



ENTERGY

Entergy Operations, Inc.
1448 S.R. 333
Russellville, AR 72801
Tel 501 858-5000

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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Additional Information In Response To Generic Letter 95-03
(TAC Nos. M92220 and M92221)

Gentlemen:

On April 28, 1995, the NRC Staff issued Generic Letter (GL) 95-03, "Circumferential Cracking of Steam Generator Tubes," which requested addressees to evaluate recent operating experience related to circumferential cracking, justify continued operation until the next scheduled steam generator tube inspections and to develop plans for the next steam generator tube inspections. Entergy Operations submitted a response to this GL for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), on June 17, 1995 (0CAN069508). On September 12, 1995, the Staff issued a request for additional information concerning our response to GL 95-03. Subsequent discussions with the Staff identified an additional question to be addressed. The requested items are addressed in the attachments to this letter for ANO-1 and ANO-2 respectively.

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

Very truly yours,

Dwight C. Mims
Director, Licensing

DCM/jjd

attachments

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9510170385 951012
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ADD 1

cc: Mr. Leonard J. Callan
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Arkansas Nuclear One
P.O. Box 310
London, AR 72847

Mr. George Kalman
NRR Project Manager Region IV/ANO-1 & 2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Attachment 1

Arkansas Nuclear One - Unit 1 Response to Generic Letter 95-03 Request for Additional Information

1. **"Discuss the design differences between the ANO-1 steam generators and the generic design information provided in the B&W Owners Group response, if any."**

The design characteristics of the ANO-1 steam generators are the same as the generic design information provided in the B&W Owners Group response with one exception: 1,623 of the 15,531 holes in the 15th tube support plate (TSP) are drilled, not broached.

2. **Dented Regions Including Dented Tube Support Plates**

"In the Electric Power Research Institute (EPRI) report NP-6201 "PWR Steam Generator Examination Guidelines: Revision 3", dated November 1992, it indicated that B&W plants have experienced denting at tube support plates and in the lower tubesheet. Circumferential indications have been observed at dented areas in recirculating steam generators. If denting has been observed at ANO-1 and it is a location susceptible to circumferential cracking, please submit the information requested in Generic Letter (GL) 95-03 per the guidance contained in the GL. If voltage threshold is used for determining the threshold for examining dents, provide the calibration procedure used (e.g., 4.0 volts on 4-20% through-wall ASME holes at 550/130 mix)."

"EPRI report NP-6201 indicates that the fifteenth tube support plate contains both broached holes and drilled holes. The drilled holes being prone to denting. Please clarify whether all of the tube support plates are of the broached hole design or whether a number of them contain drilled holes. Discuss whether denting has been limited to drilled hole locations, if applicable, or if it has been observed at other support plate intersections (i.e., broached holes)."

Tube diameter reduction (called "dings" in once through steam generators [OTSGs] to distinguish them from the more severe classical denting observed in recirculating steam generators [RSGs]) is most prevalent at the secondary face of the upper and lower tubesheets. Although not as common, dings have also been detected throughout the tube bundle at TSP locations.

Outside diameter (OD) volumetric degradation has been detected in dings and is thought to be caused by corrosion or wear. Secondary side intergranular attack (IGA) in dings has been detected at the upper tubesheet face. This degradation is not considered to be strongly related to the presence of dings since the IGA is prevalent throughout the upper tubesheet crevice away from ding indications.

During the ANO-1 11th refueling outage (IR11), two (2) dings at the upper tubesheet interface were identified during the bobbin inspection as having anomalous signals. These indications were further inspected with a motorized rotating pancake coil (MRPC), and determined to be volumetric flaws with circumferentially oriented "crack-like" indications present. These indications are addressed in Entergy Operations' letter to the NRC dated November 12, 1993 (1CAN119306), "Once Through Steam Generator (OTSG) Inservice Inspection Report." The tubes containing these indications were removed from service by plugging.

