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F. G. Burford
Acting Director
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CNRO-2004-00078

December 7, 2004

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

SUBJECT: Supplement to Request No. CEP-IWE/IWL-001
Use of Subsequent ASME Code Edition and Addenda for Visual
Containment Examinations

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

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

Arkansas Nuclear One
Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6

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

Dear Sir or Madam:

By letter dated October 27, 2004, Entergy Operations, Inc. (Entergy) requested permission to use portions of the 1998 edition with 1999 and 2000 addenda of ASME Section XI for the conduct of visual containment examinations. Request CEP-IWE/IWL-001 applies to Arkansas Nuclear One Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford 3 Steam Electric Station. The request was based on recent guidance provided in Regulatory Information Summary 2004-12.

Entergy asked for approval of the request by January 15, 2005 in order to support the Arkansas Nuclear One, Unit 2 and Waterford Steam Electric Station Unit 3 outages scheduled for spring of 2005. During several phone calls it was determined that two clarifications would be necessary to assist the Staff in the approval process. The Enclosure provides those clarifications.

Should you have any questions regarding this submittal, please contact Bill Brice at (601) 368-5076.

This letter contains no commitments.

Very truly yours,

FGB/WBB/bal

Enclosure: Supplement to Request No. CEP-IWE/IWL-001

cc: (see next page)

A047

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ENCLOSURE

CNRO-2004-00078

CEP-IWE/IWL-001

Supplement to 10 CFR 50.55a Request Number CEP-IWE/IWL-001

The following provides clarification to items discussed on the phone call of November 23, 2004.

The table in section 3 of the previously submitted request (letter from F. G. Burford to the USNRC dated October 27, 2004), contains primary paragraphs and all related requirements necessary to implement the primary paragraphs. Section 4 of the submittal indicates the modifications and limitations required by 10 CFR 50.55a to implement the paragraphs requested.

This request is limited to portions of the later edition and addenda of code as approved by 10 CFR 50.55a with applicable modifications and limitations set forth in 10 CFR 50.55a. Existing requests for relief or alternatives applicable to the Containment Inservice Inspection Programs are limited to the 1992 code with 1992 addenda and will not be used for the portions of the later edition and addenda of code submitted in this request.

Examples follow:

1. Existing relief requests regarding minimum illumination requirements for concrete examinations will not be required for inspections conducted under the later edition and addenda of the code since the provisions of the relief are nearly identical to the newer code provisions.
2. Since Category E-D (seals, gaskets, and moisture barriers) will continue to be examined under the provisions of the 1992 code with 1992 addenda, approved alternatives to seals and gasket inspections are not impacted by this request and will continue to be performed as is.

In the event requests for relief or alternative are required for the later portions of the code, Entergy will submit these requests separately.