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CNRO2026-00004

10 CFR 50.12

January 22, 2026

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

Subject: Request for Exemption from the Requirements of 10 CFR 50.55a(g)(4)(ii)

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

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

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

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

Pursuant to 10 CFR 50.12, "Specific exemptions," Entergy Operations, Inc. (Entergy), requests an exemption to the requirements of 10 CFR 50.55a(g)(4)(ii) and 10 CFR 50.55a(y) to update the American Society of Mechanical Engineers (ASME) Code of Record for the Section XI activity programs (e.g., Inservice Inspection (ISI), Repair/Replacement (RR), Pressure Test (PT), Containment ISI (CISI) and Non-Destructive Examinations (NDE)) for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), Grand Gulf Nuclear Station (GGNS), River Bend Station (RBS) and Waterford Steam Electric Station, Unit 3 (WF3). Entergy desires to have all its operating units' ASME Section XI activity programs on the same 10-year commence date and to the same edition and addenda of Section XI of the ASME Code. To accomplish this, Entergy requests an exemption to 10 CFR 50.55a(g)(4)(ii) and 10 CFR 50.55a(y) to extend the current ASME, Section XI ISI, CISI, R/R, PT and NDE program intervals by approximately 24 months for ANO-1, GGNS, RBS, and WF3.

Exemptions are requested for the remainder of each plant's extended ISI interval. The details of the 10 CFR 50.12 request are enclosed.

Entergy is not requesting an exemption to 10 CFR 50.55a(a)(ii) to use ASME Code Case N-921; however, applicable lessons learned from the approval of Code Case N-921 are applied in this request. Specifically, it was noted that the NRC's Final Rule noticed in the Federal Register reiterated the rationale underlying N-921 Condition 2 (Reference 1):

There are complications associated with extending the ISI interval mid-interval. For instance, licensees wanting to extend the ISI interval mid-interval would need to evaluate all NRC-approved alternatives to determine if they should be resubmitted, especially considering that NRC may have granted the alternative assuming a 10-year ISI interval.

Attached to the Enclosure is Entergy's evaluation of all the relief requests / requests for alternatives for the ASME Section XI activities for ANO-1, ANO-2, GGNS, RBS and WF3 for the current 10-year interval. Reviews of the approved relief request / request for alternative for the Entergy fleet have determined that the only item requiring additional attention is the GGNS request for alternative examination of Reactor Pressure Vessel (RPV) circumferential shell welds that will require resubmission for the Period of Extended Operation.

Review and approval of these exemptions is requested by August 1, 2026, to support the plan updates for GGNS, RBS and WF3.

There are no new regulatory commitments established in this submittal.

If there are any questions or if additional information is needed, please contact me at 601-368-5102.

Respectfully,

Phil Couture

PC/rwc

Reference:

Final Rule, American Society of Mechanical Engineers Code Cases and Update Frequency, 89 Federal Register 58039, dated July 17, 2024.

Enclosure: Description of Exemption Request

Attachments to Enclosure

1. Applicable ISI Program Relief Requests / Requests for Alternative for ANO-1
2. Applicable ISI Program Relief Requests / Requests for Alternative for ANO-2
3. Applicable ISI Program Relief Requests / Requests for Alternative for GGNS
4. Applicable ISI Program Relief Requests / Requests for Alternative for RBS
5. Applicable ISI Program Relief Requests / Requests for Alternative for WF3

cc: NRC Region IV Regional Administrator

NRC Senior Resident Inspector – ANO, GGNS, RBS, WF3

NRC Project Manager – ANO, GGNS, RBS, WF3, Entergy Fleet

Enclosure

CNRO2026-00004

Description of Exemption Request

DESCRIPTION OF EXEMPTION REQUEST

I. Description

In accordance with 10 CFR 50.12, "Specific exemptions," Entergy Operations, Inc. (Entergy), is requesting NRC approval of exemptions from 10 CFR 50.55a(g)(4)(ii) and 10 CFR 50.55a(y) requirements to update the American Society of Mechanical Engineers (ASME) Code of Record for the Section XI activity programs (e.g., Inservice Inspection (ISI), Repair/Replacement (R/R), Pressure Test (PT), Containment ISI (CISI), and Non-Destructive Examinations (NDE)) for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), Grand Gulf Nuclear Station (GGNS), River Bend Station (RBS) and Waterford Steam Electric Station, Unit 3 (WF3) (e.g., the Entergy fleet).

10 CFR 50.55a(g)(4)(ii) states in part *Applicable ISI Code: Successive code of record intervals*. Inservice examination of components and system pressure tests conducted during successive code of record intervals must comply with the requirements of the latest edition and addenda of the ASME Code incorporated by reference in paragraph (a) of this section no more than 18 months before the start of the code of record interval.

10 CFR 50.55a(y) defines the ISI interval as 10 years following the previous inspection interval by reference to IWA-2431 of the ASME Code, Section XI 2009 Addenda and later.

The exemption request, if granted, would allow ANO-1, GGNS, RBS, and WF3 to extend the current ASME, Section XI ISI, R/R, PT, CISI, and NDE program intervals by approximately 24 months. Entergy will continue to meet all requirements of the 2007 edition with the 2008 addenda and any applicable NRC conditions in 10 CFR 50.55a.

This exemption request once approved will allow Entergy to have all the ASME Section XI programs to the same edition and addenda of the ASME Code. In addition, it will allow Entergy to have a consistent re-baseline the pattern of ASME Code, Section XI ISI intervals.

Exemptions are requested for the remainder of each plant's extended ISI interval. The proposed exemption request does not impact the Inservice Testing (IST) or snubber programs which are implemented as part of the ASME Operation and Maintenance Code. The technical justification supporting the request is provided in the following sections.

