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GNRO-2009/00060

October 22, 2009

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

SUBJECT: Request to Use Portion of Later Edition to the American Society of
Mechanical Engineers Code for Operation and Maintenance of Nuclear
Power Plants for Main Steam Safety Relief Valve Inservice Testing

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

REFERENCE: NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use
of Later Editions and Addenda to the ASME OM Code and Section
XI," dated July 28, 2004

Dear Sir or Madam:

Pursuant to 10CFR50.55a(f)(4)(iv) and in accordance with the guidance provided in NRC RIS 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," (Reference 1), Entergy Operations, Inc. (Entergy) requests approval to use a portion of a later code edition of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the Grand Gulf Nuclear Station (GGNS) Inservice Testing (IST) Program. Specifically, Entergy requests approval to implement Mandatory Appendix I, Paragraph I-3410(d) of the 2004 Edition of the ASME OM Code at GGNS for Main Steam Safety Relief Valve Inservice Testing.

Paragraph 10CFR50.55a(f)(4)(ii) requires the use of the latest edition and addenda that have been incorporated by reference 12 months prior to the beginning of each 120-month interval. For GGNS, the current 120-month interval uses the 2001 Edition of the ASME OM Code through 2003 Addenda. Licensees that plan to use for their IST program later editions and addenda of the ASME OM Code that have been incorporated by reference into 10CFR50.55a must submit a request for NRC approval pursuant to 10CFR50.55a(f)(4)(iv) prior to its use.

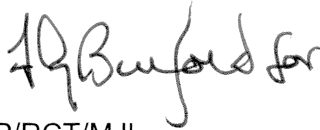
As noted in NRC RIS 2004-12, licensees seeking to use later editions and addenda of the ASME OM Code, pursuant to 10CFR50.55a(f)(4)(iv) for inservice testing items are not required to seek alternatives pursuant to 10CFR50.55a(a)(3) or relief pursuant to 10CFR50a(f)(5)(iv).



The request is detailed in the attachment to this letter. Entergy requests approval of this request by March 15, 2010, to support testing planned for the seventeenth refueling outage (RF-17), which is currently scheduled to begin in Spring of 2010.

This letter contains no commitments. Should you have any questions regarding this submittal, please contact Michael Larson, at 601-437-6685.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Larson" with a stylized flourish at the end.

CLP/RCT/MJL

Attachment: 10CFR50.55a Request Number GGNS-2009-01, Refueling Outage 17
Main Steam Safety Relief Valve Inservice Testing

cc: NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

U. S. Nuclear Regulatory Commission
ATTN: Mr. Elmo E. Collins (w/a)
Regional Administrator, Region IV
612 East Lamar Drive, Suite 400
Arlington, TX 76011-4005

U.S. Nuclear Regulatory Commission
ATTN: Mr. Carl F. Lyon, NRR/ADRO/DORL (w/2)
Mail Stop OWFN/8 B1
11555 Rockville Pike
Rockville, MD 20852-2378

Attachment

to

GNRO-2009/00060

10CFR50.55a Request Number GGNS-2009-01

Refueling Outage 17

Main Steam Safety Relief Valve Inservice Testing

Request in Accordance with 10 CFR 50.55a(f)(4)(iv) For Use of Subsequent ASME Code Edition and Addenda	
<p>Pursuant to 10CFR 50.55a(f)(4)(iv) and in accordance with the guidance provided in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) and Section XI," Entergy Operations, Inc. (Entergy) requests approval to use a portion of a later code edition of the ASME OM Code for the Grand Gulf Nuclear Station (GGNS) Inservice Testing (IST) Program.</p> <p>Specifically, Entergy requests approval to implement Mandatory Appendix I, Paragraph I-3410(d) of the 2004 Edition of the ASME OM Code at GGNS for Main Steam Safety Relief Valve Inservice Testing.</p>	
PLANT/UNIT:	GGNS, Unit 1
INTERVAL:	Third 10 Year Inservice Testing Interval
ASME CODE COMPONENTS AFFECTED:	<p>Main Steam Safety Relief Valve (20 valves installed)</p> <p>Model: G-471</p> <p>Manufacturer: Dikkers Valves</p>
APPLICABLE CODE EDITION AND ADDENDA:	<p>For GGNS, the current 120-month IST program interval uses the 2001 Edition of the ASME OM Code through the 2003 Addenda, which includes the following (from Mandatory Appendix I) requirement:</p> <p><i>I-3400 Disposition After Testing or Maintenance</i></p> <p><i>I-3410 Class I Main Steam Pressure Relief Valves With Auxiliary Actuating Devices</i></p> <p><i>(d) Each valve that has been maintained or refurbished in place, removed for maintenance and testing, or both, and reinstalled shall be remotely actuated at reduced or normal system pressure to verify open and close capability of the valve before resumption of electric power generation. Set-pressure verification is not required.</i></p>

Request in Accordance with 10 CFR 50.55a(f)(4)(iv) For Use of Subsequent ASME Code Edition and Addenda	
PROPOSED SUBSEQUENT CODE EDITION AND ADDENDA (OR PORTION):	<p>Entergy requests approval to use a portion of Mandatory Appendix I to the 2004 Edition of the ASME OM Code at GGNS for Main Steam Safety Relief Inservice Testing. Federal Register, Volume 73, Number 176, dated September 10, 2008 (73 FR 52730), incorporates by reference the 2004 Edition of the ASME OM Code in 10CFR50.55a(b)(3). The specific paragraph to be used is I-3410(d), which is copied as follows:</p> <p style="text-align: center;"><i>I-3400 Disposition After Testing or Maintenance</i></p> <p style="text-align: center;"><i>I-3410 Class I Main Steam Pressure Relief Valves With Auxiliary Actuating Devices</i></p> <p style="text-align: center;"><i>(d) Each valve with an auxiliary actuating device that has been removed for maintenance or testing and reinstalled after meeting the requirements of I-3310, shall have the electrical and pneumatic connections verified either through mechanical / electrical inspection or test prior to the resumption of electric power generation. Main disc movement and set-pressure verification are not required.</i></p>
RELATED REQUIREMENTS:	<p>10CFR50.55a(f)(4)(iv) states:</p> <p style="text-align: center;"><i>Inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met.</i></p> <p>The requirements of Mandatory Appendix I, Paragraph I-3410(d) of the 2004 Edition of the ASME OM Code are not modified by 10CFR50.55a(b).</p> <p>Reviews of differences between our current Code of Record, 2001 Edition of the ASME OM Code through the 2003 Addenda, and the 2004 Edition of the ASME OM Code did not result in identification of any related requirements to Mandatory Appendix I, Paragraph I-3410(d).</p>
DURATION OF PROPOSED REQUEST:	<p>The duration of the proposed request is for the remainder of GGNS's Third 10 Year Inservice Testing Interval, which began on December 1, 2007, and ends on November 30, 2017.</p>
STATUS:	<p>Submitted for Nuclear Regulatory Commission approval.</p>