. R. L. Bywater, NRC Senior Resident Inspector (ANO)  
Mr. T. R. Farnholtz, NRC Senior Resident Inspector (W3)  
Mr. T. L. Hoeg, NRC Senior Resident Inspector (GGNS)  
Mr. N. Kalyanam, NRR Project Manager (W3)  
Mr. E. W. Merschoff, NRC Regional Administrator, Region IV  
Mr. R. E. Moody, NRR Project Manager (RBS)  
Mr. T. W. Pruett, NRC Senior Resident Inspector (RBS)  
Mr. W. D. Reckley, NRR Project Manager (ANO-1)  
Mr. S. P. Sakerak, NRR Project Manager (GGNS)

**REQUEST FOR ALTERNATIVE  
CEP-ISI-006, Rev. 2**

**COMPONENT IDENTIFICATION**

Code Classes:	1, 2, 3, MC, and CC
References:	IWA-4900, IWA-6200 ASME Code Case N-532
Examination Category:	Not Applicable
Item Number:	Not Applicable
Description:	Alternative requirements to repair and replacement requirements and inservice summary report preparation and submission as required by IWA-4000 and IWA-6000
Component Numbers:	All Class 1, 2, 3, MC, and CC components subject to inservice inspection, repair and replacement.
Unit / Inspection Interval Applicability	ANO-1 – third (3 <sup>rd</sup> ) 10-year interval GGNS – second (2 <sup>nd</sup> ) 10-year interval RBS – second (2 <sup>nd</sup> ) 10-year interval W3 – second (2 <sup>nd</sup> ) 10-year interval

**CODE REQUIREMENTS**

IWA-6200 requires the preparation of 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 and Replacement". In accordance with IWA-6240, the ISI Summary Report is required to be submitted to the enforcement and regulatory authorities having jurisdiction at the plant within 90 days of the completion of the inservice inspections conducted each refueling outage.

IWA-4900 reiterates the requirement to complete NIS-2 forms for repairs and replacements.

**BASIS FOR ALTERNATIVE**

Pursuant to 10CFR50.55a(a)(3)(i), an alternative is requested on the basis that it provides an acceptable level of quality and safety.

Code Case N-532 was approved by the ASME Boiler and Pressure Vessel Code Committee on December 12, 1994, but is not yet included in the most recent listing of NRC approved code cases provided in Revision 12 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability – ASME Section XI Division 1."

Code Case N-532 provides an alternative to the current ASME Section XI repair and replacement documentation requirements, as well as regulatory reporting requirements relating to inservice inspection. This alternative will reduce the resources required to prepare NIS-2 forms and prepare and submit the ISI Summary Report currently required by the Code after each refueling outage. This is a significant reduction in the administrative burden required by ASME Section XI, IWA-6000.

By use of this code case, the following would be attached to an Owner's Activity Report Form OAR-1 upon completion of each refueling outage: 1) an abstract of all examinations and tests completed each refueling outage, 2) a listing of item(s) with flaws or relevant conditions that required evaluation to determine the 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 would be available onsite for the NRC's review. All OAR-1 forms generated during an inspection period would be compiled and subsequently submitted following the end of an inspection period.

This request to use Code Case N-532 includes the following clarification regarding reporting of "corrective measures". ASME Section XI uses the term "corrective measures" in two different ways. One use of the term, as found in IWX-3000, involves maintenance activities that do not involve repairs or replacements. With this clarification, Entergy Operations proposes not to report corrective measures which only include routine maintenance activities such as tightening threaded fittings to eliminate leakage, torquing of 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, etc.

Including these routine maintenance activities in the Owner's Activity Report Form OAR-1 required by Code Case N-532 would be a significant expansion of current requirements without any corresponding increase in safety or quality. Corrective measures which refer to Code required activities, such as repairs and replacements, will be reported in compliance with Code Case N-532.

Entergy Operations considers the alternative documentation and reporting requirements of Code Case N-532 to be a reasonable alternative and an improvement to existing requirements. Because the use of this alternative only affects documentation and reporting requirements, Entergy Operations considers this alternative to provide an acceptable level of quality and safety.

#### **PROPOSED ALTERNATIVE CRITERIA**

Entergy will use Code Case N-532 in its entirety with the clarification stated above regarding the provision in paragraph 2(c) of the Code Case for reporting corrective measures. Also, each OAR-1 form prepared during an inspection period shall be submitted within twelve months following the end of the inspection period.