

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20585-0001

December 26, 1995

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

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ALTERNATIVE REQUIREMENTS

TO REPAIR AND REPLACEMENT DOCUMENTATION REQUIREMENTS: CODE

CASE N-532 (TAC NO. M93860)

Dear Mr. Barkhurst:

By letter dated October 6, 1995, Entergy Operations, Inc. submitted a request on behalf of Arkausas Nuclear One, Units 1 and 2, Waterford Steam Electric Station, Unit 3, Grand Gulf Nuclear Station, Unit 1, and River Bend Station, Unit 1. This submittal requests approval to use 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," as an alternative to the American Society of Mechanical English (ASME) Section XI requirements for documentation of inservice report production and submission as required by IWA-4901(d), IWA-6210(c), (d), and (e), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6420(b). Code Case N-532 was approved by the ASME Board of Nuclear Codes and Standards on December 12, 1994, and is included in the Nuclear Code Case Book for the 1995 edition of the Code. Code Case N-532 has not received NRC endorsement and has not been added to the list of code cases in NRC Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability-ASME Section XI Division I."

Entergy Operations, Inc. contends that the use of this code case would result in 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 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.

Use of the Code Case N-532 will still involve the preparation of a REPAIR/REPLACEMENT CERTIFICATION RECORD, FORM NIS-2A. The NIS-2A form will be certified by the inspector and will be maintained by the Owner. An OWNER'S ACTIVITY REPORT FORM, OAR-1 shall be prepared and certified at the completion of each refueling outage. Each OAR-1 form shall contain an abstract of applicable examinations and tests, a list of item(s) with flaws or relevant conditions that require evaluation to determine acceptability for continued service, an abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded the applicable acceptance criteria. The use of Code Case N-532 will result in the submittal of information to assess the safety of the code activities that have occurred at the refueling outage. The review

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using the information as prescribed by the code case will provide the same or an improved level of safety as reviews that may have been conducted using the older reporting requirements. In addition, more detailed information will be available and may be requested by the staff if it is deemed necessary.

We find that pursuant to 10 CFR 50.55a(a)(3)(i), the proposed alternative would result in an acceptable level of quality and safety. Therefore, the use of Code Case N-532 is authorized.

Sincerely,

ORIGINAL SIGNED BY:

William D. Beckner, Director Project Directorate IV-1 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket No. 50-382

cc: See next page

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Sincerely,

William D. Beckner, Director Project Directorate IV-1

William D. Boh

Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket No. 50-382

cc: See next page

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