

Entergy Nuclear Northeast Entergy Nuclear Operations, Inc. 440 Hamilton Avenue White Plains, NY 10601 Tel 914 272 3200 Fax 914 272 3205

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Michael R. Kansler President

April 14, 2004 JPN-04-010 NL-04-038 ENO 2.04.028

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

SUBJECT: James A. FitzPatrick Nuclear Power Plant Docket No. 50-333 Indian Point Nuclear Generating Units No. 2 and 3 Docket Nos. 50-247, and 50-286 Pilgrim Nuclear Power Station Docket No. 50-293 Request to Use the 1998 Edition, 2000 Addenda of the American Society of Mechanical Engineers (ASME) Section XI Code Requirements for the Examination of Reactor Vessel Closure Studs

 Reference:
USNRC letter from Robert A. Gramm to C. Lance Terry, dated September 3, 2003 regarding "Comanche Peak Steam Electric Station, Unit 2, Relief Request No. A-9, From the Requirements of the ASME Boiler and Pressure Vessel Code, Section XI, Concerning Second 10-Year Inservice Inspection Interval (TAC No. MB7946)."

2. Code of Federal Regulations, 10CFR50 (Revised as of January 1, 2003)

Dear Sir or Madam:

Pursuant to 10CFR50.55a(g)(4)(iv), Entergy Nuclear Operations, Inc. (ENO) hereby requests the Nuclear Regulatory Commission to approve the enclosed requests to use the 1998 Edition, 2000 Addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Table IWB-2500-1, Category B-G-1, requirements for the examination of the reactor vessel closure studs, when removed.

The Inservice Inspection Programs, under the current code of record (1989 Edition, No Addenda), require the reactor vessel closure studs be examined by both volumetric and surface examination methods. Entergy is requesting approval to use the 1998 Edition, 2000 Addenda of the ASME Section XI Code, which allows either the volumetric <u>or</u> the surface examination methods. The later ASME Code Edition / Addenda have been incorporated into 10CFR50.55a by reference (Reference 2).

Enclosed are four (4) requests 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), and Pilgrim Nuclear Power Station (Enclosure 4).

Approval is requested by October 15, 2004 to support the IP2 outage. Due to the similarity of these requests, it is also requested that approval for JAF, IP3, and Pilgrim be granted at the same time.

A similar request was approved for Comanche Peak Steam Electric Station, Unit 2 (Reference 1).

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.

Enclosures:

- 1. James A. FitzPatrick Nuclear Power Plant, Request No. R-33
- 2. Indian Point Generating Station Unit No. 2, Request No. R-71
- 3. Indian Point Generating Station Unit No. 3, Request No. R 3-40 (A)
- 4. Pilgrim Nuclear Power Station, Request No. R-41

cc:

Mr. Hubert J. Miller Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406-1415

Mr. Guy S. Vissing, Sr. Project Manager Project Directorate I Division of Licensing Project Management Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Mail Stop O-8-C2 Washington, DC 20555-0001 Mr. Patrick D. Milano, Sr. Project Manager Project Directorate I Division of Licensing Project Management Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Mail Stop O-8-C2 Washington, DC 20555-0001

Mr. Travis Tate, Project Manager Project Directorate I-2 Division of Licensing Project Management Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Mail Stop O-8-B1A Washington, DC 20555-0001 Resident Inspector's Office Indian Point Unit 3 U.S. Nuclear Regulatory Commission P.O. Box 337 Buchanan, NY 10511-0337

Senior Resident Inspector's Office Indian Point Unit 2 U.S. Nuclear Regulatory Commission P.O. Box 38 Buchanan, NY 10511-0038

Resident Inspector's Office James A. FitzPatrick U.S. Nuclear Regulatory Commission P.O. Box 136 Lycoming, NY 13093-0136

Senior Resident Inspector Pilgrim Nuclear Power Station U.S. Nuclear Regulatory Commission 600 Rocky Hill Road Mail Stop 66 Plymouth, MA 02360

Mr. Paul Eddy New York State Department of Public Service 3 Empire State Plaza Albany, NY 12223

