Entergy

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Michael R. Kansler
President

March 4, 2004
JPN-04-005
NL-04-021
ENO 2.04.021
BVY 04-022

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point Nuclear Generating Units No. 2 and No. 3
Docket No. 50-247, and 50-286
Pilgrim Nuclear Power Station
Docket No. 50-293
Vermont Yankee Nuclear Power Station
Docket No. 50-271
Response to RAI on Relief Requests to Use ASME Code Case N-600

References:

1. USNRC letter from Guy S. Vissing to Michael Kansler, regarding "Request for Additional Information Concerning Relief Request to Use American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Case N-600 (TAC NOS. MC0303, MC0336, MC0337, MC0338, and MC0339)", dated January 20, 2004.
2. Entergy letter to NRC, JPN-03-020/NL-03-130/ENO 1.2.03.091/BVY 03-63, regarding "Relief Request to Use ASME Code Case N-600", dated August 11, 2003.
3. USNRC letter from L. Raghavan to F. Cayia, dated March 21, 2003 regarding "Point Beach Nuclear Plant, Units 1 and 2 – Relief Request No. 9 Associated with the 10-Year Interval Inservice Inspection Program (TAC NOS. MB5403 and MB5404)".

Dear Sir or Madam:

Enclosed is Entergy's response to the request for additional information (RAI) letter (reference 1) from the Nuclear Regulatory Commission (NRC) regarding Entergy's requests for relief (reference 2) for James A. FitzPatrick Nuclear Power Plant (JAF), Indian Point Nuclear Generating Units No. 2 and No. 3 (IP2/IP3), Pilgrim Nuclear Power Station (PNPS), and Vermont Yankee Nuclear Power Station (VY) to use Code Case N-600 as an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI (Subsection IWA) requirements for welder qualifications.

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Entergy's response to the RAI questions is attached. Enclosures 1 through 5 are the revised requests for relief to use ASME Code Case N-600 for James A. FitzPatrick Nuclear Power Plant (JAF, Enclosure 1), Indian Point Nuclear Generating Unit No. 2 (IP2, Enclosure 2), Indian Point Nuclear Generating Unit No. 3 (IP3, Enclosure 3), Pilgrim Nuclear Power Station (PNPS, Enclosure 4), and Vermont Yankee Nuclear Power Station (VY, Enclosure 5). The proposed alternative would allow the Entergy plants the flexibility to utilize welders qualified by other licensees or owners (i.e., non-Entergy) under similar qualification programs. Pursuant to 10CFR50.55a(a)(3)(i), the proposed alternative to use Code Case N-600 will provide an acceptable level of safety and quality.

Approval is requested by March 30, 2004 to support the VY Spring 2004 outage which begins in early April 2004. Due to the similarity of these requests for relief, it is also requested that approval for JAF, IP2, IP3, and Pilgrim be granted at the same time.

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (Reference 3).

There are no new commitments made in this letter. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

Very truly yours,

Michael R. Kansler
President
Entergy Nuclear Operations, Inc.

Attachment: Entergy's Response to RAI Regarding Request for Relief to Use ASME Code Case N-600.

List of Enclosures:

1. James A. FitzPatrick Nuclear Power Plant, RR-32, revision 1.
2. Indian Point Generating Station Unit No. 2, RR-64, revision 1.
3. Indian Point Generating Station Unit No. 3, RR 3-33 (A), revision 1.
4. Pilgrim Nuclear Power Station, PRR-33, revision 1.
5. Vermont Yankee Nuclear Power Station, Relief Request No. ISI-012, revision 1.

cc:

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ENTERGY'S RESPONSE TO RAI REGARDING REQUEST FOR RELIEF TO USE ASME CODE CASE N-600

NRC Question 1:

Please note that although this appears to be one Request for Additional Information, the response should be specific for each plant as we intend to issue a safety evaluation specific for each plant.

Relief Request RR-32, Rev. 0, James A, Fitzpatrick Nuclear Power Station
Relief Request RR-64, Indian Point Nuclear Generating Station Unit No. 2
Relief Request RR-3-33(A), Indian Point Nuclear Generating Station Unit No. 3
Relief Request PRR-33, Pilgrim Nuclear Power Station
Relief Request ISI-012, Vermont Yankee Nuclear Power Station

Each specific relief request must be a stand-alone document and must state the Code of record for the specific Plant. Please modify each relief request to provide the exact Code of record applicable for each plant.

