



Entergy Nuclear Northeast
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Patric W. Conroy
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October 20, 2006

Re: Indian Point Unit 3
Docket No. 50-286
NL-06-105

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

Subject: **Request 3-42(A) to Use a Later Edition and Addenda of the ASME Section XI Code for the Repair/Replacement Program in Accordance with 10 CFR 50.55a(g)(4)(iv)**

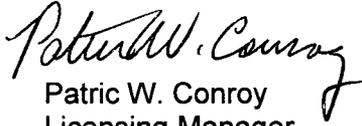
Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(g)(4)(iv), and in accordance with the guidance provided in NRC Regulatory Issue Summary (RIS) 2004-16, dated October 19, 2004, Entergy Nuclear Operations, Inc. (Entergy) requests permission to use the 2001 Edition of ASME Code, Section XI, 2003 Addenda and the related Code requirements (IWA-4000) when performing Section XI repair/replacement activities following the Indian Point Unit 3 refueling outage (3R14) or approval by the NRC staff, which ever is later, for the remainder of the 10-year ISI interval at Indian Point Unit 3. This request (3-42(A)) is provided in the enclosure to this letter.

Entergy requests approval of this request by March 30, 2007. If you have any questions regarding this matter, please contact Mr. Patric W. Conroy, Licensing Manager at (914) 734-6668.

There are no new commitments being made in this submittal.

Sincerely,


Patric W. Conroy
Licensing Manager
Indian Point Energy Center

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Enclosure One: Request 3-42(A)

cc: Mr. Samuel J. Collins, Regional Administrator, NRC Region I
Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Paul Eddy, New York State Dept. of Public Service
NRC Resident Inspector, IP3

ENCLOSURE ONE TO NL-06-105

Request 3-42(A)

**Request in Accordance with
10 CFR 50.55a(g)(4)(iv) for Inservice Inspection Items**

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286**

ENTERGY NUCLEAR NORTHEAST

10 CFR 50.55a Request 3-42(A)

**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 Indian Point Unit 3.

Class MC and CC containment metallic liner and concrete within the Section XI boundary at Indian Point 3.

2. Applicable Code Edition and Addenda

Repair/replacement activities at Indian Point 3 are currently performed in accordance with the 1989 Edition, No Addenda, of ASME Section XI Code for Class 1, 2, and 3 systems and components, with Class MC and CC activities performed in accordance with Articles IWE & IWL of the 1998 Edition, No Addenda, of ASME Section XI Code.

Indian Point 3 is in the third inservice inspection (ISI) interval which ends on July 21, 2009.

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

A. Background

As stated in Section 2.0, above, Entergy's Indian Point 3 currently performs repair/replacement activities in accordance with the 1989 Edition, No Addenda, of ASME Section XI for Class 1, 2, and 3 systems and components, with Class MC and CC activities performed in accordance with Articles IWE & IWL of the 1998 Edition, No Addenda, of ASME Section XI Code.

B. Proposed Subsequent Code Edition and Addenda

Pursuant to 10 CFR 50.55a(g)(4)(iv), Entergy requests permission to use the 2001 Edition/ 2003 Addenda for repair/replacement activities in accordance with IWA-4000 for Indian Point 3.

The use of the 2001 Edition/2003 Addenda for repair/replacement activities at Indian Point 3 will standardize the Repair/Replacement program for the Indian Point site.

There are significant differences between the 1989 edition and the 2001 Edition/2003 Addenda in the repair/replacement rules. The use of the same rules for both Indian Point 2 and Indian Point 3 will eliminate the potential for errors resulting in the use of different rules at each unit.

The next Indian Point 3 refueling outage (3R14) begins in March of 2007. Since a significant number of work packages have already been planned for 3R14, repair and replacement activities will be performed in accordance with the requirements of the 1989 Edition, No Addenda, of ASME Section XI for work packages associated with 3R14. For repair/replacement activities following 3R14 the requirements of the 1989 Edition, No Addenda, of ASME Section XI will continue to be followed until NRC approval of the use of the ASME Section XI, 2001 Edition/2003 Addenda. The use of the ASME Section XI 2001 Edition/2003 Addenda will provide the same level of quality and safety as is currently being applied to repairs and replacements performed under the 1989 Edition.

4. Related Requirements

The NRC approved the use of the 2001 Edition/2003 Addenda as documented in 10 CFR 50.55a(b)(2) with limitations, conditions, or modifications affecting IWA-4000 as follows:

- 10 CFR 50.55a(b)(2)(xii)- IWA-4660- Underwater welding is not approved for use on irradiated material.
- 10 CFR 50.55a(b)(2)(xiii)- Mechanical clamping devices may utilize code case N-523-1 provided all provisions are applied.
- 10 CFR 50.55a(b)(2)(xxiii)- Evaluation of thermally cut surfaces without mechanical processing is prohibited.
- 10 CFR 50.55a(b)(2)(xxv)- Mitigation of defects by modification are prohibited
- 10 CFR 50.55a(b)(2)(xxvi)- Mechanical joints shall be tested per IWA-4540(c) of the 1998 edition.

5. Duration of Proposed Request

The duration of this request will be from the end of 3R14 or approval by the NRC staff, which ever is later, and continue for the remainder of the third ISI Interval which ends on July 21, 2009.