



Entergy Nuclear Operations, Inc.  
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Ron Gaston  
Director, Nuclear Licensing

10 CFR 50.55a

CNRO-2020-00016

August 12, 2020

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Relief Request EN-RR-20-002: Proposed Use of Subsequent ASME Code Edition and Addenda in Accordance with 10 CFR 50.55a(g)(4)(iv)

Arkansas Nuclear One, Units 1 and 2  
NRC Docket Nos. 50-313, 50-368, and 72-13  
Renewed Facility Operating License Nos. DPR-51 and NPF-6

Grand Gulf Nuclear Station, Unit 1  
NRC Docket Nos. 50-416 and 72-50  
Renewed Facility Operating License No. NPF-29

Indian Point Nuclear Generating Unit No. 3  
NRC Docket Nos. 50-286 and 72-51  
Renewed Facility Operating License No. DPR-64

Palisades Nuclear Plant  
NRC Docket Nos. 50-255 and 72-07  
Renewed Facility Operating License No. DPR-20

River Bend Station, Unit 1  
NRC Docket Nos. 50-458 and 72-49  
Renewed Facility Operating License No. NPF-47

Waterford Steam Electric Station, Unit 3  
NRC Docket Nos. 50-382 and 72-75  
Renewed Facility Operating License No. NPF-38

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," Entergy Operations, Inc. and Entergy Nuclear Operations, Inc. (collectively referred to as Entergy) requests NRC approval to use a specific provision of a later edition of the American Society of Mechanical

Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the units identified above. Specifically, Entergy requests approval to use IWA-4540(b) of the 2017 Edition of the ASME B&PV Code. The Enclosure to this letter provides Entergy's request, including the basis for the proposed alternative.

Entergy requests approval of this request by September 30, 2020. This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact Ron Gaston, Director, Nuclear Licensing at 601-368-5138.

Respectfully,



Ron Gaston

RG/jls

Enclosure: Relief Request EN-RR-20-002: Proposed Use of Subsequent ASME Code Edition and Addenda in Accordance with 10 CFR 50.55a(g)(4)(iv)

NRC Region I - Regional Administrator  
NRC Region III - Regional Administrator  
NRC Region IV - Regional Administrator  
NRC Project Manager – Entergy fleet  
NRC Project Manager - Arkansas Nuclear One, Units 1 and 2  
NRC Project Manager - Grand Gulf Nuclear Station, Unit 1  
NRC Project Manager – Indian Point Nuclear Generating Unit Nos. 2 and 3  
NRC Project Manager – Palisades Nuclear Plant  
NRC Project Manager – River Bend Station, Unit 1  
NRC Project Manager – Waterford Steam Electric Station, Unit 3  
NRC Senior Resident Inspector – Arkansas Nuclear One, Units 1 and 2  
NRC Senior Resident Inspector – Grand Gulf Nuclear Station, Unit 1  
NRC Senior Resident Inspector – Indian Point Nuclear Generating Units 2 and 3  
NRC Senior Resident Inspector – Palisades Nuclear Plant  
NRC Senior Resident Inspector – River Bend Station, Unit 1  
NRC Senior Resident Inspector – Waterford Steam Electric Station, Unit 3  
Arkansas Department of Health, Radiation Control Section  
State Health Officer, Mississippi Department of Health  
President and CEO, NYSERDA  
New York State Public Service Commission  
Michigan Department of Environmental Quality  
Louisiana of Department of Environmental Quality

**Enclosure**

**CNRO-2020-00016**

**Relief Request EN-RR-20-002**

Proposed Use of Subsequent ASME Code Edition and Addenda  
in Accordance with 10 CFR 50.55a(g)(4)(iv)

Arkansas Nuclear One, Units 1 and 2  
Grand Gulf Nuclear Station, Unit 1  
Indian Point Nuclear Generating Unit No. 3  
Palisades Nuclear Plant  
River Bend Station, Unit 1  
Waterford Steam Electric Station, Unit 3

(3 Pages)

**Entergy Nuclear Operations, Inc  
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**Relief Request EN-RR-20-002**

**Proposed Use of Subsequent ASME Code Edition and Addenda  
 in Accordance with 10 CFR 50.55a(g)(4)(iv)**

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in Reference 1, Entergy Operations, Inc. and Entergy Nuclear Operations, Inc. (collectively referred to as Entergy) requests U.S. Nuclear Regulatory Commission (NRC) approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the units listed below. Specifically, Entergy requests approval to use IWA-4540(b) of the 2017 Edition of the ASME B&PV Code.

