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December 28, 1995

0CAN129503

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

Subject: Use of ASME Code Case N-498-2

Arkansas Nuclear One - Units 1 and 2 Docket Nos. 50-313 and 50-368 License Nos. DPR-51 and NPF-6

Grand Gulf Nuclear Station Docket No. 50-416 License No. NPF-29

Waterford 3 Steam Electric Station Docket No. 50-382 License No. NPF-38

River Bend Station Docket No. 50-458 License No. NPF-47

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-498-2 as an alternative to the ASME Section XI Code requirements in effect at all of Entergy Operations' nuclear units, i.e., Arkansas Nuclear One, Units 1 and 2 (ANO), Grand Gulf Nuclear Station, Waterford 3 Steam Electric Station, and River Bend Station. Code Case N-498-2 was approved for use on June 9, 1995, by the ASME Board of Nuclear Codes and Standards and is included in Supplement 1, Nuclear Code Cases, of the 1995 Edition. 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."

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Code Case N-498-2, "Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems, Section XI, Division 1," provides an alternative to the specific code requirements of Table IWB-2500-1, Category B-P, Table IWC-2500-1, Category C-H, and Table IWD-2500-1, Categories D-A, D-B, and D-C, as applicable. Entergy Operations has previously received NRC staff approval to use Code Case N-498-1, which provides a significant reduction in the burden associated with performance of 10-year hydrostatic tests. The additional burden reduction obtainable from the use of Code Case N-498-2 would be realized by the elimination of the requirement to hold insulated systems at nominal operating pressure for four hours (ten minutes for noninsulated systems) prior to performing the VT-2 visual examination.

Approval for use of this code case is requested by March 1, 1996, in order to facilitate planning for the next refueling outage at ANO-1, which is scheduled to begin in September 1996. Approval of the alternative described in the code case would then allow subsequent utilization at the other Entergy Operations nuclear units as the 10-year tests are performed.

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

Very truly yours,

for Dwight C. Mims Director, Nuclear Safety

DCM/jjd

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