Entergy Response:

The code of record for each plant, which was included in the original submittal cover letter, has been added to revision 1 of the individual requests for relief (originally submitted as Enclosures 1 through 5).

NRC Question 2:

Each relief request shall state the technical basis for the relief requested, i.e. how does the proposed alternative provide an acceptable level of quality and safety? The proposed relief requests do not provide enough detail to justify the conclusion concerning the acceptable level of quality and safety. Please provide a more detail basis for justification that the proposed alternative provides an acceptable level of quality and safety for each plant.

Entergy Response:

Additional details to justify the conclusion that the proposed alternative provides an acceptable level of quality and safety for each plant have been added to revision 1 of the applicable plant's request for relief (Enclosures 1 through 5).

ENTERGY'S RESPONSE TO RAI REGARDING REQUEST FOR RELIEF TO USE ASME CODE CASE N-600

NRC Question 3:

Paragraph E.8 in Relief Requests, RR-32, RR-64, RR-3-33(A), and PRR-33 states, "Entergy will comply with the Quality Assurance requirements of ASME Section XI, Article IWA-1400." Justify this deviation from ASME Section XI Code Case N-600, paragraph (h) which states, "The Owner accepting the WPQ/BPQ shall comply with the Quality Assurance requirements of IWA-4142(a). (Relief Request ISI-012, for the Vermont Yankee Nuclear Power Station contains the reference shown in Code Case N-600).

Entergy Response:

The Code of Record for Vermont Yankee Nuclear Power Plant (VY) is ASME Section XI, 1998 Edition through 2000 Addenda. Therefore as the owner accepting the WPQ/BPQ, Vermont Yankee will comply with the Quality Assurance requirements of IWA-4142(a) as stated in the 1998 Edition of the Code.

For Indian Point Nuclear Generating Station Units 2 and 3 (IP2/IP3), James A. FitzPatrick Nuclear Power Plant (JAF), and Pilgrim Nuclear Power Station (Pilgrim), the applicable Code of Record is ASME Section XI, 1989 Edition, No Addenda. The 1989 Edition does not have a subparagraph IWA-4142(a). Instead, the applicable Quality Assurance requirements are included in Article IWA-1400 of the 1989 Edition of the ASME Code, Section XI, as submitted in the original requests for relief.

The ASME Code allows licensees to implement a later approved edition of the Code for repair/replacement activities, and the 1998 Edition, through 2000 Addenda of ASME Section XI was approved by reference in 10CFR50.55a. Therefore, Entergy will implement Code Case N-600 in its entirety, including the IWA-4142(a) requirements. Revision 1 of the requests for relief for IP2, IP3, JAF, and Pilgrim (Enclosures 1 through 4) reflect this change.

JAMES A. FITZPATRICK
THIRD TEN-YEAR INTERVAL INSERVICE INSPECTION PROGRAM
RELIEF REQUEST RR-32, Revision 1

Proposed Alternative
In Accordance with 10CFR50.55a(a)(3)(i)

--Alternative Provides Acceptable Level of Quality and Safety--

1. ASME Code Component(s) Affected

Component Numbers: All

Examination Category: All

Item Number: All

2. Applicable Code Edition and Addenda

The Code of Record for the third Inservice Inspection Interval is ASME Section XI Code, 1989 Edition, No Addenda.

3. Applicable Code Requirements

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

4. Reason for Request

ASME Code Case N-600 permits nuclear plant licensees to share welder qualifications with other licensees. This Code Case reduces welder qualification costs and provides each owner access to a larger resource pool of skilled, experienced, and qualified nuclear welders.

