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10 CFR 50.55a

W3F1-2017-0046

June 13, 2017

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

Subject: Relief Requests Associated with the Fourth Inservice Testing Interval
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a, "Codes and Standards," Entergy Operations, Inc. (Entergy) hereby requests NRC approval of the attached requests for relief from the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code for the Waterford 3 Fourth 10-Year Inservice Testing (IST) Program interval that begins December 1, 2017. Additional details regarding these relief requests are provided in Attachments 1, 2, and 3. Entergy requests approval by June 13, 2018.

The Waterford 3 IST program is being revised to comply with the ASME OM Code-2004 Edition though OMb 2006 Addenda as currently endorsed by the NRC in 10 CFR 50.55a. The revised IST program plan for the fourth 10-year interval will be submitted by separate correspondence.

This letter contains no new commitments.

If you have any questions or require additional information, please contact the Regulatory Assurance Manager, John P. Jarrell, at (504) 739-6685.

Sincerely,

JPJ/MMZ

Attachments:
1. Entergy Operations, Inc. IST Program Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1) PRR-WF3-2017-1
2. Entergy Operations, Inc. IST Program Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1) PRR-WF3-2017-2
3. Entergy Operations, Inc. IST Program Proposed Alternative in Accordance with 10 CFR 50.55a(z)(2) GRR-WF3-2017-1

cc: Mr. Kriss Kennedy, Regional Administrator
U.S. NRC, Region IV
RidsRgn4MailCenter@nrc.gov

U.S. NRC Project Manager for Waterford 3
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Attachment 1

to

W3F1-2017-0046

Entergy Operations, Inc.
IST Program
Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1)
PRR-WF3-2017-1

(3 pages)

ENTERGY OPERATIONS, INC.
IST PROGRAM
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(z)(1)
PRR-WF3-2017-1

PLANT/UNIT:	Waterford Steam Electric Station, Unit 3 (WF3)
INTERVAL:	4th Interval beginning December 1, 2017, and ending November 30, 2027
COMPONENTS AFFECTED:	CVC-MPMP-0001A, Charging Pump A CVC-MPMP-0001AB, Charging Pump AB CVC-MPMP-0001B, Charging Pump B NOTE: Each of the above pumps are ASME Code Class 2, positive displacement, motor driven, OM Code Group A pumps.
CODE EDITION AND ADDENDA:	ASME OM Code-2004 Edition through OMb 2006 Addenda
REQUIREMENTS:	ASME OM Code-2004 Edition through OMb 2006 Addenda, Subsection ISTB-3510, "Data Collection, General," (b)(1), *Range*, requires the full-scale range of each analog instrument shall be not greater than three times the reference value.
REASON FOR REQUEST:	Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), an alternative is requested when using the requirements of ASME OM Code ISTB-3510(b)(1). This request is that the proposed alternative provides an acceptable level of quality and safety. This alternative is a re-submittal of NRC approved 3rd interval PRR-WF3-2007-1, which was based on the ASME OM Code-2001 Edition through the OMb 2003 Addenda. This 4th interval alternative request is based on the ASME OM Code 2004 Code Edition through OMb 2006 Addenda. There have been no substantive changes to this alternative, to the OM Code requirements or to the basis for use, which would alter the previous NRC Safety Evaluation conclusions. The Charging Pumps' discharge flow indicator (QSPDS 1) does not comply with this requirement. Specifically, each of the three pumps has a reference flow, for both Group A and Comprehensive pump tests, of approximately 44 gallons per minute (gpm) and the flow gauge has a full-scale range of 150 gpm in order to accommodate three-pump flow, such as during safety injection operations. The full-scale range is approximately 3.4 times the reference value.

PROPOSED ALTERNATIVE AND BASIS:

The existing, installed flow indicator will be used for the Group A and Comprehensive pump testing per the ASME OM Code 2004 Edition through OMb 2006 Addenda ISTB Requirements.

According to Revision 2 of NUREG 1482, Section 5.5.1, when the range of a permanently installed analog instrument is greater than three times the reference value, but the accuracy of the instrument is more conservative than that required by the Code, the staff may grant approval to use an alternative when the combination of the range and accuracy yields a reading that is at least equivalent to that achieved using instruments that meet the Code requirements (i.e., up to ±6% for Group A and B tests and ±1.5% for pressure and differential pressure instruments for Preservice and Comprehensive tests).