1. ASME Code Component(s) Affected:

All Class 1, 2, and 3 items located in the ASME Section XI boundaries.

2. Requested Date for Approval:

Approval requested by September 30, 2020

3. Applicable Code Edition and Addenda:

<u>Unit</u>	<u>ISI INTERVAL</u>	<u>EDITION</u>	<u>INTERVAL START</u>	<u>INTERVAL SCHEDULED END</u>
Arkansas Nuclear One, Unit 1	5	2007 Edition, through 2008 Addenda	5/31/2017	5/30/2027
Arkansas Nuclear One, Unit 2	5	2007 Edition, through 2008 Addenda	3/26/2020	3/25/2030
Grand Gulf Nuclear Station, Unit 1	4	2007 Edition, through 2008 Addenda	12/1/2017	11/30/2026
Indian Point Nuclear Generating Unit No. 3 (IP3)	4	2001 Edition, through 2003 Addenda <sup>1</sup>	7/21/2009	7/20/2021 <sup>2</sup>
Palisades Nuclear Plant	5	2007 Edition, through 2008 Addenda <sup>3</sup>	12/13/2015	12/12/2025
River Bend Station, Unit 1	4	2007 Edition, through 2008 Addenda	12/1/2017	11/30/2027
Waterford Steam Electric Station, Unit 3	4	2007 Edition, through 2008 Addenda	12/1/2017	11/30/2027

<sup>1</sup> IP3 performs ISI in accordance with the 2001 Edition/ 2003 Addenda. However, IP3 performs ISI-related activities such as repair/replacement activities, pressure testing, and nondestructive examinations in accordance with the 2007 Edition/2008 Addenda based on NRC approval of Request EN-ISI-16-1 by Safety Evaluation (SE) dated July 12, 2017 (ADAMS Accession No. ML17174B144).

<sup>2</sup> Entergy extended the IP3 4<sup>th</sup> ISI interval based on NRC approval of Relief Request IP3-ISI-RR-13 by SE dated July 18, 2018 (ML18193B030).

<sup>3</sup> As an exception to the ASME Section XI Edition/Addenda specified in the table, the Palisades Nuclear Plant Containment ISI Program is based on the 2013 Edition of ASME Section XI. Likewise, repair/replacement activities on the IWE/IWL containment boundary are also performed in accordance with the 2013 Edition of ASME Section XI. The start and end dates for the present Containment ISI intervals are 10/17/19 through 10/17/29.

4. Proposed Subsequent Code Edition and Addenda (or Portion):

All Entergy units perform Repair/Replacement activities in accordance with a standardized fleet program. This standardized program is based on an Edition of ASME Section XI which, at present, is the 2007 Edition through the 2008 Addenda. [Note: The Palisades Nuclear Plant Containment ISI Repair/Replacement activities are based on the 2013 Edition].

In accordance with 10 CFR 50.55a(g)(4)(iv), Entergy requests permission to utilize IWA-4540(b) from the 2017 Edition. This subparagraph outlines items that are exempt from pressure testing after repair/replacement activities.

5. Related Requirements:

10 CFR 50.55a(g)(4)(iv) states:

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met."

10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME B&PV Code 2017 Edition as approved in Reference 3. Entergy is requesting to use of IWA-4540(b) of the 2017 Edition of ASME Section XI to utilize the exemptions listed. There are no related requirements or applicable conditions associated with this subparagraph, IWA-4540(b).

6. Duration of Proposed Request:

The duration of this request will continue for the remainder of the sites' current Inservice Inspection interval.

7. References:

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004.
2. NRC Memorandum, "Summary of the June 25, 2020, Public Meeting with the Nuclear Industry to Discuss Title 10 of the Code of Federal Regulations Section 50.55a(b)(2)(xxvi) Condition on the Pressure Testing of Class 1, 2, and 3 Mechanical Joints," dated July 8, 2020 (ADAMS Accession No. ML20189A286)
3. Federal Register, 85 FR 26540, dated May 4, 2020

8. Precedents

No precedents have been identified.