



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 24, 2018

Mr. William F. Maguire
Site Vice President
River Bend Station, Unit 1
Entergy Operations, Inc.
5485 U.S. Highway 61 N
St. Francisville, LA 70775

SUBJECT: SUMMARY OF PUBLIC TELEPHONE CONFERENCE CALL HELD ON MARCH 29, 2018, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND ENTERGY REGARDING THE NEED FOR ADDITIONAL INFORMATION TO SUPPORT THE RIVER BEND STATION, UNIT 1 LICENSE RENEWAL APPLICATION REVIEW (CAC NO. MF9757)

Dear Mr. Maguire:

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Entergy Operations, Inc. (the applicant) held a public telephone conference call on March 29, 2018, to discuss the applicant's claim of consistency with NUREG-1801 Section XI. S8 "Protective Coating Monitoring and Maintenance Program" in its License Renewal Application, Section A.1.35 "Protective Coating Monitoring and Maintenance." The telephone conference was held at the request of NRC to clarify the applicant's statement in its application.

Enclosure 1 provides a listing of the participants and Enclosure 2 includes a summary of the conference call. The applicant had an opportunity to comment on this summary.

Dave Lach of your staff agreed to provide a supplement within 30 days of the date of the call. If you have any questions, please contact me by telephone at 301-415-4084 or via e-mail at Emmanuel.Sayoc@nrc.gov.

Sincerely,

/RA Albert Wong for/

Emmanuel Sayoc, Project Manager
License Renewal Project Branch
Division of Materials and License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-458

Enclosures:

1. List of Participants
2. Summary of the Telephone Call

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DATE	04/23/2018	04/23/2018	04/23/2018	04/24/2018

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**LIST OF PARTICIPANTS FOR THE MARCH 29, 2018
TELEPHONE CONFERENCE CALL**

PARTICIPANTS

AFFILIATIONS

Steve Bloom	U.S. Nuclear Regulatory Commission (NRC)
Matt Yoder	NRC
Alexander Chereskin	NRC
Emmanuel Sayoc	NRC
Albert Wong	NRC
Alan Cox	Entergy Nuclear Operations Inc. (Entergy)
Dave Lach	Entergy
Mark Spinelli	Entergy
Alyson Coates	Entergy
Herb Rideout	Entergy
Jim Morgan	Entergy
Randy Gauthreaux	Entergy
Lisa Borel	Entergy
Mark Sandusky	Entergy
Mike Cooper	Entergy

SUMMARY OF THE MARCH 29, 2018 TELEPHONE CALL

BACKGROUND

NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," identifies aging management programs (AMP) that are deemed acceptable to manage aging effects on systems, structures, and components in the scope of license renewal, as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54, "Requirements for Renewal of Operating License for Nuclear Power Plants." AMP XI.S8 "Protective Coating Monitoring and Maintenance Program in NUREG-1801 states that NRC Regulatory Guide (RG) 1.54, Rev. 2, "Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants," describes an acceptable technical basis for a Service Level I coating monitoring and maintenance program that can be credited for managing the effects of corrosion for carbon steel elements inside containment. Additionally, NUREG-1800, Rev. 2 "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" Table 3.0-1 "FSAR Supplement for Aging Management of Applicable Systems" for XI.S8 states that the program is implemented in accordance with RG 1.54, Rev. 1 or latest revision.

ISSUE

The River Bend Station License Renewal Application A.1.35 "Protective Coating Monitoring and Maintenance" AMP states that the program is implemented using the guidance provided in American Society for Testing of Materials (ASTM) D 5163-08, "Standard Guide for Establishing a Program for Condition Assessment of Coating Service Level I Coating Systems in Nuclear Power Plants." B.1.35 of the application states that the Protective Coating Monitoring and Maintenance Program is consistent with the program described in NUREG-1801, Section XI.S8, Protective Coating Monitoring and Maintenance Program.

DISCUSSION

The staff inquired about the applicant's basis for claiming consistency with the GALL Report without explicitly referencing RG 1.54 in its A.1.35 AMP or B.1.35 AMP activities. The applicant stated that the basis for the consistency with the GALL program stemmed from the facts that comparison with ten elements of NUREG-1801 Section XI.S8 was performed without the need to reference RG 1.54 because the Section XI.S8 program elements refer directly to ASTM D 5163 provisions. In addition, RG 1.54, Rev. 2 points back to ASTM D 5163-08 as a document providing guidelines that the NRC staff finds acceptable for establishing an in-service coating monitoring program for Service Level I coating systems in operating nuclear power plants. Although the staff agrees that ASTM D 5163 is the primary standard for addressing condition assessment of Service Level I coatings, RG 1.54 provides additional guidance including conditions for the use of ASTM D 5163. If a licensee chooses not to cite RG 1.54, they should provide adequate justification to demonstrate that their AMP will provide reasonable assurance of adequate management of the aging effects for Service Level I coatings, consistent with the expectations of GALL AMP XI.S8.

The licensee stated that a supplement to the license renewal application will be made with adequate justification that their AMP will provide reasonable assurance of adequate management of the aging effects for Service Level I coatings, consistent with NUREG-1801 Section XI.S8.