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2CAN030106

U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
ANO-2 Second Ten-Year Inservice Inspection Relief Requests

Gentlemen:

Title 10 of the Code of Federal Regulations, 10CFR50.55a, requires (in part) that inservice inspection of certain ASME Code Class 1, 2, and 3 piping be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where alternatives are authorized or relief is granted by the Commission pursuant to 10CFR50.55a(a)(3)(i) or (a)(3)(ii). In order to obtain authorization or relief, the licensee must demonstrate that (1) the proposed alternatives provide an acceptable level of quality and safety, or (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Attached are eight relief requests pertaining to inservice inspections (ISI) performed during the second ten-year inservice inspection interval at Arkansas Nuclear One, Unit 2 (ANO-2), which ended on March 26, 2000. Relief Requests 2 ISI-01-2-001 through 004 concern the failure to attain the Code required 90% coverage for volumetric examinations on various components. Relief Request 2 ISI-01-2-005 requests relief from the examination requirements for certain welds and 2 ISI-01-2-006 through 008 requests relief for the required percentage coverage during certain period inspections.

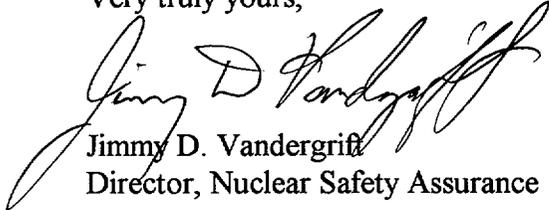
Since these relief requests are for the second ANO-2 ten-year interval which ended on March 26, 2000, no specific date for granting of these relief requests by the NRC is being requested. ISI examinations for the current interval will be conducted to the 1992 Edition with portions of the 1993 Addenda to Section XI of the ASME Code. ASME Code compliance for future inspections will be accomplished to the extent practical within this edition of the Code.

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Please contact Steve Bennett at 501-858-4626 regarding this submittal. There are no commitments associated with this letter.

Very truly yours,



Jimmy D. Vandergriff
Director, Nuclear Safety Assurance

JDV/sab
Attachments

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REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-001, Rev. 0

Components/Numbers: 2BCA-1-12" ISI #16-001 & 16-004

Code Classes: 1

References: ASME Section XI 1986 Edition, No Addenda Table IWB-2500-1

Examination Category: B-F

Item Number: B5.130 and B5.40 nozzle to safe end to circumferential weld and safe end to pressurizer surge nozzle

Description: Nozzle to safe end to circumferential weld and safe end to pressurizer surge nozzle

Unit / Inspection Interval Applicability: ANO Unit 2 – second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWB-2500-1, Examination Category B-F, Item B5.130 requires a surface examination and a volumetric examination on circumferential piping welds as defined by Figure IWB-2500-8. Item B5.40 requires a surface and volumetric examination of circumferential welds as defined by Figure IWB-2500-8.

II. Requested Authorization

Pursuant to 10CFR50.55a(g)(6)(i), Entergy requests relief from achieving the Code required greater than 90% coverage when performing volumetric examinations on the circumferential welds identified above.

III. Basis for Relief

Both of the referenced examinations were dissimilar metal welds that attached a stainless steel safe-end to a carbon steel/clad nozzle. Due to the coarse grain structure of the stainless steel safe-end and the inconel interface, a 45°, refracted longitudinal-wave search-unit was used. The search-unit was a dual element, 1.0 MHz, which was necessary to provide adequate sound penetration in the component. The rectangular design yielded a contact surface of approximately 1.25" x 1.35".

The examinations were limited to a one half-vee path; therefore credit could not be taken for skipping sound off the inside-diameter. Only shear-wave search units provide credible examinations when examining beyond one-half-vee and could not be used effectively for these applications due to the metallurgical design of the welds.

Geometric scanning limitations exist on both welds, as follows:

16-001 The downstream safe-end to pipe weld 16-003 limited the axial scan path due to interference with the search-unit at the toe of the 16-003 weld.

The slightly angled surface of the weld crown prevented scanning over the weld without lift-off of the search-unit. This condition is the limiting factor in reducing the scan coverage. Due to these conditions and the size of the transducer, the two directional coverage achieved on this weld was 68.18%. 100% of the weld was inspected using the dye penetrant inspection method.

16-014 The upstream safe-end to pipe weld 16-013 limited the axial scan path due to interference with the search-unit at the toe of the 16-013 weld.

