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CNRO-2008-00034

December 1, 2008

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

SUBJECT: Request ISI-2008-1
Use of Later ASME Section XI Code Edition and Addenda for Repair
and Replacement, Pressure Testing, and Non Destructive Examination
Activities

Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

REFERENCE: Entergy Letter to the NRC dated August 22, 2007, Request ISI-2007-1,
Use of Later ASME Section XI Code Edition and Addenda for
Repair/replacement, Pressure Testing, and Nondestructive ISI
Examination Activities

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(g)(4)(iv), Entergy Nuclear Operations, Inc. (Entergy) requests permission to use the 2001 Edition/2003 Addenda of ASME Section XI for the performance of ISI related activities associated with repair/replacements, pressure testing, and NDE. The NRC has approved these editions and addenda of Section XI as documented in 10 CFR 50.55a(b)(2). Regarding performance demonstration of ultrasonic examinations, Entergy requests permission to use the 2001 Edition of ASME Section XI as specified in 10 CFR 50.55a(b)(2)(xxiv). This request, ISI-2008-1, is applicable to Pilgrim (PNPS) and Vermont Yankee (VY) Nuclear Power Stations and is provided in the enclosure to this letter.

Entergy is seeking approval of ISI-2008-1 in order to maintain a standard program among its nuclear facilities for repair/replacement, pressure testing, and NDE activities.

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*.

A047
LRR

Entergy requests approval of this request on or before May 29, 2009. Should you have any questions regarding this submittal, please contact Bryan Ford at (601) 368-5516.

This letter contains no commitments.

Very truly yours,



BSF/WBB

Enclosure: Request ISI-2008-1

Attachment 1: Proposed ASME Section XI Codes of Record for PNPS and VY

cc. Mr. Samuel J. Collins (w/o Attachment)
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Senior Resident Inspector
Pilgrim Nuclear Power Station

CNRO-2008-00034

bcc: Ms. C. D. Faison (K-WPO-12C)
Mr. R. S. Lewis (M-ECH-36)
Mr. O. Limpas (ECH)
Mr. D. J. Mannai (V-VYP-103)
Echelon Information Management File

ENCLOSURE

CNRO-2008-00034

ISI-2008-1

**REQUEST IN ACCORDANCE WITH 10 CFR 50.55a(g)(4)(iv) FOR USE OF LATER ASME
SECTION XI CODE EDITION AND ADDENDA FOR REPAIR/REPLACEMENT, PRESSURE
TESTING, AND NONDESTRUCTIVE ISI EXAMINATION ACTIVITIES**

ENTERGY OPERATIONS, INC.**10 CFR 50.55a Request ISI-2008-1****REQUEST IN ACCORDANCE WITH
10 CFR 50.55a(g)(4)(iv) FOR USE OF LATER ASME SECTION XI CODE
EDITION AND ADDENDA FOR REPAIR/REPLACEMENT, PRESSURE
TESTING, AND NONDESTRUCTIVE EXAMINATION ACTIVITIES****1. ASME Code Components Affected**

Class 1, 2, 3, and MC components, component supports, and welds in the ASME Section XI pressure boundary at Pilgrim Nuclear Power Station (PNPS) and Vermont Yankee (VY).

2. Applicable Code Edition and Addenda

Inservice Inspection (ISI) related activities such as repair/replacements, pressure testing, and nondestructive examination (NDE) at PNPS and VY are currently performed in accordance with the 1998 Edition/2000 Addenda of ASME Section XI with various NRC approved alternatives which are specified in the PNPS and VY ISI Programs. PNPS and VY also comply with all applicable 10 CFR 50.55a conditions and limitations.

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

PNPS and VY perform ISI related activities such as repair/replacements, pressure testing, and NDE in accordance with the 1998 Edition/2000 Addenda as described in Section 2 above. However, at other Entergy nuclear stations - Arkansas Nuclear One, Units 1 and 2 (ANO-1 & 2), Grand Gulf Nuclear Station (GGNS), Indian Point Energy Center, Unit 2 (IPEC-2), James A. FitzPatrick (JAF), Palisades Nuclear Plant (PLP), River Bend Station (RBS), and Waterford Steam Electric Station Unit 3 (WF3) - these activities are currently performed in accordance with the 2001 Edition/2003 Addenda of ASME Section XI except for alternatives (e.g. ASME Section XI Code Cases) approved by the NRC in accordance with 10 CFR 50.55a and as listed below.

