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F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2005-00043

August 4, 2005

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

SUBJECT: Request IST-2005-1
Use of Subsequent ASME OM Code Edition and Addenda for Condition
Monitoring of Check Valves

| | |
|-------------------------------------|----------------------------|
| Arkansas Nuclear One, Units 1 and 2 | Grand Gulf Nuclear Station |
| Docket No. 50-313 and 50-368 | Docket No. 50-416 |
| License No. DPR-51 and NPF-6 | License No. NPF-29 |

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|--|--------------------|
| Waterford Steam Electric Station, Unit 3 | River Bend Station |
| Docket No. 50-382 | Docket No. 50-458 |
| License No. NPF-38 | License No. NPF-47 |

REFERENCE: Entergy Operations, Inc. letter CNRO-2005-00029 to the NRC dated
June 3, 2005

Dear Sir or Madam:

In the referenced letter, Entergy Operations, Inc. (Entergy) submitted Request IST-2005-1, which requested permission to use Paragraph ISTC-5222 of the ASME Operation and Maintenance (OM) Code 2001 Edition through the 2003 Addenda at Arkansas Nuclear One - Units 1 (ANO-1) and 2 (ANO-2), Grand Gulf Nuclear Station (GGNS), River Bend Station (RBS), and Waterford Steam Electric Station, Unit 3 (Waterford 3). Paragraph ISTC-5222 provides requirements for monitoring check valves using a condition monitoring program.

In telephone calls with the NRC staff on June 8, 2005 and August 4, 2005 to discuss IST-2005-1, the staff asked Entergy to:

1. Request approval for use of Subsection ISTC for the conduct of check valve testing,
2. Confirm that all check valves scoped within the Inservice Testing (IST) program would be bi-directionally tested, and
3. Describe the plan to achieve 100% implementation of bi-directional testing for valves currently uni-directionally tested.

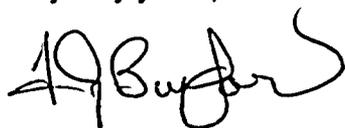
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Entergy has revised IST-2005-1 to incorporate the requested information. The revised IST-2005-1 is provided in Enclosure 1 to this letter. This version of IST-2005-1 replaces the previous version in its entirety. In order to support approval of this request for the upcoming refueling outage at Grand Gulf Nuclear Station, Entergy withdraws IST-2005-1 for ANO-1, ANO-2, RBS, and Waterford 3. The enclosed request applies to GGNS only.

Should you have any questions regarding this submittal, please contact Guy Davant at (601) 368-5756.

This letter contains four commitments as identified in Enclosure 2.

Very truly yours,



FGB/GHD/ghd

Enclosures 1. Request IST-2005-1
2. Licensee-Identified Commitments

| | | |
|-----|-------------------------------------|--|
| cc: | Mr. W. A. Eaton (ECH) | NRC Senior Resident Inspector |
| | Mr. J. P. DeRoy (ECH) | Arkansas Nuclear One |
| | Mr. J. S. Forbes (ANO) | P. O. Box 310 |
| | Mr. P. D. Hinnenkamp (RBS) | London, AR 72847 |
| | Mr. J. E. Venable (W3) | |
| | Mr. G. A. Williams (GG) | NRC Senior Resident Inspector |
| | | Grand Gulf Nuclear Station |
| | Dr. Bruce S. Mallett | Route 2, Box 399 |
| | Regional Administrator, Region IV | Port Gibson, MS 39150 |
| | U. S. Nuclear Regulatory Commission | |
| | 611 Ryan Plaza Drive, Suite 400 | NRC Senior Resident Inspector |
| | Arlington, TX 76011-8064 | River Bend Station |
| | | P. O. Box 1050 |
| | Mr. M. C. Thadani (ANO-1) | St. Francisville, LA 70775 |
| | Mr. D. G. Holland (ANO-2) | |
| | Mr. B. K. Vaidya (GGNS) | NRC Senior Resident Inspector |
| | Mr. M. K. Webb (RBS) | Waterford Steam Electric Station, Unit 3 |
| | Mr. N. Kalyanam (W3) | P. O. Box 822 |
| | U. S. Nuclear Regulatory Commission | Killona, LA 70066-0751 |
| | MS O-7D1 | |
| | Washington, DC 20555-0001 | |

ENCLOSURE 1

CNRO-2005-00043

REQUEST IST-2005-1

**Request in Accordance with
10 CFR 50.55a(f)(4)(iv) for IST Items**

ENTERGY OPERATIONS, INC.

10 CFR 50.55a Request IST-2005-1

**Request in Accordance with
10 CFR 50.55a(f)(4)(iv) for IST Items**

1. ASME Code Components Affected

All check valves within the Inservice Testing (IST) program.