II. Background

The current code of record for the referenced plants is outlined in Table below.

Plant	Current ISI Interval	Code of Record	Start Date	Current End Date
ANO-1	5 th	2007 edition with the 2008 addenda	May 31, 2017	May 20, 2027
ANO-2	5 th	2007 edition with the 2008 addenda	March 26, 2020	March 25, 2030
GGNS	4 th	2007 edition with the 2008 addenda	December 1, 2017	November 30, 2027
RBS	4 th	2007 edition with the 2008 addenda	December 1, 2017	November 30, 2027
WF3	4 th	2007 edition with the 2008 addenda	December 1, 2017	November 30, 2027

Entergy is required to update each unit's 120-month ISI program to the latest Edition and Addenda of the ASME Code, Section XI, approved by the NRC as referenced in 10 CFR 50.55a(a).

As can be seen in the table above, currently the Entergy fleet is using the same Code of Record. This required Entergy to request alternatives for ANO-2. See References 1 and 2. To eliminate the burden of preparing and reviewing similar requests in the future, Entergy is requesting an exemption to extend the current interval for ANO-1, GGNS, RBS and WF3 until November 30, 2029, approximately 24 months. The ANO-2 interval would be reduced by approximately 4 months, such that the interval would end on November 30, 2029. This termination is independent of any code allowed interval modifications allowed by ASME Code, Section XI, IWA-2430.

Although this request is not to utilize ASME Code Case N-921, there are several points worth mentioning that will be addressed in this request.

On July 17, 2024, the NRC issued a final rule that included new approved code cases and update frequencies (Reference 3). Amongst the modifications in the Final Rule were revisions to 10 CFR 50.55a(a)(3)(ii), which approves NRC Regulatory Guide (RG) 1.147, Revision 21, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," issued March of 2024 to be incorporated by reference into the regulation. RG 1.147, Revision 21, conditionally approved Code Case N-921. Code Case N-921 establishes a 12-year ISI interval for Inservice Inspection programs.

Code Case N-921 was approved subject to the following conditions:

- 1) The licensee's code of record for the ISI program must be the 2017 Edition of Section XI or later, in order to apply this code case.
- 2) This code case can only be implemented at the beginning of an ISI interval as part of a routine update of the ISI program.

- 3) This code case cannot be used to modify the examination schedules for augmented inspections under 10 CFR 50.55a(g)(6)(ii).
- 4) The exceptions of IWB-2411(a), IWC-2411(a), and IWD-2411(a) also apply to Table 1 of this code case.

This exemption request is to extend ISI intervals for ANO-1 GGNS, RBS, and WF3 mid-interval, not at the beginning of an interval and Entergy is requesting to remain on the current Code of Record, 2007 edition with the 2008 addenda. Based on these points, Entergy does not meet the first two conditions listed by the NRC to utilize Code Case N-921.

Entergy did note that the NRC Final Rule noticed in the Federal Register reiterated the rationale underlying N-921 Condition 2 (Reference 4):

There are complications associated with extending the ISI interval mid-interval. For instance, licensees wanting to extend the ISI interval mid-interval would need to evaluate all NRC-approved alternatives to determine if they should be resubmitted, especially considering that NRC may have granted the alternative assuming a 10-year ISI interval.

This extension will not alter the pattern of inspections at each site. All examinations required to be completed during the current interval will be completed prior to the current end date. The same pattern of inspections will be upheld in the time extension described in this letter. See Section III below for additional information regarding future examinations and acceptance criteria.

Attachments 1 through 5 to this Enclosure provides the status of the relief requests / requests for alternatives for ANO-1, ANO-2, GGNS, RBS and WF3, respectively.

Some of the requests included in Attachments 1 through 5 were approved for the current interval. The dates provided in these letters were estimated at the time the relief was submitted. Entergy has determined these requests are not required to be resubmitted as part of extending the interval for the applicable stations.

III. Basis for Approval of Exemption Request

In accordance with 10 CFR 50.12, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 50 which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. The Commission will not consider granting an exemption unless special circumstances are present.

As discussed below, this exemption request satisfies the provisions of 10 CFR 50.12.

a) Authorized by law

These exemptions would allow Entergy to align its current operating nuclear fleet to work to the same Code of Record and operate on the same ISI interval. The NRC acknowledged

the appropriateness of submitting an exemption in lieu of a relief request in response to public comments made during the NRC review and conditional approval of ASME Code Case N-921. Granting the proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, and will not present an undue risk to public health and safety and is consistent with the common defense and security. Therefore, the exemptions are authorized by law.

b) Will not present an undue risk to public health and safety

Any potential burden associated with aligning the ISI intervals for the Entergy fleet only impacts time and resources for managing the ISI programs and does not impact public health and safety. Therefore, these exemptions will not present an undue risk to public health and safety.

c) Consistent with the common defense and security

The proposed exemptions would allow Entergy to align the current operating nuclear fleet to work to the same Code of Record and has no relation to security. The proposed exemptions will not adversely affect Entergy's ability to physically secure the sites and facilities and to protect special nuclear material. Therefore, the common defense and security is not affected by these exemptions.

d) Special circumstances are present

In accordance with 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption to its regulations unless special circumstances are present.

- (ii) Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.

Entergy desires to have all current operating plants on the same Code of Record and start dates for the interval for ASME Section XI activities (e.g., ISI, R/R, PT, CISI, and NDE). This has been accomplished in the past where ANO-1, GGNS, RBS and WF3 would update to the latest approved edition of ASME Section XI as referenced in 10 CFR 50.55a and two alternative relief requests would be submitted in accordance with 10 CFR 50.55a(z)(2) to have the Entergy fleet operating to the same Code of Record. This was accomplished most recently in Reference 1 and 2.