- Performance demonstration of ultrasonic examinations complies with the 2001 Edition/No Addenda of Appendix VIII to comply with 10 CFR 50.55a(b)(2)(xxiv).
- The NDE provision in IWA-4540(a)(2) of the 2001 Edition/2002 Addenda are applied when performing system leakage tests after repair/replacement activities involving welding or brazing to comply with 10 CFR 50.55a(b)(2)(xx)(B).
- Pressure testing of mechanical joints of Class 1, 2, and 3 items are performed in accordance with IWA-4540(c) of the 1998 Edition/No Addenda to comply with 10 CFR 50.55a(b)(2)(xxvi).

Entergy is in the process of standardizing the performance of ISI related activities across the entire nuclear fleet. While ISI Program Plans will be controlled in site-specific documents, the repair/replacement, pressure testing, and NDE programs will be controlled in common program documents that will be corporately implemented across

Entergy is in the process of standardizing the performance of ISI related activities across the entire nuclear fleet. While ISI Program Plans will be controlled in site-specific documents, the repair/replacement, pressure testing, and NDE programs will be controlled in common program documents that will be corporately implemented across the entire nuclear fleet. To do this, the ASME Section XI Code of Record for ISI related activities at PNPS and VY must be updated to comply with the Code of Record used at other Entergy nuclear stations as described above.

B. Proposed Subsequent Code Edition and Addenda

Pursuant to 10 CFR 50.55a(g)(4)(iv), Entergy requests permission to utilize the 2001 Edition/2003 Addenda of ASME Section XI at PNPS and VY for the performance of repair/replacements, pressure testing, and NDE with the exceptions noted below:

- Performance demonstration of ultrasonic examinations will be performed in accordance with the 2001 Edition/No Addenda of Appendix VIII to comply with 10 CFR 50.55a(b)(2)(xxvi).
- The NDE provision in IWA-4540(a)(2) of the 2001 Edition/2002 Addenda will be applied when performing system leakage tests after repair/replacement activities involving welding or brazing to comply with 10 CFR 50.55a(b)(2)(xx)(B).
- Pressure testing of mechanical joints of Class 1, 2, and 3 items will be performed in accordance with IWA-4540(c) of the 1998 Edition/No Addenda to comply with 10 CFR 50.55a(b)(2)(xxiv).
- All NRC conditions, limitations, and restrictions in 10 CFR 50.55a that are applicable to the 2001 Edition/2003 Addenda of ASME Section XI will be met.

It is important to note that this request does not apply to the selection, planning, or scheduling of ISI examinations and tests as defined in IWB-, IWC-, IWD-, IWE-, and IWF-2500 or NRC approved ISI alternatives. Therefore, ISI examinations and tests at PNPS and VY will continue to be selected, planned, and scheduled in accordance with its present code of record as described in Section 2, above. See Attachment 1 for specific details regarding this proposal.

4. Related Requirements

Entergy is requesting permission to use the 2001 Edition/2003 Addenda of ASME Section XI for the performance of repair/replacements, pressure testing, and NDE with the exceptions noted in Section 3.B, above. In making this request, Entergy will comply with all related requirements in ASME Section XI as described below:

- Entergy has proposed to utilize all "Articles" (e.g. IWA-4000, IWA-5000) from every "Subsection" (e.g. IWA, IWB, etc.) of the 2001 Edition/2003 Addenda that could be used or referenced for the performance of repair/replacement, pressure testing, and NDE activities. Entergy has also stated that it will comply with all "Mandatory Appendices" of the 2001 Edition/2003 Addenda.
- Entergy will use Appendix VIII from the 2001 Edition/No Addenda of ASME Section XI in accordance with the NRC restriction in paragraph (b)(2)(xxiv) of 10 CFR 50.55a.

However, this appendix includes all pertinent requirements for performance demonstration of ultrasonic examination systems.