2. Applicable Code Edition and Addenda

Currently, Grand Gulf Nuclear Station (GGNS) is committed to ASME/ANSI OM-10a, 1988 Edition. The next 120-month interval starts December 2007.

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

Pursuant to 10 CFR 50.55a(f)(4)(iv), Entergy Operations, Inc. (Entergy) requests permission to use Subsection ISTC of the 2001 Edition with 2003 Addenda of ASME Operation and Maintenance (OM) Code for the conduct of check valve testing at GGNS.

4. Related Requirements

There are no related requirements. The NRC approved the use of Appendix II condition monitoring program requirements specified in the 2001 Edition and 2003 Addenda with no limitations or modifications as documented in 10 CFR 50.55a(b)(3)(iv). In Federal Register 69 FR 58814, the NRC stated in part:

"The modifications in (b)(3)(iv) does not apply to the 2003 Addenda of the ASME OM Code because the earlier Code provisions on which this regulation was based were revised in the 2003 Addenda of the ASME OM Code to address the underlying issues which led to the NRC to impose the modification. The check valve monitoring program requirements in Appendix II of the 2003 Addenda of the ASME OM Code are equivalent to the check valve monitoring program requirements in § 50.55a(b)(3)(iv)."

Unlike earlier editions and addenda of the OM Code, the 2003 Addenda of the 2001 Edition contains the modifications imposed by the NRC for those earlier editions and addenda. Included in these requirements is bi-directional testing of check valves. By adopting this edition and addenda of the OM Code, Entergy will comply with these requirements.

5. Duration of Proposed Request

Entergy plans to begin implementing the Appendix II condition monitoring program upon approval of this request. Entergy has identified 72 Class 1, 2, and 3 check valves that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, 39 are scheduled to be tested during outages. Entergy will begin incorporating these 39 check valves into the Appendix II condition monitoring program upon approval of this request. By completion of the fall 2005 refueling outage, these valves will meet the Appendix II or ISTC requirements for bi-directional testing.

The remaining 33 valves that are uni-directionally tested in accordance with the IST Plan are currently tested on-line. By March 30, 2006, these valves will meet the Appendix II or ISTC requirements for bi-directional testing except as follows:

Entergy will make a good-faith effort to meet the requirements for bi-directional testing by March 30, 2006. Efforts to develop test methods for these 33 valves will not begin until after the fall 2005 refueling outage. If Entergy determines that bi-directional testing is only possible during an outage, Entergy will perform such testing during the spring 2007 refueling outage.

For those Class 1, 2, and 3 check valves currently required to be bi-directionally tested in accordance with the IST Plan, Entergy will continue to bi-directionally test these valves. Entergy will apply the requirements of Subsection ISTC to these valves by December 1, 2007.

ENCLOSURE 2

CNRO-2005-00043

LICENSEE-IDENTIFIED COMMITMENTS

LICENSEE-IDENTIFIED COMMITMENTS

| COMMITMENT | TYPE (Check one) | | SCHEDULED COMPLETION DATE |
|---|---------------------|--------------------------|--|
| | ONE-TIME ACTION | CONTINUING COMPLIANCE | |
| <p>1. Entergy has identified 72 Class 1, 2, and 3 check valves that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, 39 are scheduled to be tested during outages. Entergy will begin incorporating these 39 check valves into the Appendix II condition monitoring program upon approval of this request. By completion of the fall 2005 refueling outage, these valves will meet the Appendix II or ISTC requirements for bi-directional testing.</p> | ✓ | | End of the fall 2005 refueling outage (RF14) |
| <p>2. The remaining 33 valves that are uni-directionally tested in accordance with the IST Plan are currently tested on-line. By March 30, 2006, these valves will meet the Appendix II or ISTC requirements for bi-directional testing except as follows:</p> <p>Entergy will make a good-faith effort to meet the requirements for bi-directional testing by March 30, 2006. Efforts to develop test methods for these 33 valves will not begin until after the fall 2005 refueling outage. If Entergy determines that bi-directional testing is only possible during an outage, Entergy will perform such testing during the spring 2007 refueling outage.</p> | ✓ | | March 30, 2006 or End of the spring 2007 refueling outage (RF15) |
| <p>3. For those Class 1, 2, and 3 check valves currently required to be bi-directionally tested in accordance with the IST Plan, Entergy will continue to bi-directionally test these valves.</p> | | ✓ | |
| <p>4. Entergy will apply the requirements of Subsection ISTC to these valves (see item 3, above) by December 1, 2007.</p> | ✓ | | 12/1/2007 |