Entergy Operations Inc.
17265 River Road
Killona, LA 70057-3093
Tel 504-739-6685
Fax 504-739-6678
jjarrel@entergy.com

John P. Jarrell, III
Regulatory Assurance Manager
Waterford 3

W3F1-2016-0054 10 CFR 50.55a

August 10, 2016

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

SUBJECT: Request for Alternative to the ASME Code to Adopt Approved Code Case OMN-20, "Inservice Test Frequency."
Relief Request WF3-RR-2016-1
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCE: Entergy letter W3F1-2016-0036, "Application to Revise Technical Specifications to Adopt TSTF-545, Revision 3, 'TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing,' and to Request an Alternative to the ASME Code" dated July 25, 2016. [ADAMS Accession No. ML16207A532]

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(z)(2), "Codes and Standards," Entergy Operations, Inc. (Entergy) hereby requests NRC approval of the attached relief request.

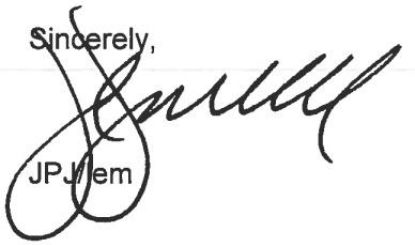
Entergy is requesting approval to use an alternative to the testing frequencies in the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, by adoption of approved Code Case OMN-20, "Inservice Test Frequency," for the third 10 year Inservice Testing (IST) interval. The details of this relief request are contained in Attachment 1.

This request was first combined with the license amendment request referenced above. The NRC staff has requested that it be submitted separately. This letter submits the relief request separately, as requested. Entergy requests approval of the relief request by July 25, 2017.

No new commitments have been identified in this letter.

If you have any questions or require additional information, please contact John Jarrell at 504-739-6685.

Sincerely,



JPJ/em

Attachments:

1. Relief Request WF3-RR-2016-1

cc: Mr. Kriss Kennedy
Regional Administrator
ridsrgn4mailcenter@nrc.gov

NRC Senior Resident Inspector
Frances.Ramirez@nrc.gov
Chris.Speer@nrc.gov

NRC Project Manager - Waterford 3
Dr. April Pulvirenti
April.Pulvirenti@nrc.gov

Attachment 1 to

W3F1-2016-0054

Relief Request WF3-RR-2016-1

DESCRIPTION AND ASSESSMENT OF THE PROPOSED ALTERNATIVE TO THE ASME CODE

Request in Accordance with 10 CFR 50.55a(z)(2)

Alternative Due To Hardship Without a Compensating Increase in Quality and Safety

1.0 DESCRIPTION

The request is to adopt a proposed alternative to the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code by adoption of approved Code Case OMN-20, "Inservice Test Frequency."

2.0 ASSESSMENT

Technical Evaluation of the Proposed Alternative to the OM Code

Section IST of Division 1 of the OM Code, which is incorporated by reference in 10 CFR 50.55a(a), specifies component test frequencies based either on elapsed time periods (e.g., quarterly, 2 years) or on the occurrence of a plant condition or event (e.g., cold shutdown, refueling outage).

ASME Code Case OMN-20, “Inservice Test Frequency,” has been approved for use by the ASME OM committee as an alternative to the test frequencies for pumps and valves specified in ASME OM Division 1, Section IST, 2009 Edition through OMa-2011 Addenda, and all earlier editions and addenda of ASME OM Code.

Code Case OMN-20 is not referenced in the latest revision of Regulatory Guide 1.192 (August 2014) as an acceptable OM Code Case to comply with 10 CFR 50.55a(f) requirements as allowed by 10 CFR 50.55a(b)(6). The proposed alternative is to use Code Case OMN-20 to extend or reduce the IST frequency requirements for the third 10-year IST interval or until OMN-20 is incorporated into the next revision of Regulatory Guide 1.192.

ASME Code Components Affected

The Code Case applies to pumps and valves specified in ASME OM Division 1, Section IST, 2009 Edition through OMa-2011 Addenda and all earlier editions and addenda of ASME OM Code. Frequency extensions may also be applied to accelerated test frequencies (e.g., pumps in Alert Range) as specified in OMN-20.

For pumps and valves with test periods of 2 years of less, the test frequency allowed by OMN-20 and the current Technical Specification (TS) Inservice Testing Program (as modified by Surveillance Requirement (SR) 3.0.2 and Enforcement Guidance Memorandum (EGM) 2012-001) are the same. For pumps and valves with test frequencies greater than 2 years, OMN-20 allows the test frequency to be extended by 6 months. The current TS Inservice Testing (IST) Program does not allow extension of test frequencies that are greater than 2 years.

Applicable Code Edition and Addenda

ASME Code Case OMN-20 applies to ASME OM Division 1, Section IST, 2009 Edition through OMa-2011 Addenda and all earlier editions and addenda of ASME OM Code.