The slightly angled surface of the weld crown prevented scanning over the weld without lift-off of the search-unit. This condition is the limiting factor in reducing the scan coverage. Due to these conditions and the size of the transducer, the two directional coverage achieved on this weld was 42.38%. 100% of the weld was inspected using the dye penetrant inspection method.

Entergy Operations is physically unable to perform the required inspections due to pressurizer surge nozzle design.

IV. Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(g)(6)(i) states:

The Commission will evaluate determinations under paragraph (g)(5) of this section that code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Entergy believes that requiring the greater than 90% coverage on these two welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(g)(6)(i).

REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-002, Rev. 0

Components/Numbers: CEDM Housing Welds ISI#2-W-69, 2-W-80, 2-W-81
Code Classes: 1
References: ASME Section XI 1986 Edition, No Addenda Table IWB-2500-1
Examination Category: B-O
Item Number: B14.10 Welds on CEDM Housings
Description: Lower Peripheral CEDM Housing Welds
Unit / Inspection Interval Applicability: ANO Unit 2 – second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWB-2500-1, Examination Category B-O, Item B14.10 requires a surface examination or a volumetric examination on the welds on the CEDM housings of 10% of the peripheral of the CEDM'S.

II. Requested Authorization

Pursuant to 10CFR50.55a(g)(6)(i), Entergy requests relief from achieving the Code-required greater than 90% coverage when performing volumetric examinations on the lower CEDM housing welds identified above.

III. Basis for Relief

Automated ultrasonic examinations were performed on the lower CEDM housing welds. Automated ultrasonic examinations were required due to interference's with the cooling shroud and the lower CEDM housing welds. This interference did not allow access to perform a manual inspection of the welds. The shroud is welded to the vessel head, which made access to the lower housing welds only achievable from the top of the CEDM. Once the automated device was lowered to the bottom housing welds, limited coverage was achieved, due to the interferences between the automated device and the cooling shroud. The scanning performed on these welds was accomplished using a 45° and 60° longitudinal. Axial scans were performed with the 45° and 60°longitudinal transducer while a 45° longitudinal transducer was used for the circumferential scan.

Coverage achieved was as follows:

ISI#2-W-69 84%

ISI#2-W-80 82%

ISI#2-W-81 84%

Entergy Operations is physically unable to perform the required inspections due to CEDM configuration.

IV. Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(g)(6)(i) states:

The Commission will evaluate determinations under paragraph (g)(5) of this section that code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Entergy believes that requiring the greater than 90% coverage on these three welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(g)(6)(i).

REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-003, Rev. 0

Components/Numbers: Vessel Welds ISI#01-006, 01-008, 01-012, 01-013, 01-018, 01-019, 01-020

Code Classes: 1

References: ASME Section XI 1986 Edition, No Addenda Table IWB-2500-1

Examination Category: B-A

Item Number: 01-006(B1.22), 01-08 and, 01-012(B1.11), 01-018 and 01-019(B1.12), 01-020(B1.30)

Description: See Below

Unit / Inspection Interval Applicability: ANO Unit 2 – second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWB-2500-1, Examination Category B-A, Items B1.1.22, B1.11, B1.12, B1.30 require a volumetric examination on the welds on the Reactor Vessel.

II. Requested Authorization

Pursuant to 10CFR50.55a(g)(6)(i), Entergy requests relief from achieving the Code-required greater than 90% coverage when performing volumetric examinations on the above mentioned welds.

III. Basis for Relief

Automated ultrasonic examinations were performed on the Unit 2 Reactor Vessel for the Second 10 Year Interval. This inspection had seven B-A welds that could not achieve the required greater than 90% coverage. Scanning was conducted bi-directionally on all vessel shell welds in accordance with Wesdyne Operating Procedures. The list below identifies each weld, the reason for limitation and the percent coverage achieved.

01-006 - Bottom Head Meridian - This weld examination was limited due to the location of the flow skirt. Coverage achieved was 60%.

- 01-008 - Bottom Head to Lower Shell - This weld examination was limited due to the location of the core lugs and core stop lugs. Coverage achieved was 66.7%.
- 01-012 - Lower shell to Middle Shell - This weld examination was limited due to the location of the specimen capsule holders. Coverage achieved was 83.66%.
- 01-013 - Mid Long Seam Weld @ 90° - This weld examination was limited due to the location of the specimen capsule holders. Coverage achieved was 77.66%.
- 01-018 - Upper Long Seam Weld @ 210° - This weld examination was limited due to the location of the nozzle boss. Coverage achieved was 81%.
- 01-019 - Upper Shell Long Seam @ 330° - This weld examination was limited due to the location of the nozzle boss. Coverage achieved was 86.5%.
- 01-020 - Upper Shell to Flange Circumferential Weld - This weld examination was limited due to the flange taper. Coverage achieved was 87.3%.

