

April 5, 2006

Mr. Michael R. Kansler, President
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: PILGRIM NUCLEAR POWER STATION - RELIEF REQUEST NO.
PIL-05-R-002 (TAC NO. MC8300)

Dear Mr. Kansler:

By letter dated June 29, 2005, Entergy Nuclear Operations, Inc. (the licensee), proposed an alternative to use the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, 2001 Edition through the 2003 Addendum, in lieu of the 1998 Edition through the 2000 Addendum in regard to Subparagraph IWA-2210, "Visual Examinations," including subsections IWA-2211 through IWA-2216.

The Nuclear Regulatory Commission staff has concluded that authorizing the visual examination requirements in Subparagraph IWA-2210 and subsections IWA-2211 through IWA-2216 of the 2001 Edition through the 2003 Addendum, in lieu of the requirements in the 1998 Edition through the 2000 Addendum, will provide an acceptable level of quality and safety. The staff's analysis is provided in the enclosed safety evaluation. Pursuant to 10 CFR 50.55a(a)(3)(I), the proposed alternative is authorized for the Pilgrim Nuclear Power Station's fourth 10-year inservice inspection interval, which ends on June 30, 2015.

If you have any questions regarding this approval, please contact the Pilgrim Project Manager, James Shea, at 301-415-1388.

Sincerely,

/RA/

Richard J. Laufer, Chief
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosure:
As stated
cc w/encl: See next page

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Pilgrim Nuclear Power Station

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUEST NO. PIL-05-R-002

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

By letter dated June 29, 2005, Agencywide Documents Access and Management System (accession number ML051920157), Entergy Nuclear Operations, Inc, (the licensee) submitted Relief Request No. PIL-05-R-002, related to the fourth 10-year interval inservice inspection (ISI) Program for the Pilgrim Nuclear Power Station (Pilgrim). The licensee proposed an alternative to use the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, 2001 Edition through the 2003 Addendum, in lieu of the 1998 Edition through the 2000 Addendum in regard to Subparagraph IWA-2210, "Visual Examinations," including subsections IWA-2211 through IWA-2216. The licensee's proposed use of portions of subsequent edition and addenda to the ASME Code, Section XI, which is incorporated by reference in 10 CFR 50.55a(b)(2), is in accordance with 10 CFR 50.55a(g)(4)(iv). Therefore, the Nuclear Regulatory Commission (NRC) staff's review has focused on whether the related requirements of the respective Codes and addenda are being met. The licensee's request would be applicable during Pilgrim's fourth 10-year ISI interval, which ends on June 30, 2015.

2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(g), requires that the ISI of ASME Code Class 1, 2, and 3 components be performed in accordance with Section XI of the ASME Code and applicable addenda, except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). According to 10 CFR 50.55a(a)(3), alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if an applicant demonstrates that the proposed alternatives would provide an acceptable level of quality and safety or if the specified requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection (ISI) of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that the ISI of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and

modifications listed therein. The ISI Code of record for the fourth 10-year inspection interval for Pilgrim Station is the 1998 Edition through the 2000 Addendum of the ASME Code, Section XI. Pursuant to 10 CFR 50.55a(g)(4)(iv), inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to NRC approval. Portions of editions and addenda may be used, provided that all related requirements of the respective editions or addenda are met.

Regulatory Issue Summary 2004-16, "Use of Later Editions and Addenda to ASME Code Section XI for Repair/Replacement Activities," provides additional information regarding the use of editions and addenda of the ASME Code subsequent to the Code of Record.

2.1 Code Requirements for which Relief is Requested

Pursuant to 10 CFR 50.55a(g)(4)(iv), the licensee has proposed an alternative to use the visual examination requirements of Subparagraph IWA-2210, including subsections IWA-2211 through IWA-2216 of the ASME Code, Section XI, 2001 Edition through the 2003 Addendum. The request is applicable to all components subject to VT-1, VT-2, or VT-3 visual examinations of the ASME Code, Section XI.

2.2 ASME Code Requirements

The Code requirements that would otherwise apply are as stated in IWA-2210, IWA-2211 through IWA-2216 of the ASME Code, Section XI, 1998 Edition through the 2000 Addendum.

2.3 Licensee's Basis for Requesting Relief

The changes to ASME Code, Section XI, Paragraph IWA-2200, including Subparagraph IWA-2210 and subsections IWA-2211 through IWA-2216 on visual examinations for Class 1, 2, and 3 items, do not affect other parts of the Code. The 2001 Edition through the 2003 Addendum of the ASME Code, Section XI, provides clarifications as to the requirements of visual examinations to be performed on Class 1, 2, and 3 components during inservice examinations. This requirement would also be followed under the Pilgrim Repair/Replacement Program.

3.0 TECHNICAL EVALUATION

The licensee's proposed use of portions of subsequent edition and addenda to the ASME Code, Section XI, which is incorporated by reference in 10 CFR 50.55a(b)(2), is in accordance with 10 CFR 50.55a(g)(4)(iv). Therefore, the NRC staff's review has focused on whether the related requirements of the respective Codes and addenda are being met. The staff has reviewed Subparagraph IWA-2210 and subsections IWA-2211 through IWA-2216 pertaining to visual examinations in both versions of the ASME Code, Section XI; the 1998 Edition through the 2000 Addendum and the 2001 Edition through the 2003 Addendum. The staff believes that the later Code, including the Addendum, has the same requirement as that of the previous version except that it provides clarification concerning illumination during visual examinations. There is thus no new requirement in regard to visual examinations in either version of the Code that has to be met as a result of the Code upgrade in this area. The NRC staff, therefore, has

determined that the use of the ASME Code, Section XI, 2001 Edition through the 2003 Addendum in lieu of the 1998 Edition through the 2000 Addendum, will provide an acceptable level of quality and safety.

4.0 CONCLUSION

Based on the NRC staff's review and comparison of the ASME Codes, Section XI (1998 and 2001 Editions), the staff finds that use of the visual examination requirements in Subparagraph IWA-2210 and subsections IWA-2211 through IWA-2216 of the 2001 Edition through the 2003 Addendum, in lieu of the requirements in the 1998 Edition through the 2000 Addendum, will provide an acceptable level of quality and safety. The staff authorizes the alternative proposed in Relief Request No. PIL-05-R-002 pursuant to 10 CFR 50.55a(a)(3)(I), for the fourth 10-year ISI interval for Pilgrim. All other ASME Code, Section XI, requirements for which relief was not specifically requested and approved in this relief request remain applicable, including third party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: P. Patnaik

Date: April 5, 2006