Entergy Operations, Inc.
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GNRO-2017/00040

June 28, 2017

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: Request to use a later Edition and Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, for Repair / Replacement Activities at Grand Gulf Nuclear Station, Unit 1 in Accordance with 10CFR50.55a(g)(4)(iv)
Grand Gulf Nuclear Station – Unit 1
Docket No. 50-416
License No. NPF-29

Dear Sir or Madam:

Pursuant to 10 Code of Federal Regulations (CFR) 50.55a(g)(4)(iv), and in accordance with the guidance of Regulatory Issue Summary (RIS) 2004-12, Entergy hereby requests to use a later Edition and Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, for repair / replacement activities for Grand Gulf Nuclear Station (GGNS) Inservice Inspection (ISI) Program. This request is needed to support the third 10-year ISI interval. The details of the 10 CFR 50.55a request is provided in Attachment 1.

Entergy request NRC Staff review and approval of this proposed GGNS Request (GG-ISI-022) no later than March 14, 2018, which is in advance of our RF21. The duration of this request will be for the Third 10-Year ISI Interval scheduled to be completed by November 30, 2017.

There are no regulatory commitments made in this submittal. If you have any questions or require additional information, please contact James Nadeau at 601-437-2103.

This letter contains no new Regulatory Commitments.

Should you have any questions concerning the content of this letter, please contact James Nadeau at 601-437-2103.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 28, 2017.

Sincerely,

JJN/amh

Attachment 1: Request to use a later Edition and Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, for Repair / Replacement Activities at Grand Gulf Nuclear Station, Unit 1 in Accordance with 10CFR50.55a(g)(4)(iv)

cc: with Attachment

Mr. John P. Boska, Project Manager
Plant Licensing Branch 1-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 0-8-C2
Washington, DC 20555

cc: without Attachment

Mr. Kriss M. Kennedy
U.S. Nuclear Regulatory Commission
Regional Administrator, Region IV
1600 East Lamar Boulevard
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Mr. Siva Lingham
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NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

Dr. Mary Currier, M.D., M.P.H
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Attachment 1 to GNRO-2017/00040

Request to use a later Edition and Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, for Repair / Replacement Activities at Grand Gulf Nuclear Station, Unit 1 in Accordance with 10CFR50.55a(g)(4)(iv)

ENTERGY OPERATIONS, INC.

GRAND GULF NUCLEAR STATION – UNIT 1
REQUEST No. GG-ISI-022 IN ACCORDANCE WITH
10 CFR 50.55a(g)(4)(iv) FOR INSERVICE INSPECTION ITEMS

Pursuant to 10 CFR 50.55a(g)(4)(iv) and in accordance with the guidance of Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," Reference 1, Grand Gulf Nuclear Station, Unit 1, (GGNS) requests NRC approval to utilize the 2007 Edition through the 2008 Addenda of the American Society of Mechanical Engineers (ASME) Code, Section XI, Reference 2, for Examination Category C-G Items as defined below.

1. ASME Code Components Affected

Code Class:	2
References:	ASME Section XI, 2001 Edition through the 2003 Addenda, Table IWC-2500-1 – "Code of Record", Reference 3
Examination Category:	C-G
Item Numbers:	C6.10 and C6.20
Description:	Pump Casing Welds and Valve Body Welds
Unit / Inspection Interval Applicability:	Grand Gulf Nuclear Station, Unit 1 / Third 10-Year Inservice Inspection (ISI) Interval May 31, 2008 – November 30, 2017

2. Applicable Code Edition and Addenda

The Code of Record for the current Third 10-Year ISI Interval at GGNS is ASME Section XI, 2001 Edition through the 2003 Addenda. This Code of Record is applicable to the Examination Category C-G welds, for which the use of a subsequent ASME Code Edition and Addenda is being requested.

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

A. Background

In accordance with the 10-year update requirements of 10 CFR 50.55a(g)(4)(ii), ASME Section XI ISI activities at GGNS were initially updated for the Third 10-

Year ISI Interval to the 2001 Edition through the 2003 Addenda, with an implementation date of May 31, 2008.

B. Proposed Use of Subsequent Code Edition and Addenda

The subsequent Code edition and addenda proposed for the GGNS ISI Program, Examination Category C-G, is ASME Section XI, 2007 Edition through the 2008 Addenda. In the 2008 Addenda, Examination Category C-G was deleted from the Code.

In the 2001 Edition through the 2003 Addenda of ASME Section XI:

- Category C-G requires a surface examination of pump casing welds and valve body welds in all components in each piping run examined under Examination Category C-F.

ASME Examination Category C-G welds were removed in the ASME Section XI, 2007 Edition through the 2008 Addenda because experience has not identified any failures in pump casing or valve body welds. The requirements for performing these examinations of the pump casing welds and valve body welds resulted in unnecessary radiation exposure for Nondestructive Examination personnel.

For Class 2 welds in pump casings and valve bodies, any degradation of the pump or valve interior will be detected by the mechanic working on the component internals. Through-wall leakage will be detected by the Visual VT-2 examinations during the system pressure tests.

The subsequent Code edition and addenda proposed under this request is the ASME Section XI, 2007 Edition through the 2008 Addenda, for Examination Category C-G. The 2008 Addenda of Section XI has been incorporated into the regulations by reference in (a)(1)(ii), as published in the Federal Register on June 21, 2011 (76 FR 36232), and became effective July 21, 2011. Furthermore, 10 CFR 50.55a(b) contains no conditions or provisions that pertain to Examination Category C-G items in the 2007 Edition through the 2008 Addenda of ASME Section XI.

4. Related Requirements

For the portion of the subsequent Code edition and addenda to be used, no related requirements would need to be implemented since the 2008 Addenda deletes Examination Category C-G from the Code.

5. Duration of Proposed Request

The duration of this request will be for the GGNS Third 10-Year ISI Interval scheduled to be completed by November 30, 2017.

6. Precedents

(1) NRC Safety Evaluation Report (SER) – Nine Mile Point Nuclear Station, Unit Nos. 1 and 2- RE: Request for Approval to Use a Later ASME Code Section XI Edition and Addenda for Examination Categories B-L-1, B-M-1, AND C-G, (TAC NOS. MF1316 AND MF1317), Dated: March 14, 2014, [ADAMS Accession No. ML14064A339]

(2) NRC Safety Evaluation Report (SER) – Palo Verde Nuclear Generating Station, Units 1, 2, and 3 Request for Relief to Use a Later Edition of ASME Code, Section XI, for Examination Categories B-L-1, B-M-1, AND C-G (TAC NOS. ME7B05, ME7B06. AND ME7B07), Dated: September 18, 2012, [ADAMS Accession ML12257A141]

7. References

1. Regulatory Issue Summary (RIS) 2004-12 "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI"

2. ASME Code Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components, Division 1, 2007 Edition through the 2008 Addenda

3. ASME Code Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components, Division 1, 2001 Edition through the 2003 Addenda