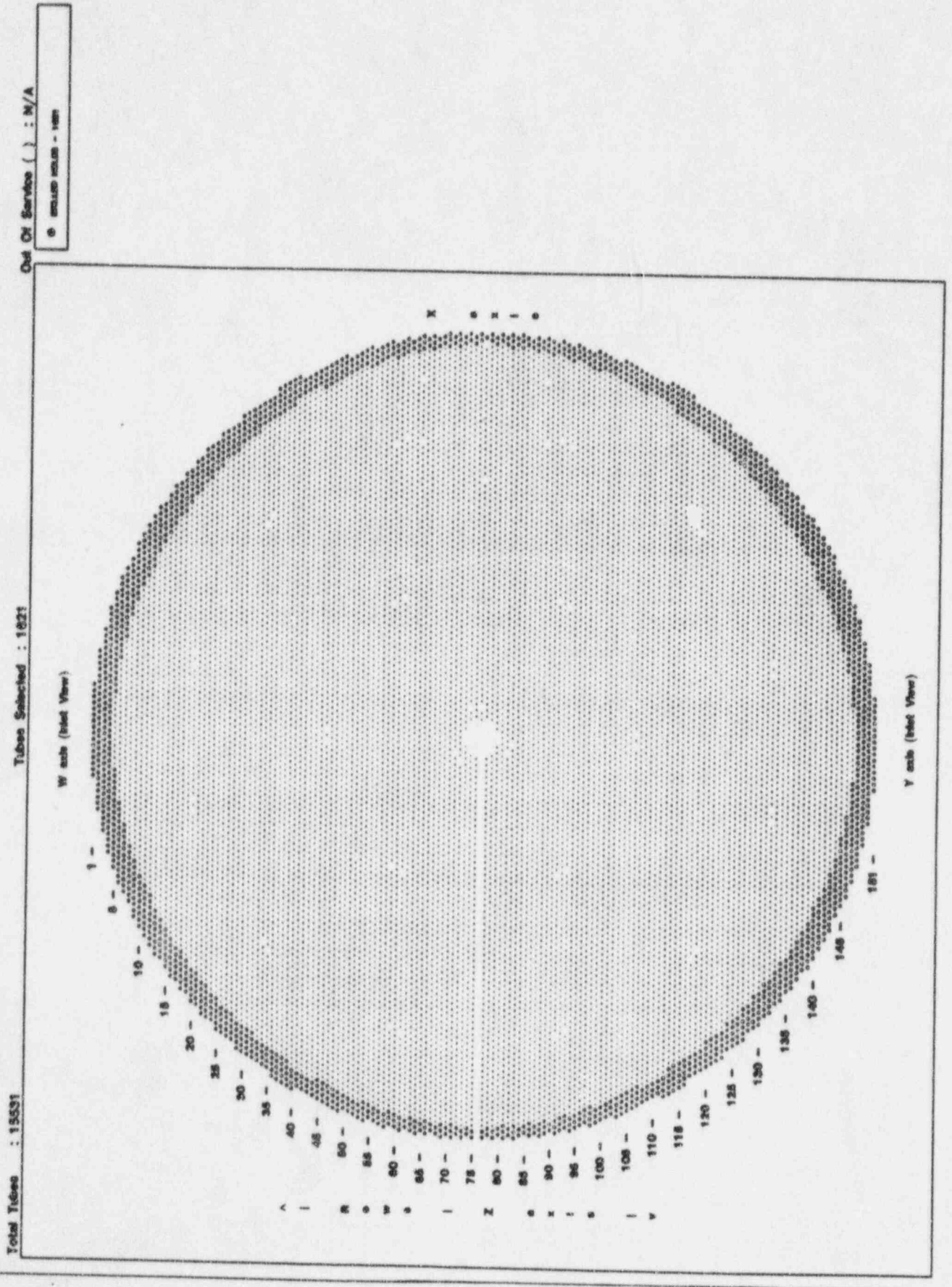
Entergy Operations considers dings in the OTSGs to be a possible area of susceptibility to circumferential cracking based on the associated increase in stress levels within the tubing. Therefore, a response to the requested information in Generic Letter 95-03 is provided as Appendix 1A to this attachment.

A voltage threshold is not used for determining the threshold for examining dings in the ANO-1 OTSGs.

The 15th TSPs within the ANO-1 steam generators contain both broached and drilled holes. The outer tube locations in the 15th TSP are drilled to a 0.637" minimum/0.646" maximum diameter. 1623 locations are drilled per steam generator as identified in Figure 1. All remaining tube locations within the 15th TSP and all other TSPs are of the broached hole design.

