

December 28, 1995

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

Subject: Arkansas Nuclear One - Unit 2

Docket No. 50-368 License No. NPF-6

Use Of ASME Code Case N-533

Gentlemen:

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-533 as an alternative to the ASME Section XI Code requirements contained in the 1986 edition, no addenda, in effect at Arkansas Nuclear One, Unit 2 (ANO-2). Code Case N-533 was approved for use on March 14, 1995, 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."

Code Case N-533, "Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure-Retaining Bolted Connections, Section XI, Division 1," provides an alternative to the code requirements of IWA-5242(a). This code case maintains the basis of IWA-5242(a), i.e., a leakage test of bolted connections in class 1 systems each refueling outage. The code case substitutes a VT-2 visual examination of a bolted connection without the connection pressurized and with the insulation removed, and a second VT-2 examination of the bolted connection at pressure with the insulation intact in lieu of one VT-2 examination of the bolted connection to be conducted at pressure with the insulation removed. Based upon the preceding, Entergy Operations has concluded that the proposed alternative will provide an acceptable level of quality and safety as required by 10CFR50.55a(a)(3)(i).

Use of Code Case N-533 will reduce critical path time, occupational dose, and heat stress to workers during each future refueling outage. Savings are estimated to be \$20,000 per outage and \$300,000 over the life of ANO-2. Due to these cost savings and the marginal effect on

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safety, if any, expected by adoption of this code case, Entergy Operations requests that this submittal be considered a cost beneficial licensing action (CBLA).

Approval for use of this code case is requested by September 1, 1996, in order to facilitate planning for the next refueling outage at ANO-2, which is scheduled to begin in March 1997. Should you have any questions regarding this submittal, please contact me.

Very truly yours,

Dwight C. Mims

Director, Nuclear Safety

DCM/jjd

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