

**From:** Wang, Alan  
**Sent:** Monday, January 11, 2010 2:07 PM  
**To:** BURMEISTER, BARRY M; David Lorfing (DLorfin@entergy.com)  
**Cc:** Lent, Susan; Burkhardt, Janet; Nove, Carol  
**Subject:** Request for Additional Information Regarding Relief Requests RBS ISI-RR-007, 008,009, 010 and 011 (ME1466, 1467, 1470, 1471, and 1472)

Barry and Dave,

By letter dated May 29, 2009, (Agencywide Documents Access & Management System (ADAMS) Accession No. ML091560230), Entergy Operations, Inc. (Entergy, the licensee), submitted requests relief from the requirements of the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel (B&PV) Code, Section XI pertaining to volumetric and visual examinations at River Bend Station, Unit 1 (RBS). In several locations, the required coverage cannot be obtained due to interference or geometry.

The NRC staff has determined that the following additional information is needed to complete its review of the subject RR for RBS. This request was discussed with Barry Burmeister of your staff on January 8, 2010, and it was agreed that a response would be provided by February 19, 2010. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1445 or via e-mail at [Alan.Wang@nrc.gov](mailto:Alan.Wang@nrc.gov).

## **1.0 General Information Required on All Requests for Relief**

- 1.1 Based on the submittal, it is unclear which Edition and Addenda of ASME Code, Section XI, is applicable to the specific components listed in the individual relief requests. For example, in RR RBS-ISI-007, Entergy lists the 1980 Edition through the 1981 Addenda, the 1992 Edition, and the 1995 Edition through the 1996 Addenda as having applicable ISI requirements for the subject components. Entergy states that the 1995 Edition through the 1996 Addenda of ASME Code was mandated for implementation of ASME Code, Section XI, Appendix VIII examinations during the interval, however, this does not clear up the multiple ASME Code applicability issues. Please confirm the ASME Code of record for the second interval inservice inspection program at RBS, how Entergy arrived at this edition/addenda of the ASME Code, and the specific requirements for each of the subject components listed in each request for relief. If the 1992 Edition was the primary ASME Code of record invoked for the second 10-year interval, confirm that no Addenda were included.
- 1.2 Provide the start and end dates for the RBS second 10-year inservice inspection interval.
- 1.3 Provide the inspection dates for all welds listed in the requests for relief for the RBS second 10-year ISI.

## **2.0 Request for Relief RBS-ISI-010, Examination Category B-J, Items B9.11 and B9.31, Pressure Retaining Welds in Piping**

State the material of construction of the weld and base metal (e.g., wrought stainless steel) for each component listed in Table 2.2.1.

<b>Table 2.2.1 - Examination Category B-J</b>		
<b>Code Item</b>	<b>Weld ID</b>	<b>Weld Type</b>
B9.11	RCS-900C-FWB06	RCS pump to 20' Pipe
B9.11	RCS-900C-FWB15	Sweep-O-Let to 10" Pipe
B9.11	RCS-900CFWB16	Sweep-O-Let to 10" Pipe
B9.31	RCS-900CX-SW014BC	16" Pipe to Sweep-O-Let
B9.31	RCS-900CX-SW014CB	16" Pipe to Sweep-O-Let
B9.11	WCS-001A1-XI-FW005	4' Pipe to valve
B9.11	WCS-001A3-XI-FW011	4" Pipe to reducer
B9.11	WCS-005A-XI-SW002	6" Pipe to tee
B9.11	WCS-005A-XI-SW003	6" Tee to branch
B9.11	WCS-001A3-XI-SW002	6" Pipe to tee

**3.0 Request for Relief RBS-ISI-011, Examination Category B-K, Item B10.10, Integral Attachments for Vessels, Piping, Pumps, and Valves**

Entergy has requested relief from the requirements of Examination Category B-K, Item B10.10, to address limited surface examinations on the reactor pressure vessel (RPV) support skirt weld. However, the 1992 Edition of the ASME Code does not have an Examination Category B-K. The subject RPV support skirt examination requirements are listed in Examination Category B-H.

It appears that Entergy may have invoked ASME Code Case N-509, *Alternative Rules for the Selection and Examination of Class 1, 2, and 3 Integrally Welded Attachments, Section XI, Division 1*, which lists Examination Category B-K, and states requirements for this, and other integral attachment, welds. ASME Code Case N-509 is conditionally acceptable according to an earlier revision of Regulation Guide 1.147, *Inservice Inspection Code Case Acceptability*, which may have been in effect at the start of the licensee's second 10-year inspection interval. The NRC staff condition for acceptable use was that a minimum 10% sample of integrally welded attachments for each item in each ASME Code class shall be examined during each interval.

State whether ASME Code Case N-509 was invoked for the second interval at RBS, and confirm that the listed condition for acceptance was applied for all Class 1, 2 and 3 integral attachment welds.

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