

From: Wengert, Thomas
Sent: Thursday, June 23, 2022 7:58 AM
To: Keele Jr, Riley D
Cc: CLARK, ROBERT W; Dixon-Herrity, Jennifer
Subject: ANO-2 Final RAI RE: Relief Requests ANO2-ISI-023 through -028 (EPIDs L-2022-LLR-0022 through -0027)
Attachments: ANO-2 Final RAI -- Relief Requests Concerning Weld Examination Coverage.pdf

[Resent to Correct Subject Line]

On June 22, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff sent Entergy Operations, Inc. (the licensee) the draft Request for Additional Information (RAI) identified below. This RAI relates to relief requests ANO2-ISI-023, ANO2-ISI-024, ANO2-ISI-025, ANO2-ISI-026, ANO2-ISI-027, and ANO2-ISI-028, which pertain to the examination coverage of Class 1 and 2 vessel welds and Class 1 and 2 piping welds in the fourth 10-year inservice inspection (ISI) interval for Arkansas Nuclear One, Unit 2 (ANO-2).

The licensee subsequently informed the NRC staff that the information requested by the staff was understood and that no additional clarification of the RAI was necessary. A publicly available version of this final RAI (attached with "Draft" removed) will be placed in the NRC's Agencywide Documents Access and Management System (ADAMS). As agreed, please provide a response to this RAI within 30 days of the date of this request.

From: Wengert, Thomas
Sent: Wednesday, June 22, 2022 2:29 PM
To: Keele Jr, Riley D <rkeele@entergy.com>
Cc: 'Clark, Robert' <RCLARK@entergy.com>; Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>
Subject: ANO-2 Draft RAI RE: Relief Requests ANO2-ISI-023 through -028 (EPIDs L-2022-LLR-0022 through -0027)

By letter dated February 24, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22055B120), Entergy Operations, Inc., (the licensee) requested relief in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii) from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI. Specifically, relief requests ANO2-ISI-023, ANO2-ISI-024, ANO2-ISI-025, ANO2-ISI-026, ANO2-ISI-027, and ANO2-ISI-028 pertain to the examination coverage of Class 1 and 2 vessel welds and Class 1 and 2 piping welds in the fourth 10-year inservice inspection (ISI) interval for Arkansas Nuclear One, Unit 2 (ANO-2).

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information, as described in the attached request for additional information (RAI), is required for the staff to complete its review of this application. This RAI is identified as draft at this time to confirm your understanding of the information that the NRC staff needs to complete the evaluation. If the request for information is understood, please respond to this RAI within 30 days of the date of this request.

Please contact me if you would like to set up a conference call with the NRC staff to clarify this request for information.

Tom Wengert
Project Manager – Arkansas Nuclear One
NRR/DORL/LPL4
(301) 415-4037

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Tracking Status: None
"Keele Jr, Riley D" <rkeele@entergy.com>
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REQUEST FOR ADDITIONAL INFORMATION

RELIEF REQUESTS ANO2-ISI-023, ANO2-ISI-024, ANO2-ISI-025, ANO2-ISI-026,
ANO2-ISI-027, AND ANO2-ISI-028 REGARDING WELD EXAMINATION COVERAGE

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT 2

DOCKET NO. 50-368

By letter dated February 24, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22055B120), Entergy Operations, Inc., (the licensee) requested relief in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii) from certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI. Specifically, relief requests ANO2-ISI-023, ANO2-ISI-024, ANO2-ISI-025, ANO2-ISI-026, ANO2-ISI-027, and ANO2-ISI-028 pertain to the examination coverage of Class 1 and 2 vessel welds and Class 1 and 2 piping welds in the fourth 10-year inservice inspection (ISI) interval for Arkansas Nuclear One, Unit 2 (ANO-2).

To complete its review, the NRC staff requests the following additional information.

Regulatory Basis

Pursuant to 10 CFR 50.55a(g)(5)(iii), if a licensee has determined that conformance with an ASME Code requirement is impractical for its facility, the licensee must notify the NRC and submit, as specified in Section 50.4, information to support the determinations. Determinations of impracticality in accordance with Section 50.55a must be based on the demonstrated limitations experienced when attempting to comply with the Code requirements during the ISI interval for which the request is being submitted. Requests for relief made in accordance with Section 50.55a must be submitted to the NRC no later than 12 months after the expiration of the initial or subsequent 120-month inspection interval for which relief is sought.

Request for Additional Information (RAI)

RAI-1

The cover letter of the submittal references the regulation in 10 CFR 50.55a(z)(2) to request a relief under impracticality. In addition, Section II of ANO2-ISI-023 references the regulations in 10 CFR 50.55a(g)(6)(iii) and Section II of ANO2-ISI-024, ANO2-ISI-025, ANO2-ISI-026, ANO2-ISI-027, and ANO2-ISI-028 reference the regulations in 10 CFR 50.55a(g)(6)(i).

However, the provisions for requesting relief for limited examination coverage are specified in 10 CFR 50.55a(g)(5)(iii), "ISI program update: Notification of impractical ISI Code requirements." Confirm which provision of 10 CFR 50.55a is being cited for this request.

RAI-2

In the submittal, the licensee states, in part,

The [ANO-2 fourth 10-year ISI] interval started on March 26, 2010, and ended on August 1, 2020. The second period started on March 26, 2013, and ended March 25, 2017. The third period started March 26, 2017 and ended August 1, 2020. The interval was extended to end March 25, 2021.

However, the NRC staff notes that in Reference 1 of the submittal (i.e., letter dated December 1, 2016 (ML16337A368)), the licensee stated that the fourth 10-year ISI interval started on March 26, 2010, and is scheduled to end on March 25, 2020. This appears to conflict with the completion dates of the fourth 10-year ISI interval identified in the cover letter to the application dated February 24, 2022 (i.e., March 25, 2020, August 1, 2020, and March 25, 2021). Confirm the start and completion dates for the fourth 10-year ISI interval at ANO-2.

RAI-3

In ANO2-ISI-023, the licensee did not provide any discussion on procedure demonstration and personnel qualification for the ultrasonic testing (UT) performed on Examination Category B-D components in Table 1 of ANO2-ISI-023. Discuss whether the licensee utilized ASME Code, Section XI, Appendix VIII or ASME Code, Section V, as required by Appendix I of ASME Code, Section XI.

RAI-4

Given the reduced coverage obtained for the subject welds, discuss whether a system leakage test was performed in accordance with the ASME Code, Section XI, IWB-5220 during each refueling outage in the fourth 10-year ISI interval. If leakage tests were performed, provide the results of the testing.