Entergy Operations is physically unable to perform the required inspections due to reactor vessel design.

IV Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(g)(6)(i) states:

The Commission will evaluate determinations under paragraph (g)(5) of this section that code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Entergy believes that requiring the greater than 90% coverage on these welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(g)(6)(i).

REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-004, Rev. 0

Components/Numbers: Vessel Welds ISI#01-021, 01-022, 01-023, 01-024, 01-025, 01-026

Code Classes: 1

References: ASME Section XI 1986 Edition, No Addenda Table IWB-2500-1

Examination Category: B-D

Item Number: B3.90

Description: See Below

Unit / Inspection Interval Applicability: ANO Unit 2 -- second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWB-2500-1, Examination Category B-D, Item B3.90, requires a volumetric examination on the inlet and outlet to shell welds on the Reactor Vessel.

II. Requested Authorization

Pursuant to 10CFR50.55a(g)(6)(i), Entergy requests relief from achieving the Code required greater than 90% coverage when performing volumetric examinations on the above mentioned welds.

III. Basis for Relief

Automated ultrasonic examinations were performed on the Unit 2 Reactor Vessel for the Second 10 Year Interval. This inspection had six B-D welds that could not achieve the required greater than 90% coverage. All of the nozzle welds were examined from within the nozzle bore and from the shell ID surface in accordance with Wesdyne Operating Procedure CARK-ISI-254 Rev.0. The list below identifies each weld, the reason for limitation and the percent coverage achieved.

01-021 - Outlet Nozzle to Shell @ 0° - This weld examination was limited due to the nozzle boss. Coverage achieved was 49%.

- 01-022 - Inlet Nozzle to Shell @ 60° - This weld examination was limited due to saddle geometry. Coverage achieved was 88%.
- 01-023 - Inlet Nozzle to Shell @ 120° - This weld examination was limited due to saddle geometry. Coverage achieved was 88%.
- 01-024 - Outlet Nozzle to Shell @ 180° - This weld examination was limited due to the nozzle boss. Coverage achieved was 49%.
- 01-025 - Inlet Nozzle to Shell @ 240° - This weld examination was limited due to saddle geometry. Coverage achieved was 88%.
- 01-026 - Inlet Nozzle to Shell @ 300° - This weld examination was limited due to the location of the nozzle boss. Coverage achieved was 88%.

Entergy is physically unable to perform the required inspections due to reactor vessel design.

IV Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(g)(6)(i) states:

The Commission will evaluate determinations under paragraph (g)(5) of this section that code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Entergy believes that requiring the greater than 90% coverage on these welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(g)(6)(i).

REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-005, Rev. 0

Components/Numbers: Vessel Supports Welds ISI#01-089, 01-090, 01-091

Code Classes: 1

References: ASME Section XI 1986 Edition, No Addenda Table IWB-2500-1

Examination Category: B-H

Item Number: B8.10

Description: See Below

Unit / Inspection Interval Applicability: ANO Unit 2 – second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWB-2500-1, Examination Category B-H, Item, B8.10 requires a volumetric or surface examination on the Integrally Welded Attachments on the Reactor Vessel.

II. Requested Authorization

Pursuant to 10CFR50.55a(a)(3)(ii), Entergy requests relief from performing the Code required examinations on the above mentioned welds.

III. Basis for Relief

The Reactor Pressure Vessel is supported by pads welded to the underside of two cold leg and one hot leg nozzle, which normally have stress loads in compression. It was found that, if the inspections were to be attempted from the bottom of the reactor vessel, the limited area from the vessel to the concrete wall would not allow enough room for scaffolding. In order to access the supports from the top of the vessel, it would be necessary to remove a number of access hole covers located in the shield plate. Once inside the access holes, carbon/graphite blocks(used for air cooling) exist. These blocks would have to be removed to access the vessel supports. Surveys taken above the blocks are approximately 45 mrem/hr, while under the blocks, dose rates are approximately 4.5 Rem/hr. An average of the expected doses while performing scaffold work in this area are assumed to be 2 Rem/hr. The following list contains estimates of personnel dose that would be received, if these inspections were pursued:

