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October 6, 1995

0CAN109504

U. S. Nuclear Regulatory Commission Document Control Desk Mail Station P1-137 Washington, DC 20555

Subject: Use of ASME Code Case N-532

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

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

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

River Bend Station Docket No. 50-458 License No. NPF-47

Gentlemen:

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The purpose of this submittal is to request approval, pursuant to 10CFR50.55a(a)(3), for the use of the American Society of Mechanical Engineers (ASME) Code Case N-532 as an alternative to the ASME Section XI Code requirements in effect at all of Entergy Operations' nuclear units, i.e., Arkansas Nuclear One, Units 1 and 2 (ANO), Grand Gulf Nuclear Station, Waterford 3 Steam Electric Station, and River Bend Station. Code Case N-532 was approved for use on December 12, 1994, by the ASME Board of Nuclear Codes and Standards and is included in the Nuclear Code Case Book for the 1995 edition of the Code. This code case has not yet been added to the approved list of code cases included in NRC Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability -ASME Section XI Division 1."

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Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000," provides an alternative to the specific code requirements of IWA-4910(d), IWA-6210(c), (d), and (e), IWA-6220, IWA-6230(b), (c), (d), and IWA-6420(b). Use of this alternative would provide a significant reduction in the administrative burden associated with the preparation and submittal of more than 100 NIS-2 forms after each outage following repairs and or replacements of components and for the preparation and submittal of the inservice inspection summary report and Form NIS-1 within 90 days after each refueling outage.

By use of this code case, the following would be attached to an Owner's Activity Report Form OAR-1 upon completion of each refueling outage: 1) an abstract of all examinations and tests completed each refueling outage, 2) a listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service, and 3) an abstract for repairs, replacements, and corrective measures performed due to an item containing a flaw or relevant condition that exceeded acceptance criteria. Each Form OAR-1 prepared during an inspection period would be available onsite for the NRC's review. All OAR-1 forms generated during an inspection period would be compiled and subsequently submitted following the end of an inspection period.

Approval for use of this code case is requested by December 15, 1995, in order to minimize the administrative burden associated with preparing outage summary reports and NIS-2 forms for the refueling outages currently in progress at both ANO-2 and Waterford 3 and for subsequent submittals from ANO-1, Grand Gulf and River Bend.

Should you have any questions regarding this submittal, please contact me.

Very truly yours,

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Dwight C. Mims Director, Licensing

DCM/jjd

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