



Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, Mississippi 39213-8298
Tel 601-368-5758

F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2004-00072

October 27, 2004

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

SUBJECT: Request No. CEP-IWE/IWL-001
Use of Subsequent ASME Code Edition and Addenda for Visual
Containment Examinations

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

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

Arkansas Nuclear One, Unit 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPR-6

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

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(g)(4)(iv), Entergy Operations, Inc. (Entergy) requests permission to use portions of the 1998 edition with 1999 and 2000 addenda of ASME Section XI for the conduct of visual containment examinations. Request CEP-IWE/IWL-001 (see enclosed) applies to Arkansas Nuclear One Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford 3 Steam Electric Station. This request is based on recent guidance provided in Regulatory Information Summary 2004-12.

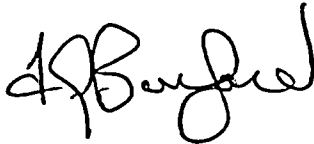
Entergy requests approval of the proposed amendment by 1/15/2005 in order to support the Arkansas Nuclear One, Unit 2 and Waterford Steam Electric Station, Unit 3 outages scheduled for March and April of 2005.

AO47

Should you have any questions regarding this submittal, please contact Bill Brice at (601) 368-5076.

This letter contains no commitments.

Very truly yours,

A handwritten signature in black ink, appearing to read 'FGB/WBB/bal', written in a cursive style.

FGB/WBB/bal

Enclosure: Request No. CEP-IWE/IWL-001

cc: (see next page)

cc: Mr. W. A. Eaton (ECH)
Mr. J. P. DeRoy (ECH)
Mr. J. S. Forbes (ANO)
Mr. P. D. Hinnenkamp (RBS)
Mr. J. E. Venable (W3)
Mr. G. A. Williams (GG)

Dr. Bruce S. Mallett
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

U. S. Nuclear Regulatory Commission
Attn: Mr. Thomas W. Alexion
MS O-7 D1
Washington, DC 20555-0001

U. S. Nuclear Regulatory Commission
Attn: Mr. Drew Holland
MS O-7 D1
Washington, DC 20555-0001

U.S. Nuclear Regulatory Commission
Attn: Mr. Nageswaran Kalyanam
MS O-7D1
Washington, DC 20555-0001

U. S. Nuclear Regulatory Commission
Attn: Mr. Bhalchandra Vaidya
MS O-7D1
Washington, DC 20555-0001

U.S. Nuclear Regulatory Commission
Attn: Mr. Michael K. Webb
MS O-7D1
Washington, DC 20555-0001

NRC Senior Resident Inspector
Arkansas Nuclear One
P. O. Box 310
London, AR 72847

NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Route 2 Box 399
Port Gibson, MR 39150

NRC Senior Resident Inspector
Waterford 3
P.O. Box 822
Killona, LA 70066-0751

NRC Senior Resident Inspector
River Bend Station
P. O. Box 1050
St. Francisville, LA 70775

ENCLOSURE

CNRO-2004-00072

CEP-IWE/IWL-001

10 CFR 50.55a Request Number CEP-IWE/IWL-001

Proposed Use of Subsequent ASME Code Edition and Addenda
for Visual Containment Examinations at Arkansas Nuclear One, Units 1 and 2,
Grand Gulf Nuclear Station, River Bend Station, and Waterford 3 Steam Electric Station

In accordance with RIS 2004-12 and 10 CFR 50.55a (g)(4)(iv), Entergy Operations, Inc. (Entergy) requests permission to use the 1998 edition with 1999 and 2000 addenda of ASME Section XI for the conduct of containment examinations at Arkansas Nuclear One, Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford 3 Steam Electric Station as detailed below.

1. ASME Code Components Affected:

Class MC Components, Liners of Class CC Containments, and Class CC components examined in the following ASME examination categories and item numbers:

<u>Category</u> (1992 Edition and Addenda)	<u>Item Numbers</u> (per 1992 Edition and Addenda)
E-A	E1.11, E1.12
E-C	E4.11, E4.12
L-A	L1.11, L1.12
L-B	L2.30

2. Applicable Code Edition and Addenda (Code of Record)

1992 Edition with 1992 Addenda of ASME Section XI, Subsections IWE and IWL and including approved requests for relief, requests for alternatives, and modifications set forth in 10 CFR 50.55a.¹

3. Proposed Subsequent Code Edition and Addenda

Entergy proposes adoption of the sections of the 1998 Edition with 1999 and 2000 Addenda of ASME Section XI, Subsection IWE and IWL, shown in the following table, as approved in 10 CFR 50.55a (b)(2)(viii) and 10 CFR 50.55a (b)(2)(ix) including related paragraphs of ASME Code, approved requests for relief, requests for alternatives, and modifications set forth in 10 CFR 50.55a as described below (67 FR 60520).

For the ASME item numbers identified in Section 1 of this submittal, examinations, including examinations required for repair or replacement, will be conducted as required under the proposed code as listed in the following table for the affected item number. Paragraphs of the later edition and addenda of code that will be applied to the program as a whole, regardless of the item number of the component, are listed as "Additional paragraphs from the 1998 Edition with 1999 and 2000 addenda being adopted".