Mr. Peter R. Smith President NYSERDA 17 Columbia Circle Albany, NY 12203-6399 ENCLOSURE 1 TO JPN-04-010 / NL-04-038 / ENO 2.04.028

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JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Request to Use 1998 Edition, 2000 Addenda of the ASME Section XI Code Requirements For the Examination of Reactor Vessel Closure Studs

> ENTERGY NUCLEAR OPERATIONS, INC. JAMES A. FITZPATRICK NUCLEAR POWER PLANT DOCKET NO. 50-333 DPR-59

JAMES A. FITZPATRICK THIRD TEN-YEAR INTERVAL INSERVICE INSPECTION PROGRAM REQUEST No. R-33

Proposed Use of Subsequent ASME Code Edition and Addenda In Accordance with 10CFR50.55a(g)(4)(iv)

1. ASME Code Component(s) Affected

Code Class:	1
References:	IWB-2500, Table IWB-2500-1
Examination Category:	B-G-1
Item Number:	B6.30
Parts Examined:	Reactor Vessel Closure Studs (when removed)

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. Proposed Subsequent Code Edition and Addenda (or Portion)

Entergy proposes to use the 1998 Edition, 2000 Addenda of the ASME Section XI, Table IWB-2500-1, Category B-G-1 Item B6.30 (Reactor Vessel Closure Studs, when removed) requirements for the examination of Closure Studs, when removed. The 1998 Edition, up to the 2000 Addenda of the ASME Section XI Code has been incorporated by reference in 10 CFR 50.55a(b) (reference 2003 Code of Federal Regulations, 10CFR50.55a(b)(2), revised as of January 1, 2003).

4. <u>Related Requirements</u>

The changes to Table IWB-2500-1 for Category B-G-1, Item B6.30, Reactor Vessel Closure Studs (when removed) examination criteria does not affect other parts of the Code. There are no limitations or modifications, which are associated with Category B-G-1, Item B6.30 in the 1998 Edition, 2000 Addenda of the ASME Section XI Code, addressed in 10 CFR 50.55a(b). There are no related requirements in the 1998 Edition, 2000 Addenda of the Code for Category B-G-1, Item B6.30 that would need to be implemented. Therefore, the proposed change will result in an acceptable level of quality and safety.

5. 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. ENCLOSURE 2 TO JPN-04-010 / NL-04-038 / ENO 2.04.028

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INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

Request to Use 1998 Edition, 2000 Addenda of the ASME Section XI Code Requirements For the Examination of Reactor Vessel Closure Studs

> INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 DOCKET NO. 50-247 DPR-26

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 THIRD 10-YEAR INSERVICE INSPECTION INTERVAL REQUEST NO. R-71

Proposed Use of Subsequent ASME Code Edition and Addenda In Accordance with 10CFR50.55a(g)(4)(iv)

1. ASME Code Component(s) Affected

Code Class:	1
References:	IWB-2500, Table IWB-2500-1
Examination Category:	B-G-1
Item Number:	B6.30
Parts Examined:	Reactor Vessel Closure Studs (when removed)

2. <u>Applicable Code Edition and Addenda</u>

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

3. Proposed Subsequent Code Edition and Addenda (or Portion)

Entergy proposes to use the 1998 Edition, 2000 Addenda of the ASME Section XI, Table IWB-2500-1, Category B-G-1, Item B6.30 (Reactor Vessel Closure Studs, when removed) requirements for the examination of Closure Studs, when removed. The 1998 Edition, up to the 2000 Addenda of the ASME Section XI Code has been incorporated by reference in 10 CFR 50.55a(b) (reference 2003 Code of Federal Regulations, 10CFR50.55a(b)(2), revised as of January 1, 2003).

4. <u>Related Requirements</u>

The changes to Table IWB-2500-1 for Category B-G-1, Item B6.30, Reactor Vessel Closure Studs (when removed) examination criteria does not affect other parts of the Code. There are no related requirements in the 1998 Edition, 2000 Addenda of the ASME Section XI Code that would need to be implemented. Therefore, the proposed change will result in an acceptable level of quality and safety.