Dings have been detected at both the 15th TSP drilled holes and broached holes. Based upon previous inspection data there does not appear to be a significant preference for the occurrence of dings in the drilled hole locations over the broached hole locations. Growth of observed dings in the OTSGs has been insignificant.

FIGURE 1
DRILLED HOLES IN THE 15TH TSP



3. **Expansion Transition Examinations**

“Provide the number of tubes currently in service that were re-rolled after the furnace stress relief.”

“Clarify the inspections performed during the last outage at the expansion transition region. Address the probe used and the number of tubes inspected.”

“Provide the criteria to be used for determining whether expansion of the inspections for expansion transition indications is necessary.”

Two (2) tubes in the SG “A” upper tube sheet (UTS), seven (7) tubes in the SG “A” lower tube sheet (LTS) and four (4) tubes in the SG “B” LTS were re-rolled after the furnace stress relief.

During the last refueling outage 3406 and 4303 tubes were examined full length using the 0.510” bobbin coil probe for SGs “A” and “B,” respectively. An additional 3488 and 3302 tubes in the wedge region (described in ANO-1 Technical Specification 4.18.3.a.3(3) and Figure 4.18.1) were inspected using the 0.510” bobbin coil probe from the 15th TSP to upper tube end (UTE) for SGs “A” and “B,” respectively.

As specified in the B&W Owners Group generic response to GL 95-03, all non-stress relieved roll transitions will be examined during the next scheduled inspection using a technique qualified for detection of circumferential cracking per EPRI Report NP-6201, Appendix H. This examination will be focused on the non-stress relieved roll transitions since the susceptibility of the remainder of the transitions has been reduced by the full bundle stress relief. Should a repairable indication be found, the criteria to be used to evaluate the need for expansion will be based upon engineering analysis of physical parameters within the OTSGs that affect the tubing. Those parameters would include tube loading variations and temperature. Other criteria to be evaluated would include indication size, quantity and location within the OTSG.

4. **Lane/Wedge Region**

“Clarify the inspection scope in the lane/wedge region during the last steam generator tube inspections (including the probe type and number, ((and/or percentage)) of tubes inspected).”

“Provide the criteria to be used for determining whether the expanded inspection scope around any identified indications adjacent to the sleeved lane/wedge region is bounded.”

The 0.510" bobbin coil probe was used to inspect all inservice tubes within the lane/wedge. In the lane region, as defined by ANO-1 Technical Specification 4.18.3.a.3.(1), 306 and 354 tubes were inspected full length in SGs "A" and "B," respectively. In the wedge region, as defined by ANO-1 Technical Specification 4.18.3.a.3.(3), 3488 and 3302 tubes were inspected from the 15th TSP to the UTE in SGs "A" and "B," respectively.

The Plus Point probe was used to inspect all inservice I-600 sleeve roll transitions. Ninety-four (94) and eighty-four (84) sleeve roll transitions were inspected within the SG "A" and "B" lane/wedge regions, respectively.

As stated within the B&W Owners Group generic response to GL 95-03, a one-tube wide border of inservice unsleeved tubes around the lane/wedge region of sleeved tubes will be examined to confirm that the sleeved region is still adequately bounded. If circumferential cracks are detected in this border, the sample will be expanded to bound the degraded region. Selection of specific additional tubes to be inspected will be based on an engineering evaluation of the location of the degraded tube and the thermal/hydraulic conditions believed to be responsible for the fatigue failures. For example, a detection of cracking in a tube near the periphery in the wedge region will be addressed by expanding the inspection in the wedge region on both sides of the lane. Detection of circumferential cracking along the lane further toward the center of the bundle will be addressed by extending the inspection around the bundle center outside of the lane/wedge region, and/or inspecting an additional row on either side of the lane.

5. **"Recently, several tubes have been pulled from B&W once through steam generators (OTSGs). Discuss any analysis performed on OTSG pulled tubes for monitoring the development of circumferential cracking. For example, discuss the destructive and non-destructive examinations performed on these pulled tubes in the laboratory at the expansion transition area."**

During the late 1970s and the early 1980s tubes were pulled from the Oconee plants to investigate the cause of tube leaks observed at locations near the un-tubed lane. Laboratory results from these tube pulls confirmed the leaks were due to circumferential cracking caused by corrosion assisted high-cycle fatigue. These failures were addressed by sleeving the area as discussed in the B&W Owners Group generic response to GL 95-03.

