



ENTERGY

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Director

Nuclear Safety & Regulatory Affairs

April 14, 1994

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Proposed Alternative to 10CFR 50.55a(f) and (g)
Extension of 120 Month Periods

Arkansas Nuclear One Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6

Grand Gulf Nuclear Station Unit 1
Docket No. 50-416
License No. NPF-29

Waterford 3 Steam Electric Station
Docket No. 50-382
License No. NPF-38

GNRO: 94/00061

Gentlemen:

As you know, three of our Entergy Operations facilities (Arkansas Nuclear One, Grand Gulf and Waterford 3) have a request pending your review which proposes an alternative approach to the 10 year ASME code update requirements of 10CFR50.55a.

Since submitting our request in November, 1993, we have had several interactions with the Staff. Most recently we have had quite constructive discussions concerning the potential to approach our request as a plant-specific and generic industry effort. In this regard, we have set up a meeting on April 18 with NRC, Entergy Operations and the Nuclear Energy Institute (NEI) to further explore the potential for generic relief and plant-specific review.

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We believe that efforts of this nature have positive benefits for the industry and the NRC Staff. We are particularly pleased with the effective use of this kind of approach in dealing with our Appendix J exemption request on integrated and local leak rate testing. In that case, the industry (through NEI) and the NRC are developing guidance to support rulemaking while the Staff is processing the Grand Gulf exemption request to serve as a pilot application of a performance based program. A similar approach on 10CFR50.55a is both desirable and achievable.

While we need to encourage and support efforts of this nature, we also must remain mindful of the purpose behind our original request. Entergy Operations had requested NRC approval of our 10CFR50.55a alternative by January, 1994 because each of the participating EOI sites was shortly scheduled to begin resource-intensive efforts for their 10 year ASME code updates. Given the ending dates of our sites' 10 year periods, extended delay in review and approval of our request would effectively negate much of the benefit of the proposed alternative.

Because the addition of a generic approach to our request will, by necessity, expand the review period, Entergy Operations requests Staff approval of an extension to the current 10 year period for our affected plants, as follows:

<u>Plant</u>	<u>Current End of 10 Year Period</u>	<u>Requested End Date For 10 Year Period</u>
ANO Unit 1	12-19-94	12-01-96
Grand Gulf	07-01-95	01-01-97
Waterford 3	09-24-95	07-01-97

The requested extension has the net effect of including an additional refueling outage beyond that planned for the current 10 year period for each plant. With this relief, we will be able to suspend certain of our current activities devoted to evaluating selected areas of the updated ASME code which add additional burden without a commensurate safety benefit.

This request is made under 10CFR50.55a(a)(3) which allows NRC to authorize alternatives to selected requirements contained in 10CFR50.55a. Specifically, we are requesting extension of the present 120 month ISI/T period to a length corresponding to the dates shown above. This request is independent of any period extensions allowed under the ASME code and would include continuation of existing approved reliefs through the end of the extended period. We understand that approval of our request would also imply shortening of a subsequent 120 month period if the licensed plant lifetime was not also extended. The choice of which subsequent period to shorten (if any) would be at the option of the individual plants.

The proposed extensions would provide an acceptable level of quality and safety for the following reasons:

- Each EOI facility currently operates under acceptable (albeit earlier) ASME code requirements. Implementation of these code requirements provide an acceptable level of quality and safety.
- ASME code changes which constitute a substantial safety benefit (e.g., augmented examination of the reactor vessel) are separately addressed by rulemaking (e.g., 50.55a(g)(6)(ii)(A)) and are unaffected by the proposed extension to the 120 month period.
- During the extended period, should an affected EOI facility identify a code change from a later approved code edition which is of substantial safety benefit and is not addressed through rulemaking, that change will be implemented at the earliest opportunity commensurate with its importance to safety.

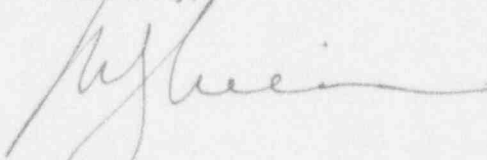
Failure to extend the current 120 month periods would result in hardship or unusual difficulty without a compensating increase in the the level of quality and safety for the following reason:

- Each of the affected EOI plants is proceeding to prepare its 10 year ASME code update which would include, if approved, application of the proposed alternative to 10CFR50.55a in determining if code changes which add burden are cost-beneficial. Those changes which add cost in excess of safety benefit would likely not be implemented.

By reallocating NRC review resources to a joint plant-specific and generic effort, the time needed for review of the EOI alternative request would necessarily be extended. Because of the impending end dates for our 120 month periods, the extended NRC review of the proposed alternative would result in EOI forfeiting any benefit for the next 120 month period. Extending the current period would preserve the potential benefit.

In order to minimize effects on our ongoing programs, we would appreciate your expedited review and response to this request. We would be happy to provide any additional information that would be useful in facilitating your review.

Yours truly,



M.J.M/be

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