<u>1992 Code Item Number</u>	<u>1998 Code Item Number</u>	<u>Particular Paragraphs from 1998 Edition with 1999 and 2000 Addendaⁱⁱ</u>
E1.11 and E1.12	E1.11	IWE-1231; IWE-1232; IWE-2100; IWE-2200; IWE-2300; IWE-2420; IWE-2500, IWE-2600, IWE-3100; IWE-3200; IWE-3400; IWE-3510.1; IWE-3510.2; Table IWE-2500-1 Category E-A Item E1.11
	E1.12	IWA-2200(a); IWA-2200(b); IWA-2210; IWA-2213; IWA-2215; IWA-2240; IWA-2300; IWE-1231; IWE-1232; IWE-2200; IWE-2320; IWE-2420; IWE-2500, IWE-2600, IWE-3100; IWE-3200; IWE-3400; IWE-3510.1; IWE-3510.2; Table IWA-2210-1; Table IWE-2500-1 Category E-A Item E1.12
E4.11	E4.11	IWA-2200(a); IWA-2200(b); IWA-2210; IWA-2211; IWA-2215; IWA-2240; IWA-2300; IWE-1231; IWE-1232; IWE-1241; IWE-1242; IWE-2200; IWE-2420; IWE-2500; IWE-2600; IWE-3100; IWE-3200; IWE-3400; IWE-3511.1; IWE-3511.2; Table IWA-2210-1; Table IWE-2500-1 Category E-C Item E4.11
E4.12	E4.12	IWA-2200(a); IWA-2200(b); IWA-2230; IWA-2232; IWA-2240; IWA-2300; IWE-1231; IWE-1232; IWE-1241; IWE-1242; IWE-2200; IWE-2420; IWE-2500; IWE-2600; IWE-3100; IWE-3200; IWE-3400; IWE-3511.3; Table IWE-2500-1 Category E-C Item E4.12; Table IWE-2500-2
L1.11	L1.11	IWA-2200(a); IWA-2200(b); IWA-2210; IWA-2240; IWA-2300; IWL-2230; IWL-2310(a)-(c) and (e) ⁱⁱⁱ ; IWL-2410; IWL-2510; IWL-3111; IWL-3112; IWL-3113; IWL-3211; IWL-3212; IWL-3213; IWL-4220(c); IWL-5250; Table IWL-2500-1 Category L-A Item L1.11
L1.12	L1.12	IWA-2200(a); IWA-2200(b); IWA-2210; IWA-2240; IWA-2300; IWL-2230; IWL-2310(a)-(c) and (e) ^{iv} ; IWL-2410; IWL-2510; IWL-3111; IWL-3112; IWL-3113; IWL-3211; IWL-3212; IWL-3213; IWL-4220(c); IWL-5250; Table IWL-2500-1 Category L-A Item L1.12
L2.30	L2.30	IWA-2200(a); IWA-2200(b); IWA-2210; IWA-2211; IWA-2215; IWA-2240; IWA-2300; IWL-2230; IWL-2310(a)-(c) and (e); IWL-2524.1; IWL-3221.3; IWL-3222; IWL-3223; IWL-4220(c); IWL-5250; Table IWL-2500-1 Category L-B Item L2.30

<u>1992 Code Item Number</u>	<u>1998 Code Item Number</u>	<u>Particular Paragraphs from 1998 Edition with 1999 and 2000 Addenda"</u>
Additional paragraphs from the 1998 Edition with 1999 and 2000 addenda being adopted.		IWE-2500 (references to Table IWE-2500-1 will refer to the code of record unless specifically listed above.); IWE-5000; IWL-2320; IWL-3300; IWL-4220 (replaces IWL-4210 from the code of record); IWL 5250

4. Related Requirements

10 CFR 50.55a (b)(2)(viii) states in part, "Licensees applying the 1998 Edition with the 1999 and 2000 Addenda shall apply paragraphs (b)(2)(viii)(E) and (b)(2)(viii)(F) of this section." These paragraphs will be implemented for the code paragraphs listed in Section 3.

10 CFR 50.55a (b)(2)(ix) states in part, "Licensees applying the 1998 Edition through the latest edition and addenda incorporated by reference in paragraph (b)(2) of this section, shall satisfy the requirements of paragraphs (b)(2)(ix)(A), (b)(2)(ix)(B), and (b)(2)(ix)(F) through (b)(2)(ix)(I) of this section." These paragraphs will be implemented for the code paragraphs listed in Section 3.

The table in Section 3 above lists the paragraphs containing the primary requirements and related requirements of the 1998 code with 1999 and 2000 addenda as modified by 10 CFR 50.55a. The code of record will continue to be used for paragraphs not listed in the table as well as for inspections of ASME items not listed in this table.

5. Duration of Proposed Request

This request will continue to be valid until the next 10 year update of the containment inservice inspection program at each site.

End Notes:

ⁱ SERs for current approved requests for relief and requests for alternative affecting the Containment Inservice Inspection Program may be found in letters from the NRC to Mr. Randy Hutchinson dated 5-11-1999 and 6-2-1999 from the NRC to Mr. Michael Kansler dated 1-13-2000, and from the NRC to Mr. William Eaton Dated 10-5-2000. These requests allow the use of remote inspection techniques for completion of IWL examinations, use of general visual and detailed visual concrete examinations in lieu of VT-3C and VT-1C examinations, and use of Appendix J pressure tests as an alternative for visual examination of seals and gaskets. Additionally the requests provide relief from requirements for re-examination of repaired or replaced components (pre-service examination is still required), and relief from requirements for bolt torque and tension examinations.

ⁱⁱ Where 10CFR50.55a limits the use of owner defined requirements or specifies use of VT-1 or VT-3 examination in lieu of general or detailed visual examinations, the appropriate paragraphs of IWA are listed to allow adoption of the 10CFR50.55a modifications and limitations.

ⁱⁱⁱ IWL-2310(d) is not being adopted because of the specific restriction on it's use in 10CFR50.55a(b)(2)(viii)(F).

^{iv} IWL-2310(d) is not being adopted because of the specific restriction on it's use in 10CFR50.55a(b)(2)(viii)(F).