5. Duration of Proposed Alternative

It is proposed to use the alternative for the remainder of the Third Inservice Inspection Interval for Indian Point Nuclear Generating Unit No. 2 (IP2).

ENCLOSURE 3 TO JPN-04-010 / NL-04-038 / ENO 2.04.028

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INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

Request to Use 1998 Edition, 2000 Addenda of the ASME Section XI Code Requirements For the Examination of Reactor Vessel Closure Studs

> INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 DOCKET NO. 50-286 DPR-64

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 THIRD 10-YEAR INSERVICE INSPECTION INTERVAL REQUEST NO. R 3-40 (A)

Proposed Use of Subsequent ASME Code Edition and Addenda In Accordance with 10CFR50.55a(g)(4)(iv)

1. ASME Code Component(s) Affected

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Code Class:	1
References:	IWB-2500, Table IWB-2500-1
Examination Category:	B-G-1
Item Number:	B6.30
Parts Examined:	Reactor Vessel Closure Studs (when removed)

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. Proposed Subsequent Code Edition and Addenda (or Portion)

Entergy proposes to use the 1998 Edition, 2000 Addenda of the ASME Section XI, Table IWB-2500-1, Category B-G-1 Item B6.30 (Reactor Vessel Closure Studs, when removed) requirements for the examination of Closure Studs, when removed. The 1998 Edition, up to the 2000 Addenda of the ASME Section XI Code has been incorporated by reference in 10 CFR 50.55a(b) (reference 2003 Code of Federal Regulations, 10CFR50.55a(b)(2), revised as of January 1, 2003).

4. <u>Related Requirements</u>

The changes to Table IWB-2500-1 for Category B-G-1, Item B6.30, Reactor Vessel Closure Studs (when removed) examination criteria does not affect other parts of the Code. There are no related requirements in the 1998 Edition, 2000 Addenda of the ASME Section XI Code that would need to be implemented. Therefore, the proposed change will result in an acceptable level of quality and safety.

5. Duration of Proposed Alternative

It is proposed to use the alternative for the remainder of the Third Inservice Inspection Interval for Indian Point Nuclear Generating Unit No. 3 (IP3).

ENCLOSURE 4 TO JPN-04-010 / NL-04-038 / ENO 2.04.028

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PILGRIM NUCLEAR POWER STATION

Request to Use 1998 Edition, 2000 Addenda of the ASME Section XI Code Requirements For the Examination of Reactor Vessel Closure Studs

> ENTERGY NUCLEAR OPERATIONS, INC. PILGRIM NUCLEAR POWER STATION DOCKET NO. 50-293 DPR-35

PILGRIM NUCLEAR POWER STATION THIRD 10-YEAR INSERVICE INSPECTION INTERVAL REQUEST NO. R-41

Proposed Use of Subsequent ASME Code Edition and Addenda In Accordance with 10CFR50.55a(g)(4)(iv)

1. ASME Code Component(s) Affected

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Code Class:	1
References:	IWB-2500, Table IWB-2500-1
Examination Category:	B-G-1
Item Number:	B6.30
Parts Examined:	Reactor Vessel Closure Studs (when removed)

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. Proposed Subsequent Code Edition and Addenda (or Portion)

Entergy proposes to use the 1998 Edition, 2000 Addenda of the ASME Section XI, Table IWB-2500-1, Category B-G-1 Item B6.30 (Reactor Vessel Closure Studs, when removed) requirements for the examination of Closure Studs, when removed. The 1998 Edition, up to the 2000 Addenda of the ASME Section XI Code has been incorporated by reference in 10 CFR 50.55a(b) (reference 2003 Code of Federal Regulations, 10CFR50.55a(b)(2), revised as of January 1, 2003).

4. <u>Related Requirements</u>

The changes to Table IWB-2500-1 for Category B-G-1, Item B6.30, Reactor Vessel Closure Studs (when removed) examination criteria does not affect other parts of the Code. There are no related requirements in the 1998 Edition, 2000 Addenda of the ASME Section XI Code that would need to be implemented. Therefore, the proposed change will result in an acceptable level of quality and safety.

5. <u>Duration of Proposed Alternative</u>

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