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F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2005-00051

December 6, 2005

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

SUBJECT: Request IST-2005-2
Use of Subsequent ASME OM Code Edition and Addenda for
Exercising Manual Valves

Arkansas Nuclear One, Units 1 and 2
Docket No. 50-313 and 50-368
License No. DPR-51 and NPF-6

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

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

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

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(f)(4)(iv), Entergy Operations, Inc. (Entergy) requests permission to use Paragraph ISTC-3540 of the ASME Operation and Maintenance (OM) Code 2001 Edition through the 2003 Addenda at Arkansas Nuclear One - Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford Steam Electric Station, Unit 3. Paragraph ISTC-3450 provides requirements for exercising manual valves. Request IST-2005-2 is provided in the enclosure.

Entergy is providing Request IST-2005-2 in accordance with NRC Regulatory Issue Summary 2004-12, *Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI*. This request is based on the guidance provided in NUREG-1482, Rev. 1, *Guidelines for Inservice Testing at Nuclear Power Plants*.

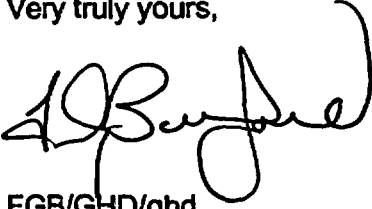
Entergy requests approval of Request IST-2005-2 by May 10, 2006 to support valve exercising activities scheduled at Grand Gulf Nuclear Station.

This letter contains no commitments.

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

Very truly yours,



FGB/GHD/ghd

Enclosure: Request IST-2005-2

cc: Mr. W. A. Eaton (ECH)
Mr. J. P. DeRoy (ECH)
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ENCLOSURE

CNRO-2005-00051

REQUEST IST-2005-2

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

ENTERGY OPERATIONS, INC.

10 CFR 50.55a Request IST-2005-2

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

1. ASME Code Components Affected

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

2. Applicable Code Edition and Addenda

Currently, Arkansas Nuclear One - Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford Steam Electric Station, Unit 3 are committed to ASME/ANSI OM-10a, 1988 Edition.

The next 120-month interval for Arkansas Nuclear One - Unit 1, Grand Gulf Nuclear Station, River Bend Station, and Waterford Steam Electric Station, Unit 3 starts December 2007. The next 120-month interval for Arkansas Nuclear One - Unit 2 starts December 2009.

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 exercising manual valves at Arkansas Nuclear One - Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford Steam Electric Station, Unit 3.

4. Related Requirements

The exercise interval for manual valves is stated in 10 CFR 50.55a (b)(3)(vi), which modifies Subsection ISTC-3540 as follows:

"Manual valves must be exercised on a 2-year interval rather than the 5-year interval specified in paragraph ISTC-3540 of the 1999 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(3) of this section, provided that adverse conditions do not require more frequent testing."

By adopting the 2001 Edition with the 2003 Addenda of the OM Code, Entergy recognizes this regulatory requirement is a condition of this request.

5. Duration of Proposed Request

Entergy plans to implement this request upon approval by the NRC. The approved request will remain in each site's IST program until the beginning of the next interval as identified in Section 2, above.