The full-scale accuracy of the instrument loop used for measuring the charging pump discharge flow is ± 1.7% or 2.6 gpm. This accuracy is more conservative than the ± 2.0% required by Subsection ISTB-3510 of the ASME OM Code 2004 Edition through OMb 2006 Addenda.

The combination of range and accuracy (Equivalent Code Accuracy) for the charging pumps' discharge flow instrument loop is depicted in the table below. In each of the three pumps, the combined range and accuracy is more conservative than the combined range and accuracy of instruments that meet the minimum Code requirements (i.e., up to ± 6%). An alternative is proposed in accordance with the guidance provided by the NRC in NUREG 1482, Revision 2, Section 5.5.1, Range and Accuracy of Analog Instruments.

PUMP	RANGE (GPM)	*REF. VALUE (GPM)	INSTRUMENT LOOP ACCURACY	EQUIVALENT CODE ACCURACY
A	0 - 150	43.9	+/- 1.7% +/- 2.6 gpm	[2.6 / (3 x 43.9)] x 100 = 1.97%
B	0 - 150	44.5	+/- 1.7% +/- 2.6 gpm	[2.6 / (3 x 44.5)] x 100 = 1.95%
AB	0 - 150	44.2	+/- 1.7% +/- 2.6 gpm	[2.6 / (3 x 44.2)] x 100 = 1.96%

* The above table reflects the latest reference values as specified in the implementing procedures. This table will not be updated to reflect changes in future reference values.

Based on the determination that the alternative provides an acceptable level of quality and safety, this alternative is proposed pursuant to 10 CFR 50.55a(z)(1).

DURATION:

4th IST Interval, December 1, 2017, through November 30, 2027

PRECEDENT: Relief from this requirement was previously granted as PRR-WF3-2007-1 during Waterford's third 120-month Inservice Test Interval on the basis that the proposed alternative would provide an acceptable level of quality and safety. That approval was documented in the NRC safety evaluation report dated June 10, 2008 (Reference 2).

REFERENCES:

1. NUREG-1482, Revision 2, Guidelines for Inservice Testing at Nuclear Power Plants: Inservice Testing of Pumps and Valves and Inservice Examination and Testing of Dynamic Restraints (Snubbers) at Nuclear Power Plants, dated October 2013 (ML13295A020)

2. Letter from the NRC (T. G. Hiltz) to Entergy Operations, Inc., "Waterford Steam Electric Station, Unit 3 – Relief Request for 10 Year Updates to the 120 Month Inservice Testing Intervals (TAC No. MD7728)," dated June 10, 2008 (ML080930176)

Attachment 2

to

W3F1-2017-0046

Entergy Operations, Inc.
IST Program
Proposed Alternative in Accordance with 10 CFR 50.55a(z)(1)
PRR-WF3-2017-2

(4 pages)

ENTERGY OPERATIONS, INC.
IST PROGRAM
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(z)(1)
PRR-WF3-2017-2

PLANT/UNIT: Waterford Steam Electric Station, Unit 3 (WF3)

INTERVAL: 4th Interval beginning December 1, 2017, and ending November 30, 2027

COMPONENTS AFFECTED: Refer to Table PRR-WF3-2017-2 (see page 4 of this attachment)

CODE EDITION AND ADDENDA: ASME OM Code-2004 Edition through OMb 2006 Addenda

REQUIREMENTS: ISTB-5121, Group A Test Procedure, paragraph ISTB-5121(b) states, in part, that "The resistance of the system shall be varied until the flow rate equals the reference point. … Alternatively, the flow rate shall be varied until the differential pressure equals the reference point."

ISTB-5122, Group B Test Procedure, paragraph ISTB-5122(c) states, "System resistance may be varied as necessary to achieve the reference point."

ISTB-5123, Comprehensive Test Procedure, paragraph ISTB-5123(b) states, in part, that "The resistance of the system shall be varied until the flow rate equals the reference point. … Alternatively, the flow rate shall be varied until the differential pressure equals the reference point."

REASON FOR REQUEST: Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), an alternative is proposed to the pump testing reference value requirements of the ASME OM Code. The basis of the request is that the proposed alternative would provide an acceptable level of quality and safety. Specifically, this alternative is requested for all pump Inservice Tests (ISTs) at WF3. IST Program pumps are listed in Table PRR-WF3-2017-2, Pumps Affected by Alternative Request PRR-WF3-2017-2.

