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F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2007-00019

April 5, 2007

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

SUBJECT: Notification of Deviation from BWRVIP Guidelines

River Bend Station
Docket No. 50-458
License No. NPF-47

Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

- REFERENCES:
1. BWRVIP-139, "BWR Vessel and Internals Project Steam Dryer Inspection and Flaw Evaluation Guidelines," Revision 0
 2. BWRVIP-94, "BWR Vessel and Internals Project Program Implementation Guide," Revision 1
 3. BWRVIP-03, "Reactor Pressure Vessel and Internals Examination Guidelines, RTR-105696-R8, Final Report, December 2005," Revision 8

Dear Sir or Madam:

Reference 2 requires a report be sent to the Nuclear Regulatory Commission (NRC) anytime a utility does not implement any portion of an applicable "mandatory" or "needed" BWRVIP guideline that has been approved by the Executive committee and transmitted to the NRC. This notification must be sent to the NRC within 45 days of the utility executive concurrence with the deviation disposition.

A deviation disposition was signed on March 15, 2007 for River Bend Station (RBS) and Grand Gulf Nuclear Station (GGNS). The deviation is to the requirements of Reference 1 which is designated as a "needed" guideline. The guidance requires a VT-1 inspection of the reactor vessel steam dryers. Reference 3, Section 2.5, "Generic Standards for Visual Inspection of Reactor Pressure Vessel Internal, Components and Associated Repairs," specifies that when a VT-1 inspection is specified in a BWRVIP document, it is intended that those inspections be performed in accordance with the utility's ASME Section XI Code of record. The current Code of record for RBS and GGNS is the 1992 edition which requires the resolution be demonstrated by use of lower case characters that are 0.044 inches in height. Earlier edition of ASME Section XI allow the resolution to be demonstrated with the use of a 1/32 inch line on an 18% neutral gray card. Several plants are still working to the earlier edition of the Code. Use of the later edition adds about 40 hours to the inspections with out

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measurable improvement. The deviation evaluates and justifies the use of an inspection resolution consistent with the earlier edition of Section XI and industry practices.

Entergy has determined that use of the resolution requirements of the 1989 edition of the Code does not affect the ability to detect cracking which would affect the integrity of the Steam Dryer. General Electric has proposed a revision to BWRVIP-139 to specify the 1/32 inch line resolution criteria specified in the 1989 edition. In the interim, Entergy initiated this deviation until the BWRVIP guidelines can be revised.

This notification is for information only and Entergy is not requesting action from the NRC staff.

Sincerely,



FGB/WBB

cc: Mr. W. R. Brian (G-ADM-1)
Mr. W. A. Eaton (ECH)
Mr. J. E. Venable (RBS)

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