Recent tube pulls from Crystal River - 3 (1992 and 1994) and Oconee - 1 (1994) have been performed to determine the cause of eddy current indications that were observed in areas of the OTSG where the damage mechanisms are not well understood. These include both freespan and TSP indications, primarily in the boiling region of the OTSG. The tubesheet expansion transition region was not an area of interest due to lack of observed degradation in this area, and was drilled

out during the removal process to ease the removal of the tube. The tubesheet expansion transition area was therefore not available for laboratory examination.

6. **"Clarify whether the inspection method to be used at ANO-1 is qualified for the detection of circumferential cracks per Appendix H of EPRI Report NP-6201 or whether a site specific qualification program will be used. If using site specific qualification procedures, state the differences and provide the justification for these criteria including a discussion of pulled tube data to support the detectability of circumferential cracks in the field."**

The inspection method for detection of circumferential cracks to be used at ANO-1 will be qualified per EPRI Report NP-6201, Appendix H.

7. **"Discuss the number and types of sleeves used at ANO-1 along with their installation dates (i.e., month/year)."**

ANO-1 presently has a total of 985 B&W Mechanical Rolled Sleeves (31" and 80") installed. A demonstration program utilizing ten (10) of the sleeves was approved for use by ANO-1 Technical Specification Amendment 86, dated November 8, 1984 (1CNA118402). General use of this sleeve type was approved by ANO-1 Technical Specification Amendment 106, dated December 5, 1986 (1CNA128604). Material compositions of the sleeves are Alloy 600 or 690, dependent upon the date of installation. Sixteen (16) sleeves have been removed from service due to defects within the non-sleeved portion of the parent tubes or due to imperfections induced within the sleeve during installation.

Sleeve installation dates, quantity, location, material composition, and dates initially reported to the NRC are provided below:

Date Installed (Mo./Yr.)	Quantity		Material Composition	Date Reported to NRC
	SG "A" 31"/80"	SG "B" 31"/80"		
11/84	0/10	0/0	Alloy 600	March 31, 1987 (1CAN038705)
11/86	0/40	0/0	Alloy 600	February 4, 1987 (1CAN028703)
11/88	0/98	0/76	Alloy 600	December 9, 1988 (1CAN128806)
11/90	0/28	0/78	Alloy 690	December 28, 1990 (1CAN129007)
03/92	56/178	123/221	Alloy 690	May 20, 1992 (1CAN059204)
09/93	0/77	0/0	Alloy 690	November 12, 1993 (1CAN119306)

8. **"During the Maine Yankee outage in July/August 1994, several weaknesses were identified in their eddy current program as detailed in NRC Information Notice 94-88, "Inservice Inspection Deficiencies Result in Severely Degraded Steam Generator Tubes". In Information Notice 94-88, the staff observed that several circumferential indications could be traced back to earlier inspections when the data was reanalyzed using terrain plots. These terrain plots had not been generated as part of the original field analysis for these tubes. For rotating pancake coil (RPC) examinations performed at your plant at locations susceptible to circumferential cracking during the previous inspection (i.e., previous inspection per your Generic Letter 95-03 response), discuss the extent to which terrain plots were used to analyze the eddy current data. If terrain plots were not routinely used at locations susceptible to circumferential cracking, discuss whether or not the RPC eddy current data has been reanalyzed using terrain mapping of the data. If terrain plots were not routinely used during the outage and your data has not been reanalyzed with terrain mapping of the data, discuss your basis for not reanalyzing your previous RPC data in light of the findings at Maine Yankee."**

"Discuss whether terrain plots will be used to analyze the RPC eddy current data at locations susceptible to circumferential cracking during the next

steam generator tube inspection (i.e., the next inspection per your Generic Letter 95-03 response)."

During 1R12, per the requirements of ANO-1 Analysis Guidelines, terrain plots were used for all RPC examinations to enhance detection of indications. Entergy Operations will continue the use of terrain plotting at ANO-1 of all RPC data to enhance the detection capabilities.

Appendix 1A

Requested Actions

1. **"Evaluate recent operating experience with respect to the detection and sizing of circumferential indications to determine applicability to their plant."**

See the B&W Owners Group generic response to GL 95-03 dated June 13, 1995.