- It would take approximately 10.5 man-hrs to take measurements for scaffolding needed to inspect all three nozzles. Using an average of 2 Rem/hr for 10.5 hrs would give you an estimated dose of 13 Rem for taking measurements.
- To build scaffold 15 man-hrs are required for each support = 45 man-hrs at 2 Rem/hr = 90 Rem
- Three man-hrs to clean adhered scale, rust, and minor surface irregularities on each support weld. This could possibly create non-relevant indications. Nine man-hrs using 4 Rem/hr = 36 Rem.
- Two men at 1 hour per support to perform a magnetic particle inspection. Two man-hrs times 3 supports = 6 man-hrs at 4 Rem/hr = 24 Rem.
- Health Physics support for the job would be estimated to be 58 Rem.

Totaling the above items, the accumulated dose of this task would be 221 Rem.

All support pad base and weld materials were procured in compliance with ASME Section III, with all stresses within the requirements of ASME Section III. The supports are adequate for fatigue due to cyclic loads resulting from heatup, cooldown and seismic with a maximum usage factor of .0002.

The above doses would present an undue burden on the inspectors to perform these inspections.

IV. Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(a)(3) states:

“Proposed alternatives to the requirements of (c), (d), (e), (f), (g), and (h) of this section or portions thereof may be used when authorized by the Director of the Office of Nuclear Reactor Regulation. The applicant shall demonstrate that:

(i) The proposed alternatives would provide an acceptable level of quality and safety, or

(ii) Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.”

Entergy believes that requiring the inspection on these welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(a)(3)(ii).

REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-006, Rev. 0

Components/Numbers: Steam Generator 2E24B Weld #ISI-04-009, Pressurizer Welds
ISI-05-002 and 05-003

Code Classes: 1

References: ASME Section XI 1986 Edition, No Addenda Table IWB-
2412-1 Inspection Program B

Examination Category: B-B

Item Number: 04-009(B2.40), 05-002(B2.11) and 05-003(B2.12)

Description: See Below

Unit / Inspection Interval Applicability: ANO Unit 2 – second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWB-2500-1, Examination Category B-B, Table IWB-2412-1 B identifies minimum and maximum inspection percentage requirements for the number of inspections necessary for each period.

II. Requested Authorization

Pursuant to 10CFR50.55a(a)(3)(ii), Entergy requests relief from achieving the Code percentage requirements for the second period of the second interval.

III. Basis for Relief

During the ANO-2 2R11 refueling outage, two Category B-B welds were scheduled for inspection. These inspections would have been the only inspections required to meet the percentage requirements for the second period. Once into the outage, it was realized that with all the inspection work being performed on the "B" steam generator, enough insulation was removed and scaffolding built, that another Category B-B weld could be examined. The 67% maximum limit was exceeded once this third weld was inspected. Since only 7 Category B-B welds are in the distribution over the entire interval, moving this one weld raised the percentage for this period to 71.43%.

In performing this inspection during 2R11, estimates of dose savings are approximately 17.5 Rem. This was determined by multiplying 245 man-hrs, which is the time it would take to prepare the weld for inspection, by 72 mr/hr (the dose rate which this weld resides).

Presently, an ASME approved Code Case N-598 exists. This allows the maximum percentage increase in the second period from 67% to 75%. If this code case was applied to this category, ANO 2 inspection results would fall within the bounds of the new code case.

IV Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(a)(3) states:

“Proposed alternatives to the requirements of (c), (d), (e), (f), (g), and (h) of this section or portions thereof may be used when authorized by the Director of the Office of Nuclear Reactor Regulation. The applicant shall demonstrate that:

- (i) The proposed alternatives would provide an acceptable level of quality and safety, or*
- (ii) Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.”*

Entergy believes that requiring the limited percentages for the second period for a small number of welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(a)(3)(ii).

REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-007, Rev. 0

Components/Numbers: Steam Generator 2E24B Welds #ISI-04-027, ISI-04-028 and 04-029

Code Classes: 2

References: ASME Section XI 1986 Edition, No Addenda Table IWC-2412-1 Inspection Program B

Examination Category: C-A

Item Number: 04-027, 04-029(C1.10) and 04-028(C1.30)

Description: See Below

Unit / Inspection Interval Applicability: ANO Unit 2 – second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWC-2500-1, Examination Category C-A, Table IWC-2412-1 Program B identifies minimum and maximum inspection percentage requirements for the number of inspections necessary for each period.