Based upon the precedence of the referenced approved relief requests for current and previous inspection intervals, the staff understands the hardship of working to different ASME codes within one operating fleet. This exemption request is made to reduce regulatory burden with review of multiple requests that will be required to maintain the Entergy fleet on the same Code of Record.

As outlined above, the NRC expressed concerns that allowing mid-cycle implementation of Code Case N-921 would result in a "significant burden" and identified the specific concerns underlying this assertion:

- licensees would need to evaluate all NRC-approved alternatives to determine if they should be resubmitted

With respect to the need to evaluate previously approved alternates that were based on a 10-year ISI interval, this would not be a significant burden and in fact Entergy has already performed this evaluation. Entergy performed a review of all previously authorized alternatives (relief requests) for ANO-1, GGNS, RBS and WF3 and assessed the impact of extending the interval to November 20, 2029, on the technical basis supporting each alternative. The results of this assessment determined that there is no significant impact to the technical basis supporting any of the previously approved alternatives. The full assessment of each previously approved alternative and impact of transitioning to an extended interval on the supporting technical basis is included in the Attachments of this exemption request.

The proposed exemptions will allow implementation of the ASME 2007 edition with the 2008 addenda for the extended ISI intervals for the plants listed above. The proposed exemptions do not include an alternative to the ASME Section XI requirements to distribute examinations among the three inspection periods of the current interval. Examinations completed during the proposed extension will be done to the 2007 edition with the 2008 addenda (including acceptance criteria) but will not be credited to 3rd period compliance. The first and/or second outage scope, as applicable from the start of the current interval at each site, will be repeated during the requested extension for ISI, CISI and PT. All pressure tests that are typically performed outside of refueling outages will be completed between the end of the current interval and the end of the requested extension.

All examinations currently required will be completed prior to the end of the currently scheduled interval for all Entergy plants. Following completion of the current interval required examinations, each site will perform the same pattern of examinations from the first inspection period as discussed above.

All examinations will be completed for ANO-2 and terminating early will not affect completion of all currently required code examinations.

Therefore, because the concern identified by the NRC in establishing Condition 2 for the approval for use of Code Case N-921 has been addressed by Entergy, the underlying purpose of the rule would continue to be achieved when allowing the extension of the current ISI interval for ANO-1, GGNS, RBS, and WF3, the special circumstance of 10 CFR 50.12(a)(2)(ii) is present.

- (iii) Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated.

The Commission has explained that the application of Criterion iii, undue hardship, is narrow. As the Commission stated in the 1985 rule adopting the current exemption criteria, this special circumstance was "intended to provide equitable treatment to applicants or licensees who, because of some unusual circumstance, are affected in a manner different than that of other similarly situated licensees or applicants."

Entergy will, in fact, be subjected to undue hardship because of the requirement to update to a new code edition for some of its fleet, creating the hardship condition where multiple codes are required across the Entergy fleet.

Therefore, compliance with Section 50.55a(a)(3)(ii) would result in undue hardship and Special Circumstance 50.12(a)(2)(iii) is present.

- (vi) There is present any other other material circumstance not considered when the regulation was adopted for which it would be in the public interest to grant an exemption.

There are material circumstances that are present. The current rules in place of updating to the latest code of record do not include any provisions related to the hardship of having sites within one fleet operating to different editions of the ASME Code. As mentioned above, this hardship has been managed with a series of relief requests. See References 1 and 2.

On May 31, 2017, ANO-1, and on November 30, 2017, GGNS, RBS, and WF3, updated the respective ISI programs to the 2007 Edition through the 2008 Addenda of Section XI in accordance with the requirements of 10 CFR 50.55a(g)(4)(ii). Under the provisions of Reference 2, ANO-2 was approved to use ASME Section XI, 2007 Edition through the 2008 Addenda for the performance of ISI, R/R, PT, CISI, and NDE activities commencing on December 1, 2017, through the end of the fourth ISI interval in order to allow continued use of common Entergy procedures, processes, training, knowledge, and technical skills. This provision was limited to the remainder of the fourth ISI interval and does not apply to the fifth ISI interval.

Reference 2 permitted ANO-2 to continue the use of the 2007 edition with the 2008 addenda for the remainder of the fifth 10-year inspection interval: thereby allowing Entergy the ability to continue utilizing common Entergy procedures, processes, training, knowledge, and technical skills.

Based upon the interval dates for the Entergy plants, Entergy will be required to develop and maintain multiple separate and unique ASME Section XI programs. The requirements minimize the potential for using shared resources of other Entergy sites, present human factors concern when applying different criteria to the operating units and prevent the use of common site and fleet procedures.

Although many changes occurred in ASME Section XI between the 2007 Edition through the 2008 Addenda and the 2021 Edition, both editions continue to ensure an acceptable level of quality and safety. In addition, the changes were not incorporated to address a deficiency in the Code that adversely impacted safety. Note that the Augmented ISI requirements in 10 CFR 50.55a(g)(6)(ii) that have been deemed by the NRC as necessary to provide added assurance of structural reliability will continue to be met. Entergy will continue to comply with all applicable requirements and conditions mandated by 10 CFR 50.55a

Entergy believes that continued application of the 2007 Edition through the 2008 Addenda of ASME Section XI will enhance the effective management and implementation of the ASME Section XI programs. Approval of this request supports Entergy's ability to maximize efficiencies and optimizes the use of internal operating experience because five units will be utilizing common procedures, processes, training, and knowledge.

Therefore, there are material circumstances present and not considered when 10 CFR 50.55a(g)(4)(ii) was issued.

