



ENTERGY

Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61
P.O. Box 220
St. Francisville, LA 70775
Tel 504 336 6225
Fax 504 635 5068

James J. Fisicaro
Director
Nuclear Safety

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U.S. Nuclear Regulatory Commission
Document Control Desk
Mail Stop P1-37
Washington, D.C. 20555

Subject: Relief from ASME Inspection Requirements/
Use of ASME Code Case N-509
River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47

File No. G9.5

RBG-42006
RBF1-95-0200

Gentlemen:

By this letter, River Bend Station (RBS) requests relief from the requirements contained in Table IWB/C-2412-1 of the American Society of Mechanical Engineers (ASME) Section XI pursuant to 10CFR50.55a(g)(6). Also requested is approval, pursuant to 10CFR50.55a(a)(3), for the use of Code Case N-509, "Alternative Rules for the Selection and Examination of Classes 1, 2, and 3 Integrally Welded Attachments, Section XI, Division 1," as an alternative to the ASME Section XI requirements in effect at River Bend Station (RBS).

Through an ongoing effort to establish consistency between the five nuclear units within Entergy Operations, Inc. (EOI), a disparity was identified between the RBS Inservice Inspection Program and the other EOI Inservice Inspection Programs. During a recent Inservice Inspection Program comparison that focused on integral attachment examinations, it was noted that the selection criterion were interpreted differently at RBS than at the other EOI sites. ASME Section XI requires that non-exempt Class 1 and Class 2 integrally welded attachments be volumetric or surface examined in accordance with Table IWB-2500-1, Category B-K-1 and Table IWC-2500-1, Category C-C. RBS interpreted the tables to require

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25% of integral attachments (Code Item Nos. B10.10 and C3.20) to be selected for examination (50% of Main Steam). This interpretation was based upon the requirements in Examination Tables B-J and C-F to select 25% of pressure retaining piping welds in Class 1 and Class 2 systems (50% Main Steam).

Upon identifying the disparity, cognizant individuals from each EOI site discussed the issue to determine necessary action. Through this discussion, it was determined that the more conservative interpretation (100% examined) should be invoked at RBS. As a result of this decision, the remaining integrally welded attachments that have not been inspected were scheduled for examination during the next refueling outage, which is the final refueling outage of the first 10-year interval.

RBS is currently in the third inspection period of the 10-year interval. To date, 24% of Class 1 and 44% of Class 2 integrally welded attachments have been examined. Table IWB/C-2412-1 of ASME Section XI requires that examinations of Class 1 and 2 components be at least 50% complete by the end of the second period of the 10 year interval. As a result of the decision to examine 100% of the attachments, this requirement of the ASME Code no longer has been met; therefore, RBS requests relief.

In addition, RBS requests approval for the use of ASME Code Case N-509 as an alternative to the requirements of ASME Section XI. This Code Case was approved by the ASME Board of Nuclear Codes and Standards on November 25, 1992; however, it has not been approved for use in NRC Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1."

While this Code Case does significantly reduce the number of integrally welded attachments examined, EOI is confident that this reduction will not adversely affect plant safety or the physical integrity of these components at RBS. Of the 118 integrally welded attachments that have been examined since initial plant startup, no degradation has been reported.

The alternatives contained within Code Case N-509 have already been authorized for use at North Anna Station, Unit 2 (Reference 2). A restriction to ensure examination of a 10% sample of all non-exempt Code Class 1, 2, and 3 integrally welded attachments was stipulated with the authorization given to North Anna. RBS also plans to comply with this restriction.

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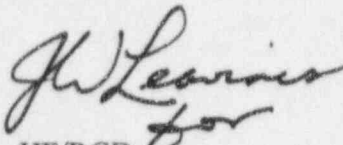
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Implementation of Code Case N-509 will result in a significant cost savings (approximately \$105K) and a reduction in man-rem dose exposure of 740 mRem for the next scheduled refueling outage (scheduled for January 6, 1996). Because of the significant cost savings and the reduction in dose that is achieved by the use of this code case, EOI requests that this submittal be considered a Cost Beneficial Licensing Action (CBLA) in accordance with NRC Administrative Letter 95-02, "Cost Beneficial Licensing Actions." This submittal has been discussed with the NRR Project Manager for RBS.

Sincerely,



JJ/RCD

cc: U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Sr. Resident Inspector
P. O. Box 1051
St. Francisville, LA 70775

Mr. David Wigginton
NRR Project Manager
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3, One White Flint North
11555 Rockville Pike
Rockville, MD 20852