For pump testing, there is difficulty adjusting system throttle valves with sufficient precision to achieve exact flow reference values during subsequent IST tests. Section ISTB of the ASME OM Code does not allow for variance from a fixed reference value for pump testing.

However, NUREG-1482, Revision 2, Section 5.3, acknowledges that certain pump system designs do not allow for the licensee to set the flow at an exact value because of limitations in the instruments and controls for maintaining steady flow.

REASON FOR REQUEST: (continued)

ASME OM Code Case OMN-21, "Alternative Requirements for Adjusting Hydraulic Parameters to Specified Reference Points," provides guidance for adjusting reference flow or differential pressure (ΔP) to within a specified tolerance during pump inservice testing. The Code Case states:

"It is the opinion of the Committee that when it is impractical to operate a pump at a specified reference point and adjust the resistance of the system to a specified reference point for either flow rate, differential pressure or discharge pressure, the pump may be operated as close as practical to the specified reference point with the following requirements. The Owner shall adjust the system resistance to as close as practical to the specified reference point where the variance from the reference point does not exceed +2% or -1% of the reference point when the reference point is flow rate, or +1% or -2% of the reference point when the reference point is differential pressure or discharge pressure."

The NRC also discusses this ASME Code change in NUREG-1482, Revision 2, Section 5.3.

PROPOSED ALTERNATIVE AND BASIS:

WF3 seeks to perform future inservice pump testing in a manner consistent with the requirements as stated in ASME OM Code Case OMN-21. Specifically, testing of all pumps identified in Table PRR-WF3-2017-2 will be performed such that the flow rate is adjusted as close as practical to the reference value and within proceduralized limits of +2% / -1% of the reference flow rate or alternatively the differential pressure or discharge pressure is adjusted as close as practical to the reference value and within proceduralized limits of +1% / -2% of the reference pressure or differential pressure.

WF3 plant operators will continue to strive to adjust as close as practical to the reference values (flow or differential pressure) during testing. Typical test guidance will be to adjust the reference parameter (i.e., flow or differential pressure) to the specific reference value with additional guidance that if the reference value cannot be achieved with reasonable effort, the test will be considered valid if the steady state flow rate is within the proceduralized limits of +2% / -1% of the reference value or the steady state pressure or differential pressure is within the proceduralized limits of +1% / -2% of the reference value.

Using the provisions of this request as an alternative to the specific requirements of ISTB-5121, ISTB-5122, and ISTB-5123 as described above, will provide adequate indication of pump performance and continue to provide an acceptable level of quality and safety.

Based on the determination that the use of controlled reference value ranges provides an acceptable level of quality and safety, this alternative is being proposed pursuant to 10 CFR 50.55a(z)(1).

DURATION: 4th IST Interval, December 1, 2017, through November 30, 2027

PRECEDENTS:

1. Callaway Plant, Unit 1 – Relief Request PR-06, Alternative to ASME OM Code Requirements for IST for the Fourth Program Interval – Safety Evaluation dated July 15, 2014 (ML14178A769)

2. Wolf Creek Generating Station – Request for Relief No. 4PR-01 for the Fourth 10-Year Inservice Testing Program Interval – Safety Evaluation dated May 15, 2015 (ML15134A002)

3. Vogtle Electric Generating Station – Request RR-PR-02, Alternative for Pump and Valve Inservice Testing Program – Safety Evaluation dated December 8, 2016 (ML16326A044)

REFERENCES:

1. ASME Code Case OMN-21, Alternate Requirements for Adjusting Hydraulic Parameters to Specified Reference Points

2. NUREG-1482, Revision 2, Guidelines for Inservice Testing at Nuclear Power Plants: Inservice Testing of Pumps and Valves and Inservice Examination and Testing of Dynamic Restraints (Snubbers) at Nuclear Power Plants, Section 5.3, Allowable Variance from Reference Points and Fixed-Resistance Systems, dated October 2013 (ML13295A020)