The Waterford Steam Electric Station, Unit 3 (Waterford 3) Code Edition and Addenda that are applicable to the program interval are the ASME OM Code 2001 Edition with addenda through and including the ASME OMb Code-2003 Adenda (referred to as OMB-2003) (reference Entergy Letter GNRI-96/00184) dated August 27, 1996, TAC M94454. The Waterford 3 current interval began on December 1, 2007 and ends November 30, 2017.

Applicable Code Requirement

This request is made in accordance with 10 CFR 50.55a(z)(2), and proposes an alternative to the requirements of 10 CFR 50.55a(f), which requires pumps and valves to meet the test requirements set forth in specific documents incorporated by reference in 10 CFR 50.55a(a). ASME Code Case OMN-20 applies to Division 1, Section IST of the ASME OM Code and associated addenda incorporated by reference in 10 CFR 50.55a(a).

Reason for Request

NOTE: The discussions within this request for alternative refer to NUREG-1432, “Standard Technical Specifications – Combustion Engineering Plants,” Revision 4, SR numbering. The equivalent Waterford 3 SRs are 4.0.2 and 4.0.3.

The IST Program controls specified in Section 6.5.8 of the Waterford 3 TS provide: a) a table specifying certain IST frequencies; b) an allowance to apply SR 4.0.2 to inservice tests required by the OM Code and with frequencies of two years or less; c) an allowance to apply SR 4.0.3 to inservice tests required by the OM Code; and d) a statement that, “Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.” In Regulatory Issue Summary (RIS) 2012-10, "NRC Staff Position on Applying Surveillance Requirement 3.0.2 and 3.0.3 to Administrative Controls Program Tests," and EGM 2012-001, "Dispositioning Noncompliance with Administrative Controls Technical Specifications Programmatic Requirements that Extend Test Frequencies and Allow Performance of Missed Tests," the NRC stated that items b, c, and d of the TS IST Program were inappropriately added to the TS and may not be applied (although the EGM allows licensees to continue to apply those paragraphs pending a generic resolution of the issue).

In RIS 2012-10 and EGM 2012-001, the NRC stated that the current TS allowance to apply SR 3.0.2 and SR 3.0.3 to the IST Program would no longer be permitted. In response, OMN-20, which provides allowances similar to SR 3.0.2, was approved and is proposed to be used as an alternative to the test periods specified in the OM code. The proposed alternative substitutes an approved Code Case for the existing TS requirements that the NRC has determined are not legally acceptable as a TS allowance. This proposed alternative provides an equivalent level of safety as the existing TS allowance, while maintaining consistency with 10 CFR 50.55a and the ASME OM Code.

Proposed Alternative and Basis for Use

The proposed alternative is OMN-20, "Inservice Test Frequency," which addresses testing periods for pumps and valves specified in ASME OM Division 1, Section IST, 2009 Edition through OMa-2011 Addenda, and all earlier editions and addenda of ASME OM Code.

This request is being made in accordance with 10 CFR 50.55a(z)(2), in that the existing requirements are considered a hardship without a compensating increase in quality and safety for the following reasons:

1) For IST testing periods up to and including 2 years, Code Case OMN-20 provides an allowance to extend the IST testing periods by up to 25%. The period extension is to facilitate test scheduling and considers plant operating conditions that may not be suitable for performance of the required testing (e.g., performance of the test would cause an unacceptable increase in the plant risk profile due to transient conditions or other ongoing surveillance, test or maintenance activities). Period extensions are not intended to be used repeatedly, merely as an operational convenience to extend test intervals beyond those specified. The test period extension and the statements regarding the appropriate use of the period extension are equivalent to the existing TS SR 3.0.2 allowance and the statements regarding its use in the SR 3.0.2 Bases. Use of the SR 3.0.2 period extension has been a practice in the nuclear industry for many decades and elimination of this allowance would place a hardship on Entergy Operations, Inc. (Entergy), when there is no evidence that the period extensions affect component reliability.

2) For IST testing periods of greater than 2 years, OMN-20 allows an extension of up to 6 months. The ASME OM Committee determined that such an extension is appropriate. The 6-month extension will have a minimal impact on component reliability considering that the most probable result of performing any inservice test is satisfactory verification of the test acceptance criteria. As such, pumps and valves will continue to be adequately assessed for operational readiness when tested in accordance with the requirements specified in 10 CFR 50.55a(f) with the frequency extensions allowed by Code Case OMN-20.

3) As stated in EGM 2012-001, if an inservice test is not performed within its frequency, SR 3.0.3 will not be applied. The effect of a missed inservice test on the operability of TS equipment will be assessed under the licensee's Operability Determination Program.

Duration of Proposed Alternative

The proposed alternative is requested until the end of the current 10-year IST interval or until Code Case OMN-20 is incorporated into a future revision of Regulatory Guide 1.192, referenced by a future revision of 10 CFR 50.55a, whichever occurs first.

Precedents

The NRC approved the use of OMN-20 for North Anna on March 27, 2014 (NRC ADAMS Accession Number ML14084A407).