Additionally, circumferentially oriented "crack-like" indications at dings have been detected using MRPC at ANO-1 during the Fall 1993 inspection (1R11). These indications are addressed in Entergy Operations' letter to the NRC dated November 12, 1993 (1CAN119306), "Once Through Steam Generator (OTSG) Inservice Inspection Report." The two (2) circumferential oriented indications, isolated in the "A" OTSG lane region at the upper tubesheet secondary face, were removed from service by plugging. Since the repairable indications were located at dings, the MRPC scope was expanded to include all dings in both OTSGs from the 15th TSP and above. No additional indications were detected in this sample. In addition, 136 dings in the "A" and 38 in the "B" OTSGs in the lower tubesheet were inspected, with no indications detected. In all, 384 dings in the "A" OTSG and 84 in the "B" OTSG were inspected with the MRPC probe.

Twenty-five (25) dings in the "A" OTSG and two (2) in the "B" OTSG were inspected using MRPC during the Spring 1995 outage (1R12) with no repairable indications identified.

Because dings result in an increased stress level within the tubing, they are considered to be an area susceptible to circumferential cracking at ANO-1. Two (2) regions in the ANO-1 OTSGs are considered more susceptible to circumferential cracking than other locations. Dings in the upper regions of the OTSG (15th TSP and the upper tube sheet) have increased susceptibility because the tubes are at the hot leg temperature. However, the largest dings at ANO-1 (based on bobbin signal amplitude) are located at the lower tubesheet. Neither of these regions can be considered more susceptible than the other based upon temperature or tubing stress levels relative to ding size. Therefore, both regions will be monitored during the next inspection to ensure any potential initiation of circumferential cracking is detected.

2. **"On the basis of the evaluation in Item 1 above, past inspection scope and results, susceptibility to circumferential cracking, threshold of detection, expected or inferred crack growth rates, and other relevant factors, develop a**

- safety assessment justifying continued operation until the next scheduled steam generator tube inspections are performed.”**

See the B&W Owners Group generic response to GL 95-03 dated June 13, 1995.

If significant circumferential cracking were to occur, it would likely result in primary-to-secondary leakage. Primary-to-secondary leakage is continually monitored using N₁₆ monitors and condenser off-gas radiation monitors. Additionally, weekly condenser off-gas and condensate pump discharge grab samples are analyzed for primary-to-secondary leakage detection. The leakage detection threshold for ANO-1 steam generators is 0.01 gallons per minute (GPM). ANO-1 Technical Specification 3.1.6.3.b requires initiation of reactor shutdown within four hours upon leakage through the tubes of any one steam generator that equals or exceeds 500 gallons per day (GPD), or 0.347 GPM. The reactor is required to be in the cold shutdown condition within the next 30 hours. Procedure 1203.023, "Small Steam Generator Tube Leaks," addresses safe shutdown of the plant for tube leakage ≤ 1.0 GPM with coincident turbine trip and ≤ 10 GPM without coincident turbine trip. Procedure 1203.023 also requires plant shutdown at > 0.1 GPM or when OTSG N₁₆ detector readings are $> 10^4$ CPM in the ANALYZER mode. Procedure 1202.006, "Tube Rupture," addresses safe shutdown of the plant for > 10.0 GPM steam generator tube leakage and for tube leakage > 1.0 GPM with coincident turbine trip. Operations personnel also receive training to mitigate the consequences of tube leakage and tube rupture. The training is addressed by both classroom instruction and simulator drills.

The use of the primary-to-secondary leakage monitoring equipment, leakage limits, and procedures and training for safe shutdown of the plant as a result of excessive steam generator tube leakage or rupture, provides further justification for continued operation of the plant until the next scheduled steam generator tube inspection.

3. **"Develop plans for the next steam generator tube inspections as they pertain to the detection of circumferential cracking. The inspection plans should address, but not be limited to, scope (including sample expansion criteria, if applicable), methods, equipment, and criteria (including personnel training and qualification)."**

The next planned inspection of ANO-1 steam generator tubes will be during the thirteenth refueling outage (1R13), scheduled to begin in September 1996.