Table PRR-WF3-2017-2
Pumps Affected by Alternative Request PRR-WF3-2017-2

Pump Groups	Description	Pump Type	Code Class	OM Code Category
ACC-MPMP-0001A ACC-MPMP-0001B	Auxiliary Component Cooling Water Pumps	Centrifugal	3	Group A
BAM-MPMP-0001A BAM-MPMP-0001B	Boric Acid Pumps	Centrifugal	3	Group A
CC-MPMP-0001A CC-MPMP-0001AB CC-MPMP-0001B	Component Cooling Water Pumps	Centrifugal	3	Group A
CHW-MPMP-0001A CHW-MPMP-0001AB CHW-MPMP-0001B	Chilled Water Pumps	Centrifugal	3	Group A
CMU-MPMP-0004A CMU-MPMP-0004B	Component Cooling Water Makeup Pumps	Centrifugal	3	Group B
CS-MPMP-0001A CS-MPMP-0001B	Containment Spray Pumps	Centrifugal	2	Group B
EFW-MPMP-0001A EFW-MPMP-0001AB EFW-MPMP-0001B	Emergency Feedwater Pumps	Centrifugal	3	Group B
SI-MPMP-0001A SI-MPMP-0001B	Low Pressure Safety Injection Pumps	Centrifugal	2	Group A
SI-MPMP-0002A SI-MPMP-0002AB SI-MPMP-0002B	High Pressure Safety Injection Pumps	Centrifugal	2	Group B

Attachment 3

to

W3F1-2017-0046

Entergy Operations, Inc.
IST Program
Proposed Alternative in Accordance with 10 CFR 50.55a(z)(2)
GRR-WF3-2017-1

(6 pages)

ENTERGY OPERATIONS, INC.
IST PROGRAM
PROPOSED ALTERNATIVE IN ACCORDANCE WITH 10 CFR 50.55a(z)(2)
GRR-WF3-2017-1

PLANT/UNIT: Waterford Steam Electric Station, Unit 3 (WF3)

INTERVAL: 4th Interval beginning December 1, 2017, and ending November 30, 2027

COMPONENTS AFFECTED: All Pumps and Valves contained in the WF3 Inservice Testing (IST) Program scope.

CODE EDITION AND ADDENDA: ASME OM Code-2004 Edition through OMb 2006 Addenda

REQUIREMENTS: This request applies to the frequency specifications of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code. The frequencies for tests given in the ASME OM Code include the following, but do not include a tolerance band:

ISTA-3120(a), Inservice Test Interval, states, "The frequency for inservice testing shall be in accordance with the requirements of Section IST."

ISTB-3400, Frequency of Inservice Tests, states, “An inservice test shall be run on each pump as specified in Table ISTB-3400-1.”

Table ISTB-3400-1, Inservice Test Frequency, notes that Group A and Group B pump tests are to be conducted quarterly. Comprehensive pump tests are to be conducted biennially.

ISTC-3510, Exercising Test Frequency, states, in part, that “Active Category A, Category B, and Category C check valves shall be exercised nominally every 3 months.”

ISTC-3540, Manual Valves, states, in part, that “Manual Valves shall be full-stroke exercised at least once every 2 years, except where adverse conditions may require the valve to be tested more frequently to ensure operational readiness.”

ISTC-3630, Leakage Rate for Other Than Containment Isolation Valves, (a) *Frequency*, states, “Tests shall be conducted at least once every 2 years.”

ISTC-3700, Position Verification Testing, states, in part, that “Valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve operation is accurately indicated.”

REQUIREMENTS: (continued)

ISTC-5221, Valve Obturator Movement, (c)(3) states, "At least one valve from each group shall be disassembled and examined at each refueling outage; all valves in each group shall be disassembled and examined at least once every 8 years."

Mandatory Appendices:

Appendix I, Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants, I-1320, Test Frequencies, Class 1 Pressure Relief Valves, (a) *5-Year Test Interval*, states, in part, that "Class 1 pressure relief valves shall be tested at least once every 5 years."

Appendix I, I-1330, Test Frequency, Class 1 Nonreclosing Pressure Relief Devices, states, in part, that "Class 1 nonreclosing pressure relief devices shall be replaced every 5 years."

Appendix I, I-1340, Test Frequency, Class 1 Pressure Relief Valves that are used for Thermal Relief Application, states, "Tests shall be performed in accordance with I-1320, Test Frequencies, Class 1 Pressure Relief Valves."

Appendix I, I-1350, Test Frequency, Classes 2 and 3 Pressure Relief Valves, (a) *10-Year Test Interval*, states, in part, that "Classes 2 and 3 pressure relief valves, with the exception of PWR main steam safety valves, shall be tested every 10 years."

