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F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2006-00015

March 10, 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: Entergy Operations, Inc. letter CNRO-2006-00002 to the NRC dated
January 31, 2006

Dear Sir or Madam:

In the referenced letter, Entergy Operations, Inc. (Entergy) submitted Request IST-2006-1, which requested permission to use Paragraph ISTC-5222 of the ASME Operation and Maintenance (OM) Code 2001 Edition through the 2003 Addenda at River Bend Station (RBS). Paragraph ISTC-5222 provides requirements for monitoring check valves using a condition monitoring program.

In recent telephone calls with the NRC staff to discuss IST-2006-1, the staff asked Entergy to describe the plan to achieve 100% implementation of bi-directional testing for valves currently uni-directionally tested.

Entergy has revised IST-2006-1 to incorporate the requested information. The revised IST-2006-1 is provided in Enclosure 1 to this letter. This version of IST-2006-1 replaces the previous version in its entirety.

Entergy requests that the NRC staff approve IST-2006-1 by April 10, 2006. Should you have any questions regarding this submittal, please contact Guy Davant at (601) 368-5756.

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This letter contains five commitments as identified in Enclosure 2. These commitments supersede those made in the referenced letter.

Very truly yours,



FGB/GHD/ghd

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

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

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U. S. Nuclear Regulatory Commission
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Mr. B. K. Vaidya (RBS)
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NRC Senior Resident Inspector
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ENCLOSURE 1

CNRO-2006-00015

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, 339 are scheduled to be tested during outages. Entergy will begin incorporating these 339 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 241 valves that are uni-directionally tested in accordance with the IST Plan are currently tested on-line. Entergy plans to test these valves during appropriate maintenance (division or system) outages. Provided in the table below is the current schedule for these outages. The scheduled dates are subject to change based on plant configuration and operational requirements.

Scheduled Start Date	Maintenance Outage
12/4/2006	Division III
1/29/2007	Division II
3/12/2007	Division I
5/28/2007	Reactor Core Isolation Cooling (RCIC) system

The remaining 241 valves will be scheduled for testing such that adequate time is available to perform the required tests. By June 9, 2007, the 241 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 June 9, 2007. Efforts to develop test methods for these remaining valves will not begin until after the spring 2006 refueling outage. If during test development Entergy determines that bi-directional testing is only possible during a refueling outage, Entergy will perform such testing during the fall 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-2006-00015

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, 339 are scheduled to be tested during outages. Entergy will begin incorporating these 339 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 spring 2006 refueling outage (RF13)
2. The remaining 241 valves will be scheduled for testing such that adequate time is available to perform the required tests. By June 9, 2007, the 241 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 June 9, 2007. Efforts to develop test methods for these remaining valves will not begin until after the spring 2006 refueling outage.	✓		6/9/2007
3. If during test development (see item 2, above) Entergy determines that bi-directional testing is only possible during a refueling outage, Entergy will perform such testing during the fall 2007 refueling outage.	✓		End of the fall 2007 refueling outage
4. 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.		✓	
5. Entergy will apply the requirements of Subsection ISTC to these valves (see item 4, above) by December 1, 2007.	✓		12/1/2007