IV. Environmental Consideration

The proposed exemptions meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(25), because the proposed exemptions involve: (1) no significant hazards consideration; (2) no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (3) no significant increase in individual or cumulative public or occupational radiation exposure; (4) no significant construction impact; (5) no significant increase in the potential for or consequences from radiological accidents; and (6) the requirements involve requirements of an administrative nature. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need to be prepared in connection with the proposed exemptions.

A. No Significant Hazards Consideration Determination

For the reasons discussed below, Entergy concludes that the requested exemptions do not present any significant hazards, and therefore, consistent with 10 CFR 50.92, a finding of "no significant hazards consideration" is warranted.

1. The requested exemptions do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed exemptions would allow the Entergy fleet to end their ISI interval on a common date, allowing Entergy to update the ISI programs to a common edition of the ASME Code and retain common procedures for all five units. The requested exemptions have no effect on plant structures, systems, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed exemptions would not increase the likelihood of the malfunction of any plant SSC. The proposed exemptions would have no effect on any of the previously evaluated accidents in the ANO-1, ANO-2, GGNS, RBS or WF3 Updated Safety Analysis Reports. Ending the individual Entergy sites'

ISI program on a common date as contemplated under the exemptions will not affect the probability of occurrence of any previously analyzed accident. Therefore, the requested exemptions do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The requested exemptions do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed exemptions do not involve a physical alteration of the plants. No new or different type of equipment will be installed, and there are no physical modifications to existing equipment associated with the proposed exemptions. Similarly, the proposed exemptions will not physically change any SSCs involved in the mitigation of any accidents. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed exemptions do not create the possibility of a new accident as a result of new failure modes associated with any equipment or personnel failures. No changes are being made to parameters within which the Units are normally operated, or in the setpoints which initiate protective or mitigative actions, and no new failure modes are being introduced. Therefore, the proposed exemptions do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The requested exemptions do not involve a significant reduction in a margin of safety.

The requested exemptions do not alter the design basis or any safety limits for the plants. The proposed exemptions do not impact station operation or any plant SSC that is relied upon for accident mitigation. Therefore, they do not involve a significant reduction in a margin of safety.

For the reasons discussed above, Entergy concludes that the proposed exemptions present no significant hazards consideration, and, accordingly, a finding of "no significant hazards consideration" is justified.

- B. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

There are no changes in the types, characteristics, or quantities of effluents discharged to the environment associated with the requested exemptions. There are no materials or chemicals introduced into the Units that could affect the characteristics or types of effluents released offsite. In addition, the method of operation of waste processing systems will not be affected by the exemptions. The proposed exemptions will not result in changes to the design basis requirements of SSCs that function to limit or monitor the release of effluents. All the SSCs associated with limiting the release of effluents will continue to be able to perform their functions. Therefore, the proposed exemptions will not result in any significant change to the types or significant increase in the amount of any effluent that may be released offsite.

- C. There is no significant increase in individual or cumulative public or occupational radiation exposure.

The proposed exemptions do not involve any physical alterations to the plant configuration of the Units or any changes to the operation of the Units that could lead to a significant increase in individual or cumulative occupational radiation exposure.

- D. There is no significant construction impact.

No construction activities are associated with the proposed exemptions.

- E. There is no significant increase in the potential for or consequences from radiological accidents.

See the no significant hazards considerations discussion in Section A above.

- F. The requirements from which the exemptions are sought involve surety, insurance or indemnity requirements or other requirements of an administrative nature.

The underlying purpose of the requirements from which the exemptions are sought is to extend the five Entergy units' ISI programs beyond the 10-year update requirement and provide a common end date for the ISI programs, such that all the programs can be updated to the same ASME Code of Record. This is administrative in nature.

Accordingly, the requested exemptions meet the eligibility criterion for categorical exclusion, and therefore, the preparation of an environmental impact statement or environmental assessment is not required in this case.

V. Conclusion

Based on current ISI examination and testing requirements, the exemption requested will allow Entergy to better utilize resources while implementing the remaining examinations and tests across future outages and inspection periods while still meeting the purpose of the rule. Entergy will continue to meet the ASME Section XI requirements to distribute examinations among the remaining inspection periods completing all current interval examination requirements prior to the current end date and will repeat the first period examination requirements after the conclusion of the currently scheduled interval.

As demonstrated above, Entergy considers that this exemption request is in accordance with the criteria of 10 CFR 50.12. Specifically, the requested exemptions are authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. Additionally, special circumstances are present as previously described. Based on the nature of this exemption request, Entergy has concluded that granting this exemption will not influence the quality of human health or the environment.

VI. Reference

1. Entergy letter to NRC, "Request for Alternative ANO2-ISI-021 to Permit Continued Application of the 2007 Edition through the 2008 Addenda of the American Society of Mechanical Engineers (ASME) Section XI Requirements," ML18249A293, (2CAN091802), dated September 6, 2018.
2. NRC letter to Entergy, "Arkansas Nuclear One, Unit 2, Request for Alternative ANO2-ISI-021 to Permit Continued Application of the 2007 Edition through the 2008 Addenda of the ASME Code (EPID-L-LLA-0122)," ML19156A400, (2CNA09619), dated June 11, 2019.
3. Final Rule, American Society of Mechanical Engineers Code Cases and Update Frequency, 89 Fed. Reg. 58039 dated July 17, 2024.
4. NRC Responses to Public Comments, Final Rule: American Society of Mechanical Engineers Code Cases and Update Frequency, ML23291A328, dated March 2024.