- Entergy will comply with IWA-4540(a) of the 2001 Edition/2002 Addenda and IWA-4540(c) of the 1998 Edition/No Addenda for pressure testing to comply with paragraphs (b)(2)(xx)(B) and (b)(2)(xxvi) of 10 CFR 50.55a. Because all applicable requirements are included in these two code paragraphs, no other ASME Section XI code paragraphs need be invoked.
- With regard to the performance of ISI examinations and tests, Entergy will continue to select, plan, and schedule these ISI inspection activities – as specified in IWA-, IWB-, IWC-, IWD-, IWE-, and IWF-2500 or NRC approved ISI alternatives – in accordance with the PNPS and VY current ISI Program Plan. See Attachment 1 for more details.

5. Duration of Proposed Request

PNPS and VY are presently in their fourth 10-Year ISI intervals. The effective dates for the ISI intervals are listed below:

- **PNPS:** July 1, 2005 thru July 30, 2015
- **VY:** September 1, 2003 thru August 31, 2013

The duration of this request will be from implementation of this alternative following approval by the NRC until the end of the fourth ISI intervals for PNPS and VY.

CNRO-2008-00034

REQUEST ISI-2008-1

ATTACHMENT 1

PROPOSED ASME SECTION XI CODES OF RECORD FOR PNPS AND VY

PROPOSED ASME SECTION XI CODE OF RECORD FOR PNPS AND VY

ASME Section XI Code Provision		ASME Section XI Code Edition/Addenda ⁴		
Sub-section	Article	1998 Edition/ 2000 Addenda	2001 Edition/ No Addenda	2001 Edition/ 2003 Addenda
IWA-General Requirements	IWA-1000			X
	IWA-2000	X ²		X ²
	IWA-3000			X
	IWA-4000			X ³
	IWA-5000			X
	IWA-6000			X
	IWA-9000			X
IWB-Req'ts for Class 1 Components	IWB-1000	X ¹		
	IWB-2000	X ¹		
	IWB-3000			X
	IWB-5000			X
IWC-Req'ts for Class 2 Components	IWC-1000	X ¹		
	IWC-2000	X ¹		
	IWC-3000			X
	IWC-5000			X
IWD-Req'ts for Class 3 Components	IWD-1000	X ¹		
	IWD-2000	X ¹		
	IWD-3000			X
	IWD-5000			X
IWE-Req'ts for Class MC Components	IWE-1000	X ¹		
	IWE-2000	X ¹		
	IWE-3000			X
	IWE-5000			X
IWF-Req'ts for Class 1, 2, 3, and MC Supports	IWF-1000	X ¹		
	IWF-2000	X ¹		
	IWF-3000			X
	IWF-5000			X
Mandatory Appendices	I			X
	II			X
	III			X
	IV			X
	V			X
	VI			X
	VII			X
	VIII		X	
	IX			X

PROPOSED ASME SECTION XI CODE OF RECORD FOR PNPS AND VY**Notes:**

- (1) The selection, planning, and scheduling of ISI examinations/tests will comply with these ASME Section XI *articles* (e.g. IWB-1000 and 2000) or applicable NRC approved alternatives that are specified in the PNPS and VY ISI Program Plans. Therefore, PNPS and VY will continue to comply with its original Code of Record when performing these ISI activities.
- (2) PNPS and VY are proposing to use IWA-2100, 2200, and 2300 from the 2001 Edition/2003 Addenda for requirements applicable to authorized inspection, examination methods, and qualification of NDE personnel. However, PNPS and VY will continue to comply with its original Code of Record when using IWA-2400, 2500, 2600 for the selection, planning, and scheduling of ISI examinations and tests.
- (3) As exceptions to IWA-4000 of the 2001 Edition/2003 Addenda, PNPS and VY will comply with the alternatives listed below to comply with NRC restrictions in 10 CFR.55a:
 - The NDE provision in IWA-4540(a)(2) of the 2001 Edition/2002 Addenda will be applied when performing system leakage tests after repair/replacement activities involving welding or brazing to comply with 10 CFR 50.55a(b)(2)(xx)(B).
 - Pressure testing of mechanical joints of Class 1, 2, and 3 items will be performed in accordance with IWA-4540(c) of the 1998 Edition/No Addenda to comply with 10 CFR 50.55a(b)(2)(xxvi).
- (4) Entergy will also comply with all NRC conditions, limitations, and restrictions specified in 10 CFR 50.55a.