Entergy

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Michael A. Krupa
Director
Nuclear Safety & Licensing

CNRO-2002-00001

January 16, 2002

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Entergy Operations, Inc.
Letter of Intent – Proposed Alternatives to ASME Code Requirements

Arkansas Nuclear One - Units 1 & 2	Waterford Steam Electric Station – Unit 3
Docket Nos. 50-313 & 50-368	Docket No. 50-382
License Nos. DPR-51 & NPF-6	License No. NPF-38

Dear Sir or Madam:

By this letter Entergy Operations, Inc. (Entergy) is notifying the NRC staff of licensing actions associated with review and approval of repair techniques that are alternative methods from those required by ASME Code, as discussed below.

Entergy has refueling outages scheduled to begin in March, April, and October 2002 for Waterford Steam Electric Station – Unit 3 (Waterford 3), Arkansas Nuclear One – Unit 2 (ANO-2), and Arkansas Nuclear One – Unit 1 (ANO-1), respectively. During these outages, Entergy is scheduled to perform various inspections of Reactor Coolant System (RCS) components and piping in accordance with various requirements including those specified in NRC Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles." Such inspections may identify degraded conditions requiring repair activities.

As contingency measures in the event such conditions are identified, Entergy intends to submit requests proposing alternative methods to various Code repair requirements. Currently, Entergy expects these requests to involve the following topics:

1. Potential use of an improved Mechanical Nozzle Seal Assembly (MNSA) on various locations of the RCS

2. Potential use of ambient temper-bead weld repair on reactor vessel head penetrations

3. Potential relief from radiography requirements for repairs performed on reactor vessel head penetrations

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Historically, Entergy has submitted similar requests after discovering an actual need. However, due to recent industry experience with Inconel Alloy 600, Entergy believes it prudent to submit the appropriate requests as soon as possible in order to allow as much staff review time as possible. Given the relatively short duration of these planned outages, a prompt review and approval will be needed to avoid adverse impacts to the outage schedules in case degraded conditions are found.

To further support communications regarding the MNSA request, Entergy has requested a meeting with the appropriate NRC staff representatives on or about January 31, 2002 to discuss relevant technical information.

If you have any questions or require additional information, please contact Guy Davant at (601) 368-5756.

This letter contains no commitments.

Sincerely,

M. A. Krupa

MAK/GHD/baa

cc: Mr. C. G. Anderson (ANO)
Mr. W. R. Campbell (ECH)
Mr. J. T. Herron (W3)
Mr. J. E. Venable (ECH)

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. R. A. Gramm, Section Chief, NRR Licensing Project Directorate IV
Mr. E. W. Merschoff, NRC Regional Administrator, Region IV
Mr. N. Kalyanam, NRR Project Manager (W3)
Mr. W. D. Reckley, NRR Project Manager (ANO-1)