Enclosure, Attachment 1

CNRO2026-00004

**Applicable ISI Program Relief Requests /
Requests for Alternative
for ANO-1**

Attachment 1 - Applicable ISI Program Relief Requests / Requests for Alternative for ANO-1					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
ANO1-ISI-024 (Note 1)	Request for Alternative from Volumetric / Surface Examination Frequency Requirements of American Society of Mechanical Engineers (ASME) Code Case N-729-1	April 28, 2014 / ML 14118A477	December 23, 2014 / ML14330A207	One-time use for the duration up to and including the 27 th refueling outage that commenced in April 2018.	There are no impacts as this relief has expired.
ANO1-ISI-026	Request for Alternative from Volumetric / Surface Examination Frequency Requirements of ASME Code Case N-729-1	June 17, 2016 / ML 16173A297	February 13, 2017 / ML17018A283	One-time use for the duration up to and including the refueling outage that commenced in April 2021.	There are no impacts as this relief has expired.
ANO1-ISI-033	Request for Alternative related to ASME Code Case N-729-4 Volumetric Examination Requirements	October 31, 2019 / ML 19304A290	April 23, 2020 / ML20107J317	One-time use for the duration up to and including the refueling outage that commenced in May 2021.	There are no impacts as this relief has expired.
ANO1-ISI-034	Request for Relief related to ASME Code Case N-770-5 Supplemental Examination Requirements	August 11, 2020 / ML20227A113	February 8, 2021 / ML21026A260	Until the fall 2022 refueling outage.	There are no impacts as this relief has expired.
ANO1-ISI-035	Request for Relief related to ASME Code Case N-729-6 Augmented Examination Requirements	May 31, 2022 / ML22151A322	May 24, 2023 / ML23142A106	Until the end of the current renewed operating license (May 20, 2034).	There are no impacts as this relief was approved for the remainder of the current renewed operating license.
ANO1-ISI-036	Achieving the ASME Code-required examination coverage for the subject welds is impractical.	August 24, 2022 / ML22236A500	June 21, 2023 / ML23166B090	For the fourth interval.	There are no impacts as this relief was for limited examinations.

Attachment 1 - Applicable ISI Program Relief Requests / Requests for Alternative for ANO-1					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
ANO1-ISI-037	Request for Alternative for Implementation of Extended Reactor Vessel ISI Interval	June 8, 2023 / ML23159A269	April 10, 2024 / ML24086A541	For the fifth and sixth 10-Year ISI Interval (May 20, 2034)	There are no impacts as the commitment is to perform the required inspections prior to end of the current renewed operating license (May 20, 2034).
EN-20-RR-003 (applicable to all five units of the Entergy fleet)	Proposed Alternative to Apply the Examination Volumes Described in ASME Code Case N-711-2	December 30, 2020 / ML20365A088	October 28, 2021 / ML21299A003	Until May 30, 2027.	There are no impacts as the use ASME Code Case N-711-2 has been incorporated into Table 2 of Regulatory Guide (RG) 1.147, Revision 21.
No relief request number (applicable to all five units of the Entergy fleet)	Use of Sub-article IWA-5120 of the 2017 Edition of the ASME Code, Section XI.	June 7, 2021 / ML21158A300	January 18, 2022 / ML22007A317	Remainder of the current interval.	There are no impacts. Entergy has notified the NRC that we will use the provisions of the 2017 code for IWA-5120 until such time that we update to the latest approved code in 10 CFR 50.55a. (CNRO-2021-00014, ML21158A300)
ANO1-ISI-24-01	Defer the Inservice inspection (ISI) of the steam generator welds and nozzle inner radii to the end of the operating licenses	June 6, 2024 / ML24158A389	April 29, 2025 / ML25105A064	Up to May 20, 2034	There are no impacts as this relief was approved for the remainder of the current renewed operating license.
ANO1-ISI-24-02	Alternative examination of pressurizer welds under Examination Category B-B, Item Numbers B2.11 and B2.12, and Examination Category B-D, Item Number B3.110 of the ASME Code, Section XI,	January 13, 2025 / ML25013A293	September 26, 2025 / ML25254A014	Up to May 20, 2034	There are no impacts as this relief was approved for the remainder of the current renewed operating license.

Attachment 1 - Applicable ISI Program Relief Requests / Requests for Alternative for ANO-1					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
ANO-CISI-001 (applicable to ANO-2 as well)	Use of Alternative Inspection Interval for the Pre-Stressed Concrete Containment Systems. Invoke the inspection interval of Subsection IWL-2421.	September 27, 2007 / ML072910229	September 25, 2008 / ML082490728	For all subsequent intervals	There are no impacts to this relief as this relief was retired with the approval of Request for Alternative ANO-CISI-002.
ANO-CISI-002 (applicable to ANO-2 as well)	Use of Alternative examination frequency for Item Numbers L2.10, L2.20, L2.30, L2.40 and L2.50	November 10, 2022 / ML22316A001	September 25, 2023 / ML23199A019	Until the end of the current renewed operating license (May 20, 2034).	There are no impacts as this relief was approved for the remainder of the current renewed operating license.

Note 1: Relief Requests ANO1-ISI-021, 022, 023, 025, 027, 028, 029, 030, 031, and 032 are for the fourth interval and therefore not applicable to this submittal.

