



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

November 30, 1995

Mr. Ross P. Barkhurst  
Vice President Operations  
Entergy Operations, Inc.  
P. O. Box B  
Killona, LA 70066

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - UPDATE OF INSERVICE INSPECTION (ISI) AND INSERVICE TESTING (IST) PROGRAM (TAC NO. M89544)

Dear Mr. Barkhurst:

In 1993, NRC initiated a program inviting licensees to submit cost-beneficial licensing actions (CBLAs) that could save resources and defer costs without adversely impacting safety. The intent of the CBLA program was to raise the low priority of licensee requests that have low safety-significant impact but may require substantive resources. Approval of CBLAs could allow a licensee to focus resources on issues that have greater safety significance. In evaluating the requests, the staff was not to consider cost savings as justification for NRC approval, but to review the issues on their technical merits.

Entergy Operations, Inc. (EOI), submitted a CBLA request on October 21, 1993, to request an alternative pursuant to 10 CFR 50.55a(a)(3) that would allow the licensee to continue implementation of the then current ISI and IST programs and update the programs to incorporate only those portions of later editions of the ASME BPV Code (or other applicable codes) that have an impact on the risk of each of the affected plants. EOI maintained that the proposed alternative (i.e., continued use of the current edition of the ASME BPV Code) provided an acceptable level of quality and safety and that the required update was considered a hardship without a compensating increase in the level of quality and safety (i.e., procedures must be changed and many new ASME BPV Code requirements of low safety significance must be implemented).

The NRC staff reviewed the EOI proposal and met with EOI in April 1994 to discuss the staff approach to respond to their request. The staff stated that the issue would be addressed through rulemaking. Additionally, the staff stated that, as part of the rule change to eliminate the 10-year update requirement, the regulations would be amended to baseline all licensees to a relatively recent edition of the Code. The proposed schedule for rulemaking projected completion of the final rule before September 1996. On August 2, 1994, NRC authorized an extension of the ISI and IST programs for the affected EOI plants (Grand Gulf, Waterford, and ANO-1), which otherwise would have been required to be updated to the 1989 Edition of Section XI before September 1996.

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Although the staff expects to issue the proposed rulemaking for public comment within the next few months, several issues have caused delay. Completion of the rulemaking process before September 1996 is unlikely. The NRC staff determined that EOI should be advised as to the status of the rulemaking in relation to the extensions granted for their facilities. Under the current provisions of the rule, the programs for each of the affected Entergy plants would have been updated to the requirements of the 1989 Edition of the BPV Code. As discussed in the NRC/EOI meeting in April 1994, the NRC would propose to establish a baseline edition of the Code along with the elimination of the 10-year update requirement. The proposed rule will require all licenses to "baseline" their programs to the 1989 Edition of the BPV Code and the 1990 Edition of the ASME Operations and Maintenance Code (the OM Code). The 1990 OM Code contains the same requirements for IST as the 1989 Edition of the BPV Code. Therefore, updating the programs at the EOI plants to the 1989 Edition of the BPV Code and the 1990 Edition of the OM Code will comport with both the current regulations and the proposed rule change. Though the staff cannot guarantee that the proposed rule will remain as currently drafted, or even that the proposed changes will be issued, if the ISI and IST programs at the affected Entergy plants are updated within 12 months of a final rule change, the 1989 Edition would be acceptable for at least the next ten-year interval. The staff regrets any problems that delays of the proposed rule changes may have caused EOI in long-term planning for the ISI and IST programs.

EOI has the option to propose alternatives to any specific requirements of these editions of the codes, or to propose the use of the 1992 or 1995 Edition of the Code, pursuant to 10 CFR 50.55a(a)(3). Additionally, while the NRC staff has determined that a further extensions of the current intervals are not warranted in that the schedule for examinations and testing will be adversely affected (i.e., the code intervals are based on ten years such that examinations and testing are performed at approximately the same time from one interval to the next), EOI may request to begin a new interval using the same program for the current interval and then updating the programs within a specified period of time. Such a request would have to be supported by a need and justified under the provisions of 10 CFR 50.55a(a)(3).

Because the proposed rule will still require one more update for those plants that have not updated to the baseline editions of the codes, or the submittal of an alternative for certain of the requirements, EOI would not be expending unnecessary resources to complete an updated program for each of the plants (i.e., those resources will have to be expended eventually). Additionally, in the event that the rule change is not approved as proposed, EOI will be in compliance with the current rule. Therefore, the staff believes that there are several viable options available to EOI that will not create an undue burden in light of the existing regulatory requirements.

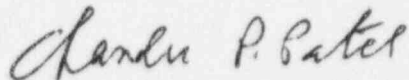
Mr. Ross P. Barkhurst

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EOI is requested to confirm within 60 days that it intends to update the ISI and IST programs of its facilities and inform the staff of its expected update schedule or that it will review options and propose action at a later date.

This requirement affects nine or fewer respondents and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,



Chandu P. Patel, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-382

cc: See next page

Mr. Ross P. Barkhurst

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Original Signed By:

Chandu P. Patel, Project Manager  
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Office of Nuclear Reactor Regulation

Docket No. 50-382

cc: See next page

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