5. Proposed Alternative

The following alternative requirements will be implemented as defined by ASME Section XI Code Case N-600, "Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1", when using welders qualified by other licensees or owners (i.e., non-Entergy):

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
   a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
   b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, 1998 Edition, Article IWA-4142(a).
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

Basis for Use

ASME Section IX, "Welding Qualifications", requires that each organization qualify its own welders. Welder qualification responsibility cannot be subcontracted, and welder qualifications administered by one organization cannot be transferred to another organization. The basis for this requirement has become the subject of close scrutiny as the demand for efficiency, particularly among nuclear plant owners, has increased. Section IX's requirements for welder qualification are based, in part, on the fact that organizations with minimal welding experience may use Section IX. By requiring each organization to qualify its own welders, Section IX assures that all users attain some proficiency in evaluating welder skills. Welder qualification proficiency among nuclear owners, however, is not an issue. Extensive quality assurance programs mandate and continually reassess this proficiency.

The use of Code Case N-600 improves an owner's ability to attract quality welders by eliminating the obstacle of redundant performance qualification testing. It enables Owners to rely on each other's experience in selecting welders, permitting candidate selection to be based on actual field performance rather than qualification tests. It also builds the resource pool of welders who, in addition to welding skills, understand and can comply with the extensive documentation and quality assurance requirements associated with nuclear work. These skills as well as a variety of other skills unique to nuclear power (e.g., radiation control, site security programs, NRC interface, etc.) are retained when experienced nuclear welders are transferred between sites.

Based on the above described detailed qualification and testing requirements on using welders qualified by other licensees or owners (i.e., non-Entergy), Entergy believes the proposed alternative to use Code Case N-600 in its entirety provides an acceptable level of quality and safety, pursuant to 10 CFR 50.55a(a)(3)(i).

6. Duration of Proposed Alternative

It is proposed to use the alternative for the remainder of the Third Inservice Inspection Interval for James A. FitzPatrick Nuclear Power Plant.

7. Precedents

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

8. Attachment

None

INDIAN POINT GENERATING STATION UNIT NO. 2
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL
RELIEF REQUEST NO. RR-64, Revision 1

Proposed Alternative
In Accordance with 10CFR50.55a(a)(3)(i)

--Alternative Provides Acceptable Level of Quality and Safety--

1. ASME Code Component(s) Affected

Component Numbers: All

Examination Category: All

Item Number: All

2. Applicable Code Edition and Addenda

The Code of Record for the third Inservice Inspection Interval is ASME Section XI Code, 1989 Edition, No Addenda.

3. Applicable Code Requirements

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

4. Reason for Request

ASME Code Case N-600 permits nuclear plant licensees to share welder qualifications with other licensees. This Code Case reduces welder qualification costs and provides each owner access to a larger resource pool of skilled, experienced, and qualified nuclear welders.

5. Proposed Alternative

The following alternative requirements will be implemented as defined by ASME Section XI Code Case N-600, "Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1", when using welders qualified by other licensees or owners (i.e., non-Entergy):

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
   a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
   b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, 1998 Edition, Article IWA-4142(a).
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

Basis for Use

ASME Section IX, "Welding Qualifications", requires that each organization qualify its own welders. Welder qualification responsibility cannot be subcontracted, and welder qualifications administered by one organization cannot be transferred to another organization. The basis for this requirement has become the subject of close scrutiny as the demand for efficiency, particularly among nuclear plant owners, has increased. Section IX's requirements for welder qualification are based, in part, on the fact that organizations with minimal welding experience may use Section IX. By requiring each organization to qualify its own welders, Section IX assures that all users attain some proficiency in evaluating welder skills. Welder qualification proficiency among nuclear owners, however, is not an issue. Extensive quality assurance programs mandate and continually reassess this proficiency.

The use of Code Case N-600 improves an owner's ability to attract quality welders by eliminating the obstacle of redundant performance qualification testing. It enables Owners to rely on each other's experience in selecting welders, permitting candidate selection to be based on actual field performance rather than qualification tests. It also builds the resource pool of welders who, in addition to welding skills, understand and can comply with the extensive documentation and quality assurance requirements associated with nuclear work. These skills as well as a variety of other skills unique to nuclear power (e.g., radiation control, site security programs, NRC interface, etc.) are retained when experienced nuclear welders are transferred between sites.

Based on the above described detailed qualification and testing requirements on using welders qualified by other licensees or owners (i.e., non-Entergy), Entergy believes the proposed alternative to use Code Case N-600 in its entirety provides an acceptable level of quality and safety, pursuant to 10 CFR 50.55a(a)(3)(i).