Appendix I, I-1360, Test Frequency, Classes 2 and 3 Nonreclosing Pressure Relief Devices, states, in part, that "Classes 2 and 3 nonreclosing pressure relief devices shall be replaced every 5 years."

Appendix I, I-1370, Test Frequency, Classes 2 and 3 Primary Containment Vacuum Relief Valves, states, in part, that "(a) Tests shall be performed on all Classes 2 and 3 containment vacuum relief valves at each refueling outage or every 2 years, whichever is sooner."

Appendix I, I-1380, Test Frequency, Classes 2 and 3 Vacuum Relief Valves, Except for Primary Containment Vacuum Relief Valves, states, in part, that "All Classes 2 and 3 vacuum relief valves shall be tested every 2 years."

Appendix I, I-1390, Test Frequency, Classes 2 and 3 Pressure Relief Devices That Are Used for Thermal Relief Application, states, in part, that "Tests shall be performed on all Classes 2 and 3 relief devices used in thermal relief application every 10 years."

REQUIREMENTS: (continued)

Appendix II, Check Valve Condition Monitoring Program, II-4000, Condition-Monitoring Activities, (a) *Performance Improvement Activities*, (1) states, in part, that "If sufficient information is not currently available to complete the analysis required in II-3000, … then the following activities shall be performed at sufficient intervals over an interim period of the next 5 years or two refueling outages, whichever is less, to determine the cause of the failure or the maintenance patterns."

Appendix II, II-4000, (b), *Optimization of Condition-Monitoring Activities*, Subparagraph (1)(e) states, in part, "Identify the interval for each activity."

REASON FOR REQUEST:

Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (z)(2), an alternative is proposed to the frequency specifications of the ASME OM Code. The basis of this request is that the Code requirements present an undue hardship without a compensating increase in the level of quality or safety.

This alternative is a re-submittal of NRC approved 3rd interval WF3-RR-2016-1, which was based on the ASME OM Code-2001 Edition through the OMb 2003 Addenda. This 4th interval alternative request is based on the ASME OM Code 2004 Code Edition through OMb 2006 Addenda. There have been no substantive changes to this alternative, to the OM Code requirements or to the basis for use, which would alter the previous NRC Safety Evaluation conclusions.

The ASME OM Code Section IST establishes the inservice test frequencies for all components within the scope of the Code. The frequencies (e.g., quarterly) have always been interpreted as "nominal" frequencies (generally as defined in Table 3.2 of NUREG 1482, Revision 2) and Owners routinely applied the surveillance extension time period (i.e., grace period) contained in the plant Technical Specifications (TS) Surveillance Requirements (SRs). The TS typically allow for a less than or equal to 25 percent extension of the surveillance test interval to accommodate plant conditions that may not be suitable for conducting the surveillance (SR 4.0.2). However, regulatory issues have been raised concerning the applicability of the TS "Grace Period" to ASME OM Code-required IST frequencies irrespective of allowances provided under TS Administrative Controls (i.e., TS 6.5.8, "Inservice Testing Program," invokes SR 4.0.2 for various OM Code frequencies of 2 years or less).

The lack of a tolerance band on the ASME OM Code IST frequencies restricts operational flexibility. There may be a conflict where a surveillance test is required (i.e., its frequency could expire), but where it is not possible or not desired that the test be performed until sometime after a plant condition or associated Limiting Condition for Operation (LCO) is within its applicability. Therefore, to avoid this conflict, the surveillance test should be performed when plant conditions allow (i.e., when it can and should be performed).

REASON FOR REQUEST: (continued)

The NRC recognized this potential issue in the TS by allowing a frequency tolerance as described in TS SR 4.0.2. The lack of a similar tolerance applied to the ASME OM Code testing places an unusual hardship on the plant to adequately schedule work tasks without operational flexibility.

Thus, just as with TS-required surveillance testing, some tolerance is needed to allow adjusting ASME OM Code testing intervals to suit the plant conditions and other maintenance and testing activities. This assures operational flexibility when scheduling surveillance tests that would minimize the conflicts between the need to complete the testing and plant conditions.

PROPOSED ALTERNATIVE AND BASIS:

WF3 proposes the use of the allowance of grace as stipulated in ASME OM Code Case OMN-20, Inservice Test Frequency, for flexibility in IST scheduling for applicable Code requirements noted in "Requirements" above.

The ASME OM Code specifies component test frequencies that are based either on elapsed time periods (e.g., quarterly, 2 years, etc.) or on the occurrence of plant conditions or events (e.g., cold shutdown, refueling outage, upon detection of a sample failure, following maintenance, etc.).