II. Requested Authorization

Pursuant to 10CFR50.55a(a)(3)(ii), Entergy requests relief from achieving the Code percentage requirements for the second period of the second interval.

III. Basis for Relief

During the ANO-2 2R11 outage, only two Category C-A welds would have been scheduled for inspection, but three were completed. This was performed due to the close proximity of all the welds to be inspected. In removing insulation, access was allowed to all of the welds (#04-027, 04-028 and 04-029). In order to meet the percentage requirements for the second period only two of these welds were required to be inspected. Once into the outage, it was recognized that with the inspection work being performed on the "B" steam generator, enough insulation was removed and scaffolding built, that another Category C-A weld could be examined. The 67% maximum limit was exceeded once this third weld was inspected. Since only 8 Category C-A welds are in the distribution over the entire interval, moving this one weld raised the percentage for this period to 75%.

In performing this inspection during 2R11, estimates of dose savings are approximately 14.4 R. This was determined by multiplying 200 man-hrs, which is the time it would take to prepare the weld for inspection by 72 mr/hr (the dose rate which this weld resides).

Presently, an ASME approved Code Case N-598 exists that allows the maximum percentage increase in the second period from 67% to 75%. If this code case was applied to this category, ANO 2 Unit 2 would fall within the bounds of the new code case.

IV Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(a)(3) states:

“Proposed alternatives to the requirements of (c), (d), (e), (f), (g), and (h) of this section or portions thereof may be used when authorized by the Director of the Office of Nuclear Reactor Regulation. The applicant shall demonstrate that:

- (i) The proposed alternatives would provide an acceptable level of quality and safety, or*
- (ii) Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.”*

Entergy believes that requiring the limited percentages for the second period for a small number of welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(a)(3)(ii).

REQUEST FOR RELIEF
ANO UNIT 2-ISI-01-2-008, Rev. 0

Components/Numbers: Steam Generator 2E24A Welds #ISI-03-030, ISI-03-031 and 03-032

Code Classes: 2

References: ASME Section XI 1986 Edition, No Addenda Table IWC-2412-1 Inspection Program B

Examination Category: C-A

Item Number: 03-030, 03-031(C1.10) and 03-032(C1.20)

Description: See Below

Unit / Inspection Interval Applicability: ANO Unit 2 – second (2nd) 10-year interval

I. Code Requirement(s)

ASME Section XI, Table IWC-2500-1, Examination Category C-A, Table IWC-2412-1 Program B identifies minimum and maximum inspection percentage requirements for the number of inspections necessary for each period.

II. Requested Authorization

Pursuant to 10CFR50.55a(a)(3)(ii), Entergy requests relief from achieving the Code percentage requirements for the first period of the second interval.

III. Basis for Relief

During Arkansas Nuclear Ones 2R8 outage, two Category C-A welds were inspected. The completion of these two welds met the period distribution requirements for the first period. Once into ANO's 2R9 outage insulation was removed to gain access to another inspection on the steam generator. With this accomplished, along with other insulation removed for other reasons, it was determined that with a minimal amount of additional insulation removal weld #ISI 03-032 could be examined. In order to meet the percentage requirements for the first period, only two of these welds were required to be inspected. The 34% maximum limit was exceeded once this third weld was inspected. Since only 8 Category C-A welds are in the distribution over the entire interval, moving this one weld raised the percentage for this period to 37.5%.

In performing this inspection during 2R9, estimates of dose savings are approximately 5 Rem. This was determined by multiplying 500 man-hrs(estimate), which is the time it would take to ready the weld for inspection (scaffolding, insulation), by 10 mrem/hr (average field which work will be performed in).

Presently, an ASME approved Code Case N-598 exists. This allows the maximum percentage increase in the first period from 34% to 50%. If this code case was applied to this category, ANO 2 Unit 2 would fall within the bounds of the new code case.

IV Proposed Alternative Examinations

None

V. Conclusion

10CFR50.55a(a)(3) states:

“Proposed alternatives to the requirements of (c), (d), (e), (f), (g), and (h) of this section or portions thereof may be used when authorized by the Director of the Office of Nuclear Reactor Regulation. The applicant shall demonstrate that:

- (i) The proposed alternatives would provide an acceptable level of quality and safety, or*
- (ii) Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.”*

Entergy believes that requiring the limited percentages for the second period for a small number of welds results in a hardship without a compensating increase in the level of quality and safety. Therefore, we request the proposed relief be authorized pursuant to 10CFR50.55a(a)(3)(ii).