6. Duration of Proposed Alternative

It is proposed to use the alternative for the remainder of the Third Inservice Inspection Interval for Indian Point Generating Station Unit No. 2.

7. Precedents

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

8. Attachment

None

INDIAN POINT GENERATING STATION UNIT NO. 3
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL
RELIEF REQUEST NO. RR 3-33(A), Revision 1

Proposed Alternative
In Accordance with 10CFR50.55a(a)(3)(i)

--Alternative Provides Acceptable Level of Quality and Safety--

1. ASME Code Component(s) Affected

Component Numbers: All

Examination Category: All

Item Number: All

2. Applicable Code Edition and Addenda

The Code of Record for the third Inservice Inspection Interval is ASME Section XI Code, 1989 Edition, No Addenda.

3. Applicable Code Requirements

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

4. Reason for Request

ASME Code Case N-600 permits nuclear plant licensees to share welder qualifications with other licensees. This Code Case reduces welder qualification costs and provides each owner access to a larger resource pool of skilled, experienced, and qualified nuclear welders.

5. Proposed Alternative

The following alternative requirements will be implemented as defined by ASME Section XI Code Case N-600, "Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1", when using welders qualified by other licensees or owners (i.e., non-Entergy):

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
   a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
   b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, 1998 Edition, Article IWA-4142(a).
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

Basis for Use

ASME Section IX, "Welding Qualifications", requires that each organization qualify its own welders. Welder qualification responsibility cannot be subcontracted, and welder qualifications administered by one organization cannot be transferred to another organization. The basis for this requirement has become the subject of close scrutiny as the demand for efficiency, particularly among nuclear plant owners, has increased. Section IX's requirements for welder qualification are based, in part, on the fact that organizations with minimal welding experience may use Section IX. By requiring each organization to qualify its own welders, Section IX assures that all users attain some proficiency in evaluating welder skills. Welder qualification proficiency among nuclear owners, however, is not an issue. Extensive quality assurance programs mandate and continually reassess this proficiency.

The use of Code Case N-600 improves an owner's ability to attract quality welders by eliminating the obstacle of redundant performance qualification testing. It enables Owners to rely on each other's experience in selecting welders, permitting candidate selection to be based on actual field performance rather than qualification tests. It also builds the resource pool of welders who, in addition to welding skills, understand and can comply with the extensive documentation and quality assurance requirements associated with nuclear work. These skills as well as a variety of other skills unique to nuclear power (e.g., radiation control, site security programs, NRC interface, etc.) are retained when experienced nuclear welders are transferred between sites.

Based on the above described detailed qualification and testing requirements on using welders qualified by other licensees or owners (i.e., non-Entergy), Entergy believes the proposed alternative to use Code Case N-600 in its entirety provides an acceptable level of quality and safety, pursuant to 10 CFR 50.55a(a)(3)(i).

6. Duration of Proposed Alternative

It is proposed to use the alternative for the remainder of the Third Inservice Inspection Interval for Indian Point Generating Station Unit No. 3.

7. Precedents

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

8. Attachment

None

PILGRIM RELIEF REQUEST NO. PRR-33, Revision 1
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL

Proposed Alternative
In Accordance with 10CFR50.55a(a)(3)(i)

--Alternative Provides Acceptable Level of Quality and Safety--

1. ASME Code Component(s) Affected

Component Numbers: All

Examination Category: All

Item Number: All

2. Applicable Code Edition and Addenda

The Code of Record for the third Inservice Inspection Interval is ASME Section XI Code, 1989 Edition, No Addenda.

3. Applicable Code Requirements

Article IWA-4400(b) - All welders shall be qualified by the repair organization in accordance with the requirements of the codes specified in the Repair Program in accordance with IWA-4120.

4. Reason for Request

ASME Code Case N-600 permits nuclear plant licensees to share welder qualifications with other licensees. This Code Case reduces welder qualification costs and provides each owner access to a larger resource pool of skilled, experienced, and qualified nuclear welders.