The sample of dings to be examined during the next inspection will consist of the following:

- A 10% sample of known dings at the 15th TSP and the upper tubesheet will be inspected. This sample will concentrate on the largest dings at these elevations, as determined by bobbin coil signal amplitudes.
- A 10% sample of the lower tubesheet dings will be examined, concentrating on the largest dings at this elevations, as determined by bobbin coil signal amplitudes.

If circumferential cracking is detected, the examination will be expanded to include an additional 20% of the remaining dings within the affected area in accordance with EPRI PWR Steam Generator Examination Guidelines.

Eddy current probes used will be capable of detecting circumferentially oriented indications. High performance data cables (low voltage loss), dedicated power supplies, and appropriate remote data acquisition units will also be used.

Lissajous strip charts and C-scan plot presentations for all data acquired will be reviewed, as a minimum, at the prime frequency used for the detection of circumferential cracks. Supplemental reviews using data processing techniques found to promote detection in areas of extraneous influence will also be employed.

Essential variables of inspection, as specified by Appendix H of NP-6201, "EPRI PWR Steam Generator Guidelines," Revision 3, will be employed. These include, but are not limited to:

- Digitization
- Pull speed
- Probe rotational speed
- Analog signal cable lengths
- Acquisition frequency

Dual analysis by different vendors will be conducted. Analysts used will be qualified in accordance with the American Society for Nondestructive Testing guideline "Personnel Qualification and Certification in Nondestructive Testing" (SNT-TC-1A), and certified to Level II or III. Analysts will also have site specific training and meet ANO performance demonstration requirements. These analysts will perform their duties per site specific analyst guidelines.

Attachment 2

Arkansas Nuclear One - Unit 2 Response to Generic Letter 95-03 Request for Additional Information

1. "The following areas have been identified as being susceptible to circumferential cracking:
 - a. Expansion transition circumferential cracking
 - b. Small radius U-bend circumferential cracking
 - c. Dented location (including dented TSP) circumferential cracking
 - d. Sleeve joint circumferential cracking"

"In your response, area b was not specifically addressed, although it was indicated that circumferential cracking has also been observed in the U-bend region of a retired Combustion Engineering steam generator. In addition, recirculating steam generators designed by another vendor have experienced circumferential cracking in the U-bend portion of tubes with small radius U-bends. Please submit the information requested in Generic Letter (GL) 95-03 per the guidance contained in the GL for this area (and any other area susceptible to circumferential cracking). The staff realizes that some of the above areas may not have been addressed since they may not be applicable to your plant; however, the staff requests that you clarify this (e.g., no sleeves are installed; therefore, the plant is not susceptible to sleeve joint circumferential cracking)."

"In your response, it was indicated that dented locations (specifically dented support plate locations) are susceptible to circumferential cracking and that some of these locations were examined during the prior inspection outage. Discuss the criteria used for determining which dents were examined. If a voltage threshold was used for determining the threshold for examining dents, provide the calibration procedure used (e.g., 4.0 volts on 4-20% through-wall ASME holes at 550/130 mix). In addition, clarify the past inspection scope and your future inspection plans for dented locations."

Small Radius U-bend Circumferential Cracking

To date, there has not been any occurrence of circumferential cracking in the tight radius (rows 1 and 2) U-bends of any CE supplied steam generator based on the results of several MRPC inspections. The ANO-2 steam generator design is such that the diagonal and vertical support straps (batwings) do not extend down past the small radius U-bends. The theory is that the circumferential cracks that have

been seen at other plants were due to the horizontal/vertical supports being in contact with the bent portion of the tube, which has a higher residual stress level than the straight portion. The resulting crevice can form a site for concentrating species in this area of the tube and result in stress corrosion cracking. The ANO-2 design is such that the "batwing supports" do not extend down to any U-bend rows, and thus are only in contact with the straight portion of tubing between the 90° bends.

Since small radius U-bend circumferential cracking has not been found in any CE supplied steam generator, the justification for continued operation referenced in the original response to GL 95-03 for ANO-2 remains valid.

In the current refueling outage, ANO-2 is using a plus point coil to inspect a 20% sample of the row 1 tubes (those that will have the highest stress). Expansion to 100% of the row 1 tubes will be performed if one or more repairable indications are detected. If additional repairable indications are found, an expansion into row 2 will be performed.