(a) Components, whose test frequencies are based on elapsed time periods, shall be tested at the frequencies specified in OM Code Section IST with a specified time period between tests as shown in Table 1. The specified time period between tests may be reduced or extended as follows:

(1) For periods specified as fewer than 2 years, the period may be extended by up to 25% for any given test.

(2) For periods specified as greater than or equal to 2 years, the period may be extended by up to 6 months for any given test.

(3) All periods specified may be reduced at the discretion of the Owner (i.e., there is no minimum period requirement).

Table 1
Specified Test Frequencies

Frequency	Specified Time Period Between Tests
Quarterly (or every 3 months)	92 Days
Semiannually (or every 6 months)	184 Days
Annually (or every year)	366 Days
x Years	x calendar years Where 'x' is a whole number of years ≥ 2

PROPOSED ALTERNATIVE AND BASIS: (continued)

Period extension is used 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.

Period extensions may also be applied to accelerated test frequencies (e.g., pumps in Alert Range) and other fewer than two-year test frequencies not specified in Table 1.

Period extensions may not be applied to the test frequency requirements specified in Subsection ISTD, Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants, as Subsection ISTD contains its own rules for period extensions.

(b) Components whose test frequencies are based on the occurrence of plant conditions or events (e.g., cold shutdown, refueling outage, upon detection of a sample failure, following maintenance, etc.) may not have their period between tests extended except as allowed by the ASME OM Code.

This alternative is requested citing the above guidance found in ASME-approved Code Case OMN-20 for determining acceptable tolerances for pump and valve test frequencies. The ASME OM Code Standards Committee approved this Code Case in February 2012. Code Case OMN-20 was subsequently published in conjunction with the ASME OM Code, 2012 Edition.

In conclusion, as currently written, the ASME OM Code requirements do not allow testing period extensions that provide an allowance for operational flexibility for the performance of ASME OM Code testing. As a result, this places a hardship on the ability for WF3 to schedule and perform ASME OM Code testing without a compensating increase in level of quality and safety. Using the provisions of this request as an alternative to the specific frequency requirements of the OM Code identified above will provide operational flexibility and still continue to provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(z)(2), WF3 requests approval of the alternative, which is consistent with ASME-approved Code Case OMN-20, to the specific ASME OM Code frequency requirements identified in this request.

DURATION: 4th IST Interval, December 1, 2017, through November 30, 2027

PRECEDENTS: Similar requests were approved for the following utilities:

1. Waterford Steam Electric Station, Unit 3, Request for Alternative to the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants Regarding Inservice Test Frequency (WF3-RR-2016-1), dated December 9, 2016 (ML16235A228)

2. Byron Station, Unit Nos. 1 and 2 – Relief [RG-1] from the Requirements of the ASME Code, dated February 26, 2016 (ML16022A135)

3. Fort Calhoun Station, Unit No. 1 – Requests for Relief G-1, P-1 and P-2 for the Fifth Inservice Testing Interval, dated February 19, 2016 (ML16041A308)

4. Callaway Plant, Unit 1 – Requests for Relief [PR-04], Alternatives to ASME OM Code Requirements for Inservice Testing for the Fourth Program Interval, dated July 15, 2014 (ML14178A769)

5. Dresden Nuclear Power Station, Units 2 and 3 – Safety Evaluation in Support of Request for Reliefs [RR RV-01] Associated with the Fifth 10-Year Interval Inservice Testing Program, dated October 31, 2013 (ML13297A515)

6. Quad Cities Nuclear Power Station, Units 1 and 2 – Safety Evaluation in Support of Request for Relief [RV-01] Associated with the Fifth 10-Year Interval Inservice Testing Program, dated February 14, 2013 (ML13042A348)

REFERENCES:

1. NRC Regulatory Issue Summary 2012-10, NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests

2. ASME OM Code Case OMN-20, Inservice Test Frequency

3. WF3 Technical Specifications

4. NUREG 1482, Revision 2, Guidelines for Inservice Testing at Nuclear Power Plants: Inservice Testing of Pumps and Valves and Inservice Examination and Testing of Dynamic Restraints (Snubbers) at Nuclear Power Plants, Table 3.2, ASME OM Code Terms for Inservice Testing Activities, dated October 2013 (ML13295A020)