5. Proposed Alternative

The following alternative requirements will be implemented as defined by ASME Section XI Code Case N-600, "Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1", when using welders qualified by other licensees or owners (i.e., non-Entergy):

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
   a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
   b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, 1998 Edition, Article IWA-4142(a).
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

Basis for Use

ASME Section IX, "Welding Qualifications", requires that each organization qualify its own welders. Welder qualification responsibility cannot be subcontracted, and welder qualifications administered by one organization cannot be transferred to another organization. The basis for this requirement has become the subject of close scrutiny as the demand for efficiency, particularly among nuclear plant owners, has increased. Section IX's requirements for welder qualification are based, in part, on the fact that organizations with minimal welding experience may use Section IX. By requiring each organization to qualify its own welders, Section IX assures that all users attain some proficiency in evaluating welder skills. Welder qualification proficiency among nuclear owners, however, is not an issue. Extensive quality assurance programs mandate and continually reassess this proficiency.

The use of Code Case N-600 improves an owner's ability to attract quality welders by eliminating the obstacle of redundant performance qualification testing. It enables Owners to rely on each other's experience in selecting welders, permitting candidate selection to be based on actual field performance rather than qualification tests. It also builds the resource pool of welders who, in addition to welding skills, understand and can comply with the extensive documentation and quality assurance requirements associated with nuclear work. These skills as well as a variety of other skills unique to nuclear power (e.g., radiation control, site security programs, NRC interface, etc.) are retained when experienced nuclear welders are transferred between sites.

Based on the above described detailed qualification and testing requirements on using welders qualified by other licensees or owners (i.e., non-Entergy), Entergy believes the proposed alternative to use Code Case N-600 in its entirety provides an acceptable level of quality and safety, pursuant to 10 CFR 50.55a(a)(3)(i).

6. Duration of Proposed Alternative

It is proposed to use the alternative for the remainder of the Third Inservice Inspection Interval for Pilgrim Station.

7. Precedents

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

8. Attachment

None

VERMONT YANKEE NUCLEAR POWER STATION
THIRD 10-YEAR INSERVICE INSPECTION INTERVAL
RELIEF REQUEST NO. ISI-012, Revision 1

Proposed Alternative
In Accordance with 10CFR50.55a(a)(3)(i)

--Alternative Provides Acceptable Level of Quality and Safety--

1. ASME Code Component(s) Affected

Component Numbers: All

Examination Category: All

Item Number: All

2. Applicable Code Edition and Addenda

The Code of Record for the third Inservice Inspection Interval is ASME Section XI Code, 1998 Edition, through the 2000 Addenda.

3. Applicable Code Requirements

Articles IWA-4440(c) and (d), 1998 Edition, 2000 Addenda requires that the Owner / Repair Organization shall qualify all welders, welding operators, brazers, and brazing operators in accordance with the codes specified in the Repair / Replacement Plan.

4. Reason for Request

ASME Code Case N-600 permits nuclear plant licensees to share welder qualifications with other licensees. This Code Case reduces welder qualification costs and provides each owner access to a larger resource pool of skilled, experienced, and qualified nuclear welders.

5. Proposed Alternative

The following alternative requirements will be implemented as defined by ASME Section XI Code Case N-600, "Transfer of Welder, Welding Operator, Brazer, and Brazing Operator Qualifications Between Owners, Section XI, Division 1", when using welders qualified by other licensees or owners (i.e., non-Entergy):

1. Entergy will perform a technical review of the supplying Owner's records of Welder Performance Qualification (WPQ), Welding Operator Performance Qualification (WOPQ), or Brazer/Brazing Operator Performance Qualification (BPQ).
2. The supplying Owner will state in writing that the WPQ, WOPQ, or BPQ was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400, and that the tests were performed in accordance with ASME Section IX.
3. Entergy will obtain any necessary supporting information to satisfy the requirements of ASME Section IX, QW-301.4 or QB-301.4.