Enclosure, Attachment 2

CNRO2026-00004

**Applicable ISI Program Relief Requests /
Requests for Alternative
for ANO-2**

Attachment 2 - Applicable ISI Program Relief Requests / Requests for Alternative for ANO-2					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
ANO2-ISI-021 (Note 2)	Alternative to continued use application of the American Society of Mechanical Engineers (ASME) Code, Section XI 2007 Edition / 2008 Addenda.	September 6, 2018 / ML18249A293	June 11, 2019 / ML19156A400	Approved for the fifth interval	There are no impacts as this relief would be retired at the end of the fifth inspection interval which is planned to be terminated early.
ANO2-ISI-022	Request for Alternative for the examination of the ANO-2 RVCH nozzles required by ASME Code Case N-729-6 as mandated by 10 CFR 50.55a(g)(6)(ii)(D).	November 24, 2020 / ML20329A202	July 9, 2021 / ML21168A056	Approved for the fifth interval	There are no impacts as this relief would be retired at the end of the fifth inspection interval which is planned to be terminated early.
EN-20-RR-003 (applicable to all five units of the Entergy fleet)	Proposed Alternative to Apply the Examination Volumes Described in ASME Code Case N-711-2	December 30, 2020 / ML20365A088	October 28, 2021 / ML21299A003	Until March 25, 2030.	There are no impacts as the use ASME Code Case N-711-2 has been incorporated into Table 2 of Regulatory Guide (RG) 1.147, Revision 21. In addition, ANO-2 will be terminating the interval early
No relief request number (applicable to all five units of the Entergy fleet)	Use of Sub-article IWA-5120 of the 2017 Edition of the ASME Code, Section XI.	June 7, 2021 / ML21158A300	January 18, 2022 / ML22007A317	Remainder of the current interval	There are no impacts. Entergy has notified the NRC that we will use the provisions of the 2017 code for IWA-5120 until such time that we update to the latest approved code in 10 CFR 50.55a. (CNRO-2021-00014 ML21158A300Reference)

Attachment 2 - Applicable ISI Program Relief Requests / Requests for Alternative for ANO-2					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
ANO2-ISI-24-01	Defer the Inservice inspection (ISI) of the steam generator welds and nozzle inner radii	June 6, 2024 / ML24158A389	April 29, 2025 / ML25105A064	Remainder of the current interval	There are no impacts as this relief was approved for the remainder of the current renewed operating license.
ANO2-ISI-24-02	Alternative examination of pressurizer welds under Examination Category B-B, Item Numbers B2.11 and B2.12, and Examination Category B-D, Item Number B3.110 of the ASME Code, Section XI,	January 13, 2025 / ML25013A293	September 26, 2025 / ML25254A014	Up to July 17, 2038.	There are no impacts as this relief was approved for the remainder of the current renewed operating license.
ANO2-ISI-24-02	Alternative Inservice Inspection of Nuclear Power Plant Components," Table IWB-2500-1, Examination Categories B-A and B-D,	July 19, 2024 / ML24201A052	July 21, 2025 / ML25192A094	Until the end of the current renewed operating license .	There are no impacts as this relief was approved for the remainder of the current renewed operating license
ANO2-RR-21-002	Relief Request, Half-Nozzle Repair of RVCH Penetration #46 (One cycle of operation)	November 5, 2021 / ML21309A007	November 9, 2021 / ML21314A121 (Verbal)	One cycle of operation, which is scheduled to end in the spring of 2023	There are no impacts as this relief has expired.

Attachment 2 - Applicable ISI Program Relief Requests / Requests for Alternative for ANO-2					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
ANO2-RR-23-001	Alternative to implement a half-nozzle repair of Control Element Drive Mechanism Nozzle #46 on the reactor vessel closure head (RVCH), which had previously been approved for one cycle of operation in 2022, be authorized for the current operating life of the plant	January 20, 2023 / ML23020A940	April 24, 2023 / ML23108A136	For the term of the current license term .	There are no impacts as the RVCH will be replaced during the Spring 2026 refueling outage.
ANO2-RR-24-001	Relief Request, Half-Nozzle Repair of RVCH Penetration #71	November 11, 2024 / ML24316A003	April 24, 2025 / ML25107A057	One operating cycle (Cycle 31), which is scheduled to end in spring 2026	There are no impacts as the RVCH will be replaced during the Spring 2026 refueling outage,
ANO2-PT-003	Alternative to perform visual examinations of specific Class 1 reactor coolant pressure boundary (RCPB) piping components under Class 2 system pressure testing conditions	June 29, 2021 / ML21180A435	April 18, 2022 / ML22104A108	Duration of the fifth 10-year ISI interval	There are no impacts as this relief would be retired at the end of the fifth inspection interval which is planned to be terminated early.
ANO-CISI-001 (applicable to ANO-1 as well)	Use of Alternative Inspection Interval for the Pre-Stressed Concrete Containment Systems. Invoke the inspection interval of Subsection IWL2421.	September 27, 2007 / ML072910229	September 25, 2008 / ML082490728	For all subsequent intervals	There are no impacts to this relief as this relief was retired with the approval of Request for Alternative ANO-CISI-002.

Attachment 2 - Applicable ISI Program Relief Requests / Requests for Alternative for ANO-2					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
ANO-CISI-002 (applicable to ANO-1 as well)	Use of Alternative examination frequency for Item Numbers L2.10, L2.20, L2.30, L2.40 and L2.50	November 10, 2022 / ML22316A001	September 25, 2023 / ML23199A019	Until the end of the current renewed operating license.	There are no impacts as this relief was approved for the remainder of the current renewed operating license.

Note 2: Relief Requests ANO2-ISI-20, 023, 024, 025, 026, 027, and 028 are for the fourth interval and therefore not applicable to this submittal.