Dented Intersections

During the last two refueling outages (2R9 & 2R10), all tubes in the two drilled hole partial support plates (10th and 11th) were inspected with a bobbin coil. Results obtained from 4601 dents in SG "A" and 2917 in SG "B" during 2R10 were analyzed and compared to the data taken in 2R9. The method for measurement and reporting of dents is consistent with practices at CE plants. Indications greater than one (1) radial mil were recorded as dents. Radial dents on the ASME calibration standard were set to one (1) volt per mil of radial reduction on the 400 KHz absolute channel. An average voltage was calculated using a total voltage value divided by the number of dents identified. The increase in average voltage was insignificant from 1992 to 1994 (0.33 volt average growth in SG "A" and 0.13 volts average growth in SG "B"). Approximately 20% of the 10th support plate hotleg indications (1066) were tested and analyzed using the 0.115" MRPC. A voltage threshold was not used to determine which dents to inspect. No flaws of any kind were detected. There have also been no indications seen at the non-dented drilled support plates. There are no plans in the current outage to reassess the dented intersections, but a 100% full length bobbin examination is scheduled. The need to inspect dented tubes for circumferential cracks will be reevaluated prior to each refueling outage.

2. **"It was indicated that sleeves are installed at ANO-2. Please discuss the types of sleeves installed at ANO-2."**

There are currently 442 B&W double kinetic welded sleeves in service (387 in SG "A" and 55 in SG "B"). Originally, 448 sleeves were placed in service during 2F92, of which four (4) were plugged in 2R9 and two (2) in 2R10 due to new

indications at other locations in the parent tubes. The original sleeve design developed for ANO-2 was based on the sleeve design for Westinghouse model D steam generators. Use of this sleeve design was approved by ANO-2 Technical Specification Amendment 133, dated April 22, 1992 (2CNA049203). The number and location of sleeves installed were also previously reported to the NRC on May 12, 1992 (2CAN059202). The ANO joint design was essentially the same as qualified by the original BWNS report, BAW-2045PA-00, with the following exceptions:

- The ends of the sleeve have a smaller pre-expansion. Centering of the sleeve in the parent tube is accomplished by the use of plastic spring fingers on the bottom end of the sleeve. These fingers are then ejected from the sleeve by the explosion, recovered and removed.
- The explosive charge loading in the kinetic weld devices was reduced in order to minimize deformation of the parent tube. In addition, since the parent tube wall for ANO-2 is thicker than the Model D design, the resulting deformation was less resulting in a lower stress in the tube.
- The kinetic expansions in the ANO-2 design are produced simultaneously.

ANO-2 Technical Specification Amendment 142, dated January 26, 1993 (2CNA019303), approved the use of CE supplied sleeves, as described in CEN-601-P, in the ANO-2 SGs. This type of sleeve is being utilized during the current refueling outage.

3. **"During the Maine Yankee outage in July/August 1994, several weaknesses were identified in their eddy current program as detailed in NRC Information Notice 94-88, "Inservice Inspection Deficiencies Result in Severely Degraded Steam Generator Tubes". In Information Notice 94-88, the staff observed that several circumferential indications could be traced back to earlier inspections when the data was reanalyzed using terrain plots. These terrain plots had not been generated as part of the original field analysis for these tubes. For rotating pancake coil (RPC) examinations performed at your plant at locations susceptible to circumferential cracking during the previous inspection (i.e., previous inspection per your Generic Letter 95-03 response), discuss the extent to which terrain plots were used to analyze the eddy current data. If terrain plots were not routinely used at locations susceptible to circumferential cracking, discuss whether or not the RPC eddy current data has been reanalyzed using terrain mapping of the data. If terrain plots were not routinely used during the outage and your data has not been reanalyzed with terrain mapping of the data, discuss your basis for not reanalyzing your previous RPC data in light of the findings at Maine Yankee."**

“Discuss whether terrain plots will be used to analyze the RPC eddy current data at locations susceptible to circumferential cracking during the next steam generator tube inspection (i.e., the next inspection per your Generic Letter 95-03 response).”

During 2P95, per the requirements of ANO-2 Analysis Guidelines, terrain plots were used for all RPC examinations to enhance detection of indications. Entergy Operations will continue the use of terrain plotting at ANO-2 of all RPC data to enhance the detection capabilities.