

From: [Wang, Alan](#)
To: [Perino, Christina](#); [SEITER, JEFFERY ALAN](#)
Cc: [Burkhardt, Janet](#); [Chen, Qiao-Lynn](#); [Audrain, Margaret](#)
Subject: Grand Gulf Nuclear Station Request for Additional Information (RAI) Regarding Relief Request ISI-14, 15, 16 (TAC Nos. ME7592, ME7593, and ME7594)
Date: Thursday, August 23, 2012 10:42:35 PM

Jeff and Christina,

By letter dated November 15, 2011, Agencywide Documents Access and Management System (ADAMS) Accession Number ML113200448, Entergy Nuclear Operations, Inc (the licensee) submitted relief requests GG-ISI-14, GG-ISI-015, and GG-ISI-016 for the U.S. Nuclear Regulatory Commission's (NRC) review and approval. The request is asking for relief from certain ASME Section XI examination requirements for the second 10-year inservice inspection (ISI) interval, in which the code of record is the 1992 edition, 1993 addenda. 10 CFR 50.55a(g)(5)(iii) states that when licensees determine that conformance with ASME Code requirements is impractical at their facility; they shall submit information to support this determination. The NRC will evaluate such requests based on impracticality, and may impose alternatives, giving due consideration to public safety and the burden imposed on the licensee.

The NRC staff has determined that the following additional information is needed to complete our review of this request. This request for additional information (RAI) was discussed with Mr. [Jeffrey Seiter](#), on August 23, 2012, and it was agreed that a response would be provided by October 5, 2012. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1445 or via e-mail at Alan.Wang@nrc.gov.

The following RAIs are related to your request in letter dated November 15, 2011:

GG-ISI-014

1. Do VT2 examinations currently represent the state of the art relative to examination sensitivity and dose minimization or would alternate technologies such as remote video provide better examinations
2. Please estimate the difference in dose incurred during the second 10 year inspection interval between performing the examinations required by code and the VT2 exam which was actually performed.
3. In the licensee's submittal dated November 15, 2011, it was noted in the cover letter that the relief was submitted beyond the one year time frame specified under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iv) and that the omission had been address in the Entergy's Correction Action Process.
 - a. Provide an action number, if one exists and date of the action.
 - b. What was the reason for the lateness in submitting the requests to the NRC?

GG-ISI-015

1. Provide materials specifications for the welds and associated components (e.g., pumps and valves) for which relief is requested. Discuss which piping systems these

welds belong to.

2. Clarify whether these welds were inspected during fabrication. Provide the date of fabrication and pre-service (PSI) inspection, and inspection methods. Discuss any fabrication flaws detected and repaired.
3. Clarify whether these welds have ever been inspected in service in accordance with the requirements of the ASME Code, Section XI, since commercial operation. If yes, discuss the inspection results. If no, provide technical justification for the assurance of the integrity of these welds until the next scheduled inspection.
4. NRC Information Notice (IN) 2011-04, "Contaminants and Stagnant Conditions Affecting Stress Corrosion Cracking in Stainless Steel Piping in Pressurized water Reactors," discusses potential stress corrosion cracking (SCC) in stainless steel piping.
 - a. Provide operating pressure and temperature that these welds are exposed to.
 - b. Discuss the potential for SCC in these welds.
5. In the licensee's submittal dated November 15, 2011, it was noted in the cover letter that the relief was submitted beyond the one year time frame specified under 10 CFR 50.55a(g)(5)(iv) and that the omission had been address in the Entergy's Correction Action Process.
 - a. Provide an action number, if one exists and date of the action.
 - b. What was the reason for the lateness in submitting the requests to the NRC?

GG-ISI-016

1. Provide materials specifications for pump support.
2. Clarify whether these components were inspected during fabrication. Provide the date of fabrication and pre-service (PSI) inspection, and inspection methods. Discuss any fabrication flaws detected and repaired.
3. Clarify whether these components have ever been inspected in service in accordance with the requirements of the ASME Code, Section XI, since commercial operation. If yes, discuss the inspection results. If no, provide technical justification for the assurance of the integrity of these components until the next scheduled inspection.
4. In the licensee's submittal dated November 15, 2011, it was noted in the cover letter that the relief was submitted beyond the one year time frame specified under 10 CFR 50.55a(g)(5)(iv) and that the omission had been address in the Entergy's Correction Action Process.
 - a. Provide an action number, if one exists and date of the action.

b. What was the reason for the lateness in submitting the requests to the NRC?

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