Enclosure, Attachment 3

CNRO2026-00004

**Applicable ISI Program Relief Requests /
Requests for Alternative
for GGNS**

Attachment 3 - Applicable ISI Program Relief Requests / Requests for Alternative for GGNS					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
I-2-00001	Request for alternative examination of Reactor Pressure Vessel (RPV) circumferential shell welds ASME Code, Section XI Category B-A, Item B1.11) using the BWRVIP-05 report as a basis.	July 27, 2000 / ML003736664	April 11, 2001 / ML011020061	Original GGN operating license.	There are no impacts with the proposed extension. This relief has expired.
GG-ISI-020 (Similar to RBS-ISI-019)	Use Alternative by using Boiling Water Reactor Vessel and Internals Project (BWRVIP) Guidelines in Lieu of Specific ASME Code Requirements	March 15, 2017 / ML17074A625	September 29, 2023 / ML23270B993	Duration of the fourth Interval.	There are no impacts as this relief would continue into the extended interval. This relief was written prior to the commencement of the 4 th interval. The dates provided in the original submittal were estimated at the time the relief was submitted.
GG-ISI-021 (Similar to RBS-ISI-015)	Use alternative based on American Society of Mechanical Engineers (ASME) Code Case N-702, without the ASME Code Case-specified visual examination.	May 25, 2017 / ML17145A321	October 30, 2017 / ML17285A794	Duration of the fourth Interval.	There are no impacts as ASME Code Case N-702-1 has been incorporated into Table 1 of Regulatory Guide (RG) 1.147 Revision 21.
GG-ISI-022	Alternative to use the 2007 Edition through 2008 Addenda of the ASME Code subject to conditions in 10 CFR 50.55a(b) for ISI of the welds in pump casing and valve body.	June 28, 2017 / ML17179A360	August 31, 2017 / ML17235A533	Third interval which ended November 30, 2017.	There are no impacts as this relief has expired.
GG-ISI-023	Achieving the ASME Code-required examination coverage for the subject welds is impractical.	November 30, 2018 / ML18334A246	October 11, 2019 / ML19266A586	Third interval	There are no impacts as this relief was for limited examinations.

Attachment 3 - Applicable ISI Program Relief Requests / Requests for Alternative for GGNS					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
EN-20-RR-003 (applicable to all five units of the Entergy fleet)	Proposed Alternative to Apply the Examination Volumes Described in ASME Code Case N-711-2	December 30, 2020 / ML20365A088	October 28, 2021 / ML21299A003	Until November 30, 2026.	There are no impacts as the use ASME Code Case N 711-2 has been incorporated into Table 2 of RG 1.147, Revision 21.
No relief request number (applicable to all five units of the Entergy fleet)	Use of Sub-article IWA-5120 of the 2017 Edition of the ASME Code, Section XI.	June 7, 2021 / ML21158A300	January 18, 2022 / ML22007A317	Remainder of the current interval	There are no impacts. Entergy has notified the NRC that we will use the provisions of the 2017 code for IWA-5120 until such time that we update to the latest approved code in 10 CFR 50.55a. (CNRO2021-00014 ML21158A300)
GGNS-PT-001	Visually examine the section of Inboard Feedwater Leakage Control (FWLC) piping that experience Class 2 pressure in lieu of the pressure that corresponds to 100% rated reactor power, as required by ASME Section XI.	June 30, 2025 / ML25181A776	January 9, 2026 / ML26006A081	This relief will be utilized during the fourth interval only.	There is no impact as this relief request will expire at the end of the fourth interval.

Enclosure, Attachment 4

CNRO2026-00004

**Applicable ISI Program Relief Requests /
Requests for Alternative
for RBS**

Attachment 4 - Applicable ISI Program Relief Requests / Requests for Alternative for RBS					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
RBS-ISI-004	Request for alternative examination of Reactor Pressure Vessel (RPV) circumferential shell welds using the Boiling Water Reactor Vessel and Internals Project (BWRVIP) BWRVIP-05 report as a basis	August 24, 2005 / ML052410293	July 14, 2006 / ML061810463	Remainder of current operating license	There are no impacts as this relief was approved for the remainder of the current renewed operating license.
RBS-ISI-015 (Similar to GG-ISI-021) (Note 3)	Use alternative based on American Society of Mechanical Engineers (ASME) Code Case N-702.	November 30, 2009 / ML093380288	May 17, 2018 / ML18122A152	Fourth ISI interval from December 1, 2017, to August 29, 2025	There are no impacts as ASME Code Case N-702-1 has been incorporated into Table 1 of Regulatory Guide (RG) 1.147 Revision 21.
RBS-ISI-019 (Similar to GG-ISI-020)	Use Alternative by using BWRVIP Guidelines in Lieu of Specific ASME Code Requirements	February 13, 2018 / ML18045A151	September 29, 2023 / ML23270B993	Duration of the fourth Interval.	There are no impacts as this relief would continue into the extended interval. .
RBS-ISI-020	Reactor Vessel Closure Stud	March 10, 2025 / ML25069A746	July 18, 2025 / ML25183A360	From refueling outage RF23 until Mode 5 of refueling outage RF24.	There are no impacts to this relief since it will expire in 2027.
RBS-ISI-020	Request to forgo the surface examination of a reactor pressure vessel (RPV) closure head stud	March 10, 2025 / ML25069A746	March 13, 2025 / ML25072A282 (Verbal authorization)	For one cycle of operation from the current RF23 refueling outage until Mode 5 of the next refueling outage (RF24)	There are no impacts as this relief will expire in 2026.
RBS-ISI-021	Achieving the ASME Code-required examination coverage for the subject welds is impractical.	November 30, 2018 / ML18334A259	September 27, 2019 / ML19261A167	Third interval	There are no impacts as this relief was for limited examinations.

