

From: Lingam, Siva
Sent: Monday, June 14, 2021 11:22 AM
To: Hardy, Jeffery A
Cc: Dixon-Herrity, Jennifer; Lee, Samson; Buford, Angie; Farnan, Michael; Wong, Yuken; Meister, Richard; Couture III, Philip
Subject: Grand Gulf - Acceptance Review for Inservice Testing Program Relief Request VRR-GGNS-2021-1, Pressure Isolation Valve Testing Frequency (EPID L-2021-LLR-0040)

By letter dated June 1, 2021 (Agencywide Documents Access and Management System Accession No. ML21152A290), Entergy Operations, Inc. (Entergy) submitted a relief request VRR-GGNS-2021-1 to U.S. Nuclear Regulatory Commission (NRC) proposing an alternative to the requirements of American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), Section ISTC-3522, "Category C Check Valves," and Subsection ISTC-3630(a) under Section ISTC-3630, "Leakage Rate for Other Than Containment Isolation Valves" for 22 pressure isolation valves (PIVs) at Grand Gulf Nuclear Station, Unit 1 (Grand Gulf). Entergy requests NRC approval of the proposed relief request in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a (z)(1), "Alternatives to codes and standards requirements." Entergy is currently operating Grand Gulf in the fourth 10-year interval of the Inservice Test (IST) Program in compliance with the 2004 Edition of the ASME OM Code through, and including, the 2006 Addenda..

This relief request is for NRC approval of an alternative to the OM Code PIV testing frequency (i.e., each refueling outage). Entergy proposes to adopt a performance-based testing frequency for the 22 PIVs, similar to that established under 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Option B, "Performance-Based Requirements." Entergy proposes 10 CFR 50.55a(z)(1) alternative for more efficient plant operation and lower cumulative radiation exposure, while maintaining an acceptable level of quality and safety.

The purpose of this e-mail is to provide the results of the NRC staff's acceptance review for the relief request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed relief request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 104 hours to complete. The NRC staff expects to

complete this review by November 30, 2021, or earlier. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, or unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1564.

Siva P. Lingam
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