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F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2006-00002

January 31, 2006

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

SUBJECT: Request IST-2006-1
Use of Subsequent ASME OM Code Edition and Addenda for Condition
Monitoring of Check Valves

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

REFERENCE: NRC Letter to Entergy Operations, Inc. dated August 31, 2005
(TAC No. MC7229)

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(f)(4)(iv), Entergy Operations, Inc. (Entergy) requests permission to use Paragraph ISTC-5222 of the ASME Operation and Maintenance (OM) Code, 2001 Edition through the 2003 Addenda at River Bend Station. Paragraph ISTC-5222 provides requirements for monitoring check valves using a condition monitoring program. Request IST-2006-1 is provided in the enclosure.

Entergy is providing Request IST-2006-1 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*.

The NRC staff approved an equivalent request for Grand Gulf Nuclear Station as documented in the referenced letter.

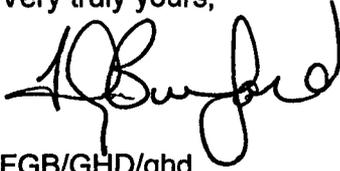
Entergy requests approval of Request IST-2006-1 by April 1, 2006 in order to support the upcoming spring refueling outage at River Bend Station.

This letter contains four commitments as identified in Enclosure 2.

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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

Enclosures: 1. Request IST-2006-1
2. Licensee-Identified Commitments

cc: Mr. W. A. Eaton (ECH)
Mr. J. P. DeRoy (ECH)
Mr. P. D. Hinnenkamp (RBS)

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Mr. B. K. Vaidya (RBS)
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NRC Senior Resident Inspector
River Bend Station
P. O. Box 1050
St. Francisville, LA 70775

ENCLOSURE 1

CNRO-2006-00002

REQUEST IST-2006-1

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

ENTERGY OPERATIONS, INC.

10 CFR 50.55a Request IST-2006-1

**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, River Bend Station (RBS) 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 RBS.

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 will begin implementing the Appendix II condition monitoring program upon approval of this request. Entergy has identified 580 Class 1, 2, and 3 check valves that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, 340 are scheduled to be tested during outages. Entergy will begin incorporating these 340 check valves into the Appendix II condition monitoring program upon approval

of this request. By completion of the spring 2006 refueling outage (RF13), these valves will meet the Appendix II or ISTC requirements for bi-directional testing.

The remaining 240 valves that are uni-directionally tested in accordance with the IST Plan are currently tested on-line. By the fall 2007 refueling outage (RF14), these valves will meet the Appendix II or ISTC requirements for bi-directional testing.

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-2006-00002

LICENSEE-IDENTIFIED COMMITMENTS

LICENSEE-IDENTIFIED COMMITMENTS

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
1. Entergy has identified 580 Class 1, 2, and 3 check valves that are currently required to be uni-directionally tested in accordance with the IST Plan. Of these, 340 are scheduled to be tested during outages. Entergy will begin incorporating these 340 check valves into the Appendix II condition monitoring program upon approval of this request. By completion of the spring 2006 refueling outage (RF13), these valves will meet the Appendix II or ISTC requirements for bi-directional testing.	✓		End of the spring 2006 refueling outage (RF13)
2. The remaining 240 valves that are uni-directionally tested in accordance with the IST Plan are currently tested on-line. By the fall 2007 refueling outage (RF14), these valves will meet the Appendix II or ISTC requirements for bi-directional testing.	✓		Prior to fall 2007 refueling outage (RF14)
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.		✓	
4. Entergy will apply the requirements of Subsection ISTC to these valves (see item 3, above) by December 1, 2007.	✓		12/1/2007