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F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2006-00038

August 2, 2006

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

SUBJECT: Request ISI-2006-1
Use of Later ASME Section XI Code Edition and Addenda for
Qualification of Thermal Removal Processes in Accordance With
IWA-4461.4

Arkansas Nuclear One, Units 1 and 2
Docket No. 50-313 and 50-368
License No. DPR-51 and NPF-6

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(g)(4)(iv), Entergy Operations, Inc. (Entergy) requests permission to use IWA-4461.4 of the 1995 Edition, 1997 Addenda of ASME Section XI. IWA-4461.4 provides rules for qualification of thermal removal processes as an alternative to mechanical processing of thermally cut surfaces. This request is applicable to Arkansas Nuclear One - Units 1 (ANO-1) and 2 (ANO-2). This request (ISI-2006-1) is provided in the enclosure to this letter. The NRC has approved this edition and addenda of Section XI as documented in 10 CFR 50.55a(b)(2).

Entergy is providing this request in accordance with NRC Regulatory Issue Summary 2004-16, *Use of Later Editions and Addenda to ASME Code Section XI for Repair/Replacement Activities*.

Entergy requests approval of this request on or before April 1, 2007. Should you have any questions regarding this submittal, please contact Guy Davant at (601) 368-5756.

This letter contains no commitments.

Very truly yours,

A handwritten signature in black ink, appearing to read "F. G. Burford".

FGB/GHD/ghd

Enclosure: Request ISI-2006-1

A047

cc: Mr. W. A. Eaton (ECH)
Mr. J. S. Forbes (ANO)

Dr. Bruce S. Mallett
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ENCLOSURE

CNRO-2006-00038

ISI-2006-1

**REQUEST IN ACCORDANCE WITH
10 CFR 50.55a(g)(4)(iv) FOR INSERVICE INSPECTION ITEMS**

ENTERGY OPERATIONS, INC.

10 CFR 50.55a Request ISI-2006-1

**REQUEST IN ACCORDANCE WITH
10 CFR 50.55a(g)(4)(iv) FOR INSERVICE INSPECTION ITEMS**

1. ASME Code Components Affected

All Class 1, 2, and 3 vessels, piping, pumps, and valves in the Section XI pressure boundary at Arkansas Nuclear One, Units 1 (ANO-1) and 2 (ANO-2).

2. Applicable Code Edition and Addenda

Repair/replacement activities at ANO-1 and ANO-2 are currently performed in accordance with the 1992 Edition of ASME Section XI with portions of the 1993 Addenda for pressure testing.

The start date of the next 120-month inservice inspection interval for ANO-1 and ANO-2 is June 1, 2007 and March 26, 2010, respectively.

3. Proposed Subsequent Code Edition and Addenda (or Portion)

A. Background

As stated in Section 2.0, above, Entergy currently performs repair/replacement activities in accordance with the 1992 Edition of ASME Section XI with portions of the 1993 Addenda for pressure testing. However, IWA-4000 in the 1992 Edition does not contain rules for qualifying thermal removal processes, such as electrodischarge machining (EDM), that can be used without mechanical processing of thermally cut surfaces.

The 1997 Addenda of the 1995 Edition of Section XI revised the rules applicable to thermal removal processes for all repair/replacement activities. The 1997 Addenda also added new rules that exempted mechanical processing of thermally cut surfaces provided the thermal removal process was qualified in accordance with IWA-4461.4.

B. Proposed Subsequent Code Edition and Addenda

Pursuant to 10 CFR 50.55a(g)(4)(iv), Entergy requests permission to use IWA-4461.4 in the 1995 Edition, 1997 Addenda of ASME Section XI. This section of the Code provides rules for qualifying thermal removal processes as an alternative to mechanical processing of thermally cut surfaces of P-Nos. 3, 4, 5, 6, 7, 8, 9, 10, 11A, and 43 materials.

The NRC approved the use of the 1995 Edition, 1997 Addenda as documented in 10 CFR 50.55a(b)(2) with no limitations, conditions, or modifications on IWA-4461.4.

4. Related Requirements

IWA-4461.4 of the 1995 Edition, 1997 Addenda specifies rules for qualification of a thermal removal process as an alternative to mechanical processing of thermally cut surfaces. When applying IWA-4461.4, the following related requirement also applies:

- IWA-4461.4 states: "Mechanical processing of thermally cut surfaces for materials identified in IWA-4461.2 and IWA-4461.3 is not required when using a thermal removal process qualified as follows..." Because IWA-4461.4 is an alternative to mechanical processing of thermally cut surfaces for the materials identified in IWA-4461.2 and IWA-4461.3, it is only applicable to P-Number 3, 4, 5, 6, 7, 8, 9, 10, 11A, and 43 materials; it cannot be applied to P-Number 1 materials of IWA-4461.1.

Therefore, when invoking IWA-4461.4 in the 1995 Edition 1997 Addenda, Entergy will also apply this related requirement.

The NRC prohibition on "evaluation of thermally cut surfaces" in paragraph (xxiii) of 10 CFR50.55a(b)(2) does not apply to the qualification alternative of IWA-4461.4. Rather, this NRC prohibition applies to IWA-4461.4.2, *Evaluation of Thermally Cut Surfaces*, which was not included into ASME Section XI until the 2001 Edition.

5. Duration of Proposed Request

The duration of this request will be from approval by the NRC staff until the beginning of the next interval for each facility, as identified in Section 2, above.