4. Entergy will require each welder, welding operator, brazer, or brazing operator to demonstrate proficiency by completing a renewal qualification test in accordance with ASME Section IX, QW-322.2(a) or QB-322(b), as applicable, with the following additional requirements.
   a. When the WPQ transfer involves prior groove tests, the renewal test shall use a groove configuration.
   b. When the WPQ transfer involves prior fillet tests, the renewal tests may use either a groove or a fillet configuration.
5. Entergy will accept the responsibility for the Performance Qualification Test(s), and will document this acceptance on the renewal test record(s) for the WPQ/WOPQ/BPQ. The renewal test record(s) will reference the original WPQ/WOPQ/BPQ test record(s) supplied by the Owner that provided the qualification.
6. Entergy will accept the responsibility for compliance with ASME Section IX, QW-322 or QB-322, as applicable.
7. Entergy will not accept qualifications from any Owner that was not the qualifying organization nor transfer the supplied qualifications to any other Owner.
8. Entergy will comply with the Quality Assurance requirements of ASME Section XI, 1998 Edition, Article IWA-4142(a).
9. Entergy will document the use of this Case on the record of the WPQ/WOPQ/BPQ for the renewal qualification test(s).

Basis for Use

ASME Section IX, "Welding Qualifications", requires that each organization qualify its own welders. Welder qualification responsibility cannot be subcontracted, and welder qualifications administered by one organization cannot be transferred to another organization. The basis for this requirement has become the subject of close scrutiny as the demand for efficiency, particularly among nuclear plant owners, has increased. Section IX's requirements for welder qualification are based, in part, on the fact that organizations with minimal welding experience may use Section IX. By requiring each organization to qualify its own welders, Section IX assures that all users attain some proficiency in evaluating welder skills. Welder qualification proficiency among nuclear owners, however, is not an issue. Extensive quality assurance programs mandate and continually reassess this proficiency.

The use of Code Case N-600 improves an owner's ability to attract quality welders by eliminating the obstacle of redundant performance qualification testing. It enables Owners to rely on each other's experience in selecting welders, permitting candidate selection to be based on actual field performance rather than qualification tests. It also builds the resource pool of welders who, in addition to welding skills, understand and can comply with the extensive documentation and quality assurance requirements associated with nuclear work. These skills as well as a variety of other skills unique to nuclear power (e.g., radiation control, site security programs, NRC interface, etc.) are retained when experienced nuclear welders are transferred between sites.

Based on the above described detailed qualification and testing requirements on using welders qualified by other licensees or owners (i.e., non-Entergy), Entergy believes the proposed alternative to use Code Case N-600 in its entirety provides an acceptable level of quality and safety, pursuant to 10 CFR 50.55a(a)(3)(i).

6. Duration of Proposed Alternative

It is proposed to use the alternative for the remainder of the Third Inservice Inspection Interval for Vermont Yankee Station.

7. Precedents

A similar request for relief was approved for Point Beach Nuclear Plant, Units 1 and 2 (TAC NOS. MB5403 and MB5404, dated March 21, 2003).

8. Attachment

None

DEPARTMENT OF VETERANS AFFAIRS
Veterans Health Administration
National Health Physics Program
2200 Fort Roots Drive
North Little Rock, AR 72114

MAR 04 2004

In Reply Refer To: 598/115HP/NLR

Nuclear Regulatory Commission (NRC)
ATTN: Document Control Desk
Washington, DC 20555

Re: Response to An Apparent Violation in Inspection Report No. 030-34325/2003-024 (DNMS); EA-04-019

We are responding to the NRC inspection report of February 6, 2004. We received the report on February 10, 2004, and informed Kenneth G. O'Brien by e-mail on February 11, 2004, that we would respond by letter.

We performed a reactive inspection on February 24-27, 2004, to identify causes of the violation, to confirm implementation of the corrective actions agreed upon between the hospital and NRC, and to assess the security of all radioactive material at the hospital.

The root causes for the apparent violation are likely "procedures, not used or not followed" in that there were not formal procedures requiring direct surveillance of unsecured radioactive material in the radiation safety area, and "human engineering, non-fault tolerant system" in that there was only a single physical security barrier for material stored in the waste compactor room. The corrective actions are listed in the NRC inspection report in Paragraph 2.0.b. Our reactive inspection confirmed full compliance has been achieved.

During the reactive inspection, we did not identify any regulatory violations, but we identified an opportunity for the hospital to complete a more comprehensive evaluation of the root causes for the apparent violation and their applicability to other hospital uses of radioactive materials. We will use the comprehensive evaluation results as a basis to determine other follow-up enforcement actions, as needed.

If you have any questions, please contact me at (501) 257-1571.

Sincerely,

E. Lynn McGuire
Director, National Health Physics Program

cc: NRC, Region III