



Entergy Nuclear Operations, Inc.
Pilgrim Station
600 Rocky Hill Road
Plymouth, MA 02360

Stephen J. Bethay
Director, Nuclear Assessment

June 6, 2006

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

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293, License No. DPR-35

Request For Use of ASME Code Case N-623 and Withdrawal of Pilgrim
Relief Request No. PRR- 12 (TAC No. MC 8295)

- REFERENCES:
1. Entergy Letter No. 2.05.045, ASME Section XI Fourth Interval Inservice Inspection Program Plan and the Associated Relief Requests for NRC Approval, PNPS-RPT-05-001, Revision 0, dated June 29, 2005
 2. ASME Code Case N-623, "Deferral of Inspections of Shell-to-Flange and Head-to-Flange Welds of a Reactor Vessel Section XI, Division 1, dated February 26, 1999
 3. U.S. NRC Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1", Revision 13 (January 2004) and Revision 14 (August 2005)

LETTER NO. 2.06.033

Dear Sir or Madam:

By Reference 1, Entergy submitted Pilgrim Relief Request (PRR) No. 12 for NRC review and approval for the 4th ISI interval that began on July 1, 2005. The relief requested included provisions that were incorporated in ASME Code Case N-623. This code case is acceptable for use as stated in NRC approved Regulatory Guide 1.147, Revisions 13 and 14. It has subsequently been annulled since its provisions were incorporated into the 2001/2003 version of the ASME Code Section XI, Division 1.

Regulatory Guide 1.147, Revision 13, which lists Code Case N-623 as acceptable for use was the approved Guide in place at the time Entergy submitted the Pilgrim ISI program and associated PRR-12 for NRC review and approval in June 2005 (Ref. 1). The use of Code Case N-623 is referenced on page 1-25 of Reference 1.

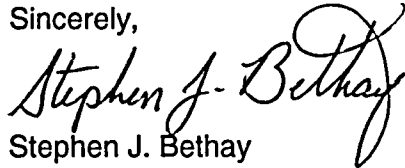
Since Code Case N-623 was acceptable for use at the time Reference 1 was submitted, Entergy withdraws PRR-12 and will continue to use the ASME Code Case N-623 for the 4th ISI interval as an acceptable alternative pursuant to 10 CFR 50.55a(a)(3)(i). It was authorized in R.G. 1.147, Revision 13 pursuant to 10 CFR 50.55a (a)(3) and stipulated in 10 CFR 50.55a. This use of ASME Code N-623 is consistent with the NRC guidance cited in the third paragraph (page 3) of R. G. 1.147, Rev. 14.

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There are no commitments contained in this letter.

If you have any questions on this transmittal, please contact Mr. Bryan Ford, Licensing Manager at 508-830-8403.

Sincerely,

A handwritten signature in black ink, reading "Stephen J. Bethay". The signature is fluid and cursive, with the first name "Stephen" and last name "Bethay" clearly legible.

Stephen J. Bethay

SJB/wgl

cc: Mr. James Shea, Project Manager
Office of Nuclear Reactor Regulation
Mail Stop: 0-8B-1
U.S. Nuclear Regulatory Commission
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

Senior Resident Inspector
Pilgrim Nuclear Power Station