Attachment 4 - Applicable ISI Program Relief Requests / Requests for Alternative for RBS					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
EN-20-RR-003 (applicable to all five units of the Entergy fleet)	Proposed Alternative to Apply the Examination Volumes Described in ASME Code Case N-711-2	December 30, 2020 / ML20365A088	October 28, 2021 / ML21299A003	Until November 30, 2027.	There are no impacts as the use ASME Code Case N 711-2 has been incorporated into Table 2 of RG 1.147, Revision 21.
No relief request number (applicable to all five units of the Entergy fleet)	Use of Sub-article IWA-5120 of the 2017 Edition of the ASME Code, Section XI.	June 7, 2021 / ML21158A300	January 18, 2022 / ML22007A317	Remainder of the current interval	There are no impacts. Entergy has notified the NRC that we will use the provisions of the 2017 code for IWA-5120 until such time that we update to the latest approved code in 10 CFR 50.55a. (CNRO2021-00014 ML21158A300)

Note 3: Relief Request RBS-ISI-012, 013, 014, 016, 017, and 018 are for the third interval and not applicable to this submittal.

Enclosure, Attachment 5

CNRO2026-00004

**Applicable ISI Program Relief Requests /
Requests for Alternative
for WF3**

Attachment 5 - Applicable ISI Program Relief Requests / Requests for Alternative for WF3					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
W3-ISI-006 (Note 4)	Request to extend the second and third 10-year Inservice inspection (ISI) interval examinations of the reactor pressure vessel (RPV) welds (Category B-A) as well as the nozzle-to-vessel welds and inner radius sections (Category B-D)	September 18, 2008 / ML082660040	June 12, 2009 / ML091210375	Second 10-Year Interval in 2015.	There are no impacts as this relief has expired.
W3-ISI-023	ASME Code Case N-770-1 weld examination coverage requirements.	September 26, 2013 / ML13270A041	March 26, 2014 / ML14070A008	Until scheduled refueling outage in the fall of 2018; not to exceed 54 months at weld temperatures of 525°F or greater, between completion of subject weld volumetric examinations.	There are no impacts as this relief has expired.
W3-ISI-030	Alternative to ASME IWA-5211 Regarding Charging Pipe Visual Inspection	February 20, 2018 / ML18051B559	October 18, 2018 / ML18282A030	Until the end of the current interval	This relief was approved to the end of the current interval and extending the interval will not impact the approved hardship.
W3-ISI-031	Alternative to the requirements of the ASME Code Case N-770-2, Section 2500(a)	October 19, 2018 / ML18292A856	June 12, 2019 / ML19157A316	Fourth 10-year ISI interval	There are no impacts as this relief was approved up to the Spring 2019 outage (RF22). In addition, the frequency of future examinations for these components is included in ASME Code Case N-770-7.

Attachment 5 - Applicable ISI Program Relief Requests / Requests for Alternative for WF3					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
W3-ISI-032	Achieving the ASME Code-required examination coverage for the subject welds is impractical.	November 30, 2018 / ML18334A219	September 9, 2019 / ML19247B197	Third interval	There are no impacts as this relief was for limited examinations.
WF3-RR-19-1	Alternate weld overlay repair of the degraded dissimilar metal welds in the cold leg drain lines of the reactor coolant system	July 18, 2019 / ML19199A708	July 24, 2019 / ML19205A540 (Verbal authorization)	Until the end of refueling outage 23, which is scheduled for Fall 2020	There are no impacts as this relief has expired.
WF3-RR-24-01	Forgo ASME Code, Section XI examination requirements for the requested pressurizer welds.	March 18, 2024 / ML24078A374	February 19, 2025 / ML25041A281	Until the end of the current renewed operating license (December 18, 2044).	There are no impacts as this relief was approved for the remainder of the current renewed operating license.
WF3-RR-24-02	Forgo ASME Code Section XI examination requirements for the requested steam generator welds and nozzles.	March 18, 2024 / ML24078A376	February 20, 2025 / ML25041A302	Through the end of the current licensed operating life (December 18, 2044).	There are no impacts as this relief was approved for the remainder of the current renewed operating license.
EN-20-RR-003 (applicable to all five units of the Entergy fleet)	Proposed Alternative to Apply the Examination Volumes Described in ASME Code Case N-711-2	December 30, 2020 / ML20365A088	October 28, 2021 / ML21299A003	Until November 30, 2027.	There are no impacts as the use ASME Code Case N711-2 has been incorporated into Table 2 of Regulatory Guide (RG) 1.147, Revision 21.
No relief request number (applicable to all five units of the Entergy fleet)	Use of Sub-article IWA-5120 of the 2017 Edition of the ASME Code, Section XI.	June 7, 2021 / ML21158A300	January 18, 2022 / ML22007A317	Remainder of the current interval	There are no impacts. Entergy has notified the NRC that we will use the provisions of the 2017 code for IWA-5120 until such time that we update to the latest approved code in 10 CFR 50.55a. (CNRO2021-00014 ML21158A300 Reference)

Attachment 5 - Applicable ISI Program Relief Requests / Requests for Alternative for WF3					
Relief Request	Description	Submitted Date / ML Number	Approval Date / ML Number	Duration of Approval	Impacts of Interval Extension
W3-CISI-001	Relief from the requirements of the ASME Code, Section XI, for post-repair leakage inspection of the steel containment vessel	February 9, 2010 / ML100470056	May 18, 2010 / ML100850089	One-time alternative for the third 10-year ISI interval during the Cycle 17 refueling outage	There are no impacts as this relief has expired.
W3-CISI-002	Relief from the requirements of the ASME Code, Section XI, for post-repair leakage inspection of the steel containment vessel	July 27, 2011 / ML112150195	January 4, 2012 / ML113330137	One-time alternative for the third 10-year ISI interval during the Cycle 18 refueling outage	There are no impacts as this relief has expired.

Note 4: W3-ISI-024 was for the third interval and not applicable for this submittal. W3-ISI-025, 026, 027, 028, and 029 were never submitted.