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RBG-46517

Rick J. King
Director, Nuclear Safety Assurance

January 17, 2006

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

SUBJECT: Supplement to Amendment Request
One Time Extension to the Integrated Leak Rate Test Interval
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

- REFERENCES:**
1. Entergy letter dated March 8, 2005, License Amendment Request 2005-01, One-time Extension of the Integrated Leak Rate Test Interval, River Bend Station, Unit 1 (RBG-46404)
 2. Entergy letter dated May 14, 2002, License Amendment Request 2002-16, One-time Extension of the Integrated Leak Rate Test Interval" (RBG-45952)
 3. Entergy letter dated December 20, 2002, Response to Request for Additional Information for One-time Extension of the ILRT Interval, License Amendment Request 2002-16 (RBG-46037)

Dear Sir or Madam:

Entergy Operations, Inc. (Entergy), in Reference 1, proposed a change to the River Bend Station, Unit 1 (RBS) Technical Specifications (TSs) to allow a one-time extension of the Integrated Leak Rate Test interval for 4 months.

On January 6, 2006, Entergy and members of your staff held a call to discuss differences between the previous similar request (References 2 and 3) and the current RBS Inservice Inspection (ISI) program to determine any changes in the program and to update certain test results. As a result of the call, NRC staff requested confirmation of the information discussed. Entergy's response is contained in Attachment 1.

There are no technical changes proposed. The original no significant hazards consideration included in Reference 1 is not affected by any information contained in the supplemental letter. There are no new commitments contained in this letter.

If you have any questions or require additional information, please contact Bill Brice at 601-368-5076

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I declare under penalty of perjury that the foregoing is true and correct. Executed on January 17, 2006.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil J. King". The signature is fluid and cursive, with the first name "Phil" being the most prominent.

RJK/WBB

Attachment:

1. Response to Request For Additional Information

cc: Dr. Bruce S. Mallett
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Senior Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

U.S. Nuclear Regulatory Commission
Attn: Mr. Bhalchandra K. Vaidya MS O-7D1
Washington, DC 20555-0001

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Attn: Mr. Ronnie Wascom
Surveillance Division
P. O. Box 4312
Baton Rouge, LA 70821-4312

Attachment 1

To

RBG-46517

Response to Request for Additional Information

Response to Request for Additional Information Related to One-time Extension of the Integrated Leak Rate Test for River Bend Station Unit 1 (TAC # MC6328)

- REFERENCES:
1. Entergy letter dated March 8, 2005, License Amendment Request 2005-01, One-time Extension of the Integrated Leak Rate Test Interval, River Bend Station, Unit 1 (RBG-46404)
 2. Entergy letter dated May 14, 2002, License Amendment Request 2002-16, One-time Extension of the Integrated Leak Rate Test Interval" (RBG-45952)
 3. Entergy letter dated December 20, 2002, Response to Request for Additional Information for One-time Extension of the ILRT Interval, License Amendment Request 2002-16 (RBG-46037)
 4. Entergy letter dated October 27, 2004, Request No. CEP-IWE/IWL-001, Use of Subsequent ASME Code Edition and Addenda for Visual Containment Examinations
 5. NRC letter dated December 21, 2004, Use of Subsequent American Society of Mechanical Engineers Boiler and Pressure Vessel Code Editions and Addenda for Visual Containment Examinations

Background

On January 6, 2006, Entergy and members of your staff held a call to discuss differences between the programs described in the previous request (References 2 and 3) and the current RBS program, to determine any changes in the ISI program and to update certain test results. As a result of the call, Entergy provides the following summary of changes since the previous submittal in the following four areas:

1. Changes to the Screening Criteria used in the Containment ISI Program

Since the original submittal (Reference 2) dated May 14, 2002, and a related response to a request for additional information (Reference 3) dated December 20, 2002, the Containment ISI program has undergone routine update and maintenance as provided for in 10 CFR 50.55a. While the majority of these changes are below the level of detail provided in the earlier submittals, the following represent changes related to the information presented earlier:

General Visual inspections conducted to satisfy the requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (ASME), Subsection IWE are now performed in accordance with CEP-CII-003 instead of STP-057-3700. This is a corporate level procedure and provides for consistency with other Entergy plants. While this change was anticipated and discussed in one of the earlier submittals (Reference 3), it had not yet been implemented. The change to CEP-CII-003 resulted in some changes to the screening criteria used to determine the acceptability of surface area examinations performed under the ISI program. The changes made, match the anticipated criteria (derived from Waterford 3) listed in Reference 3 with the following exceptions:

- (a) Due to design differences in the thickness of the RBS containment vessel when compared to Waterford 3, the allowable thickness for pits, dents, and gouges was changed to 0.15 inches for the containment wall and dome and to 0.0375 inches for the suppression pool floor liner. These changes ensure that we allow no more than the 10% reduction in design wall thickness as allowed by ASME IWE.
- (b) Criteria used to evaluate coated surfaces for checking, cracking, flaking, and rusting were contained in the previous STP-057-3700. These criteria were retained in CEP-CII-003 for use at RBS. This is listed as a difference only because the additional information provided in Reference 3 did not include these criteria in the list of anticipated screening criteria.

2. Changes to the Containment ISI Program due to ASME Code Updates

As allowed under 10 CFR 50.55a, Entergy requested permission to use subsequent editions and addenda of ASME code for visual examinations of certain components under CEP-IWE/IWL-001 by Reference 4. The NRC approved this request by Reference 5. As a result, the RBS containment program now uses the 1998 Edition with 2000 Addenda of IWE for visual examination of containment surfaces (Category E-A and E-C components) along with the associated limitations provided for this Code year and Addenda by 10 CFR 50.55a. Other examinations continue to be performed in accordance with the Code of Record (1992 Edition with 1992 Addenda) as described in the earlier submittals. While details on the implementation of the subsequent Edition and Addenda of Code may be found in the request and associated SER, the following list provides an overview of the major changes made to the program as a result of adoption of the 1998 Edition with 2000 Addenda of Code for examination of vessel surfaces:

- (a) General visual examinations under IWE are now required to look at both sides of the containment vessel. While RBS has consistently chosen to look at both sides using IWE criteria, this was not a Code requirement until we adopted the 1998 Edition and 2000 Addenda for use with IWE inspections.
- (b) Single sided VT-3 inspection is no longer required for non-submerged areas of containment at the end of the interval.
- (c) Examination of surfaces prior to paint or coatings removal and after reapplication of coatings is no longer tracked as an IWE code inspection under the 1998 Edition and 2000 Addenda of IWE. Coatings examinations are conducted and tracked in accordance with the applicable industry standards and regulations pertaining to coatings.
- (d) VT-3 inspection of wetted surfaces once each interval continues to be required under the limitations provided by 10 CFR 50.55a for use of the 1998 Edition and 2000 Addenda of IWE.

3. Appendix J Required Testing

Since the original submittal, an additional Appendix J inspection of both containment surfaces was completed in the last refueling outage (RF-12, October, 2004) and no indications or problems were found.

Bellows Testing

Additional test data has been obtained during RF11 for KJB-Z19 (17.0 sccm) and KJB-Z20 (41 sccm). The results for these tests are consistent with the test results provided previously in Reference 3 and revealed no substantial degradation. These bellows are scheduled for next testing again in October 2007 (RF14).