

**Guzman, Richard**

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**From:** Guzman, Richard  
**Sent:** Tuesday, April 26, 2016 9:53 AM  
**To:** DAVANT, GUY H  
**Cc:** Eng, Anders Yuk (AEng@entergy.com); WEICKS, JOSEPH G (JWEICKS@entergy.com)  
**Subject:** Request for Additional Information - Entergy Fleet EN-ISI-15-1 - Proposed Alternative to Maintain ISI-Related Activities to the 2001E/2003A of ASME Section XI Code (CAC Nos. MF7133 - MF7136)

Guy,

The NRC staff has reviewed the information provided in the subject fleet relief request dated November 20, 2015 (ADAMS Accession No. ML15329A305) and has determined that additional information is needed to complete its review. Shown below are the NRC staff's request for additional information questions. Please provide your formal response by May 31, 2016. If you have any questions, please contact me.

Thanks,

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REQUEST FOR ADDITIONAL INFORMATION  
REQUEST FOR RELIEF EN-ISI-15-1  
INSPECTION AND COINTAINMENT INSERVICE INSPECTION RELATED ACTIVITIES ON THE 2001  
EDITION THROUGH 2003 ADDENDA OF THE ASME SECTION XI FOR  
ENTERGY NUCLEAR OPERATIONS, INC.  
ARKANSAS NUCLEAR ONE, UNIT 1, FIFTH 10-YEAR INSERVICE INSPECTION INTERVAL  
GRAND GULF NUCLEAR STATION, FOURTH 10-YEAR INSERVICE ISI INTERVAL  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT, FIFTH 10-YEAT ISI INTERVAL  
WATERFORD STEAM ELECTRIC STATION, UNIT 3, FOURTH 10-YEAR ISI INTERVAL  
ENTERGY NUCLEAR OPERATIONS, INC.  
DOCKET NOS. 50-313, 50-416, 50-333, AND 50-382

By letter dated November 20, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML15329A305), Entergy Nuclear Operations, Inc. (Entergy, the licensee) requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV Code). Relief request EN-ISI-15-1 pertains to maintaining inservice inspection (ISI) and containment inservice inspection (CII) Repair & Replacement (R&R), pressure testing (PT), and nondestructive testing (NDE) programs related activities on the 2001 Edition through 2003 Addenda of the ASME Code, Section XI, during fifth 10-year ISI interval for the Arkansas Nuclear One, Unit 1 (ANO-1), Fourth 10-year ISI interval for Grand Gulf Nuclear Station (GGNS), Fifth 10-year ISI interval for James A. Fitzpatrick Nuclear Plant (JAF), and Fourth 10-year ISI interval for Waterford 3 Steam Electric (WF3).

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

1. The licensee states that the proposed duration of this alternative request is from January 1, 2017 through November 30, 2017. On December 1, 2017, Entergy intends to update the Code of Record (ASME Section XI, 2007 Edition/2008 Addenda) for NDE, PT, and R&R programs to the latest Edition/Addenda of the ASME Section XI approved by the NRC in 10 CFR 50.55a(a)(1)(ii) for the entire fleet. Please discuss which portions of the Section XI ASME Code will be updated. Will only the sections that have currently been requested to be retained at the 2001E/2003A be updated to the latest edition, or will all sections be updated after November 30, 2017?
2. Please confirm that from December 1, 2017, all the subject plants will be using NDE, PT and R&R programs based on ASME Section XI, 2007 Edition with 2008 Addenda.
3. In Footnote (5) on page 2 of the Enclosure 1 to the relief request, the licensee stated, "Entergy will not apply the IWB-3514 acceptance standards of the 2001 Edition/2004 Addenda to planar surface flaws in UNS N06600, N06682, or W86182 materials or austenitic stainless steels..."
  - a. Please clarify whether there is a typographical error in quoting UNS N06682 and provide the correct material type;
  - b. Otherwise, provide a description of UNS N06682 material and state where it is used at ANO-1, GGNS, JAF, and WF3.
4. Discuss which edition and addenda of the ASME Code, Section XI, will be used for the non-mandatory appendices during January 1, 2017 through November 30, 2017 and provide justification.
5. Footnote (6) on page 2 of the Enclosure 1 to the relief request EN-ISI-15-1 states that, "...snubber preservice and inservice examination and testing will be performed with Subsection ISTD of the ASME Operation and Maintenance (OM) Code, 2004 Edition/2006 Addenda..." For snubber inservice examination and testing, 10 CFR 50.55a(b)(v) allows the use of ASME OM Code in lieu of the ASME Section XI. Whereas, the snubbers repair and replacements are still under ASME Section XI. Please provide (1) the Edition and Addenda of the ASME Section XI, which will be used for repair and replacement of snubber at various plants (ANO-1, GGNS, JAF, and WF3), and (2) the ASME OM Code or ASME Section XI with edition and addenda which are being currently used for snubber examination and testing at various plants (ANO-1, GGNS, JAF, and WF3).
6. Footnote (9) on page 2 of the Enclosure 1 states that IWF-5000 was deleted from Subsection IWF in the 2006 Addenda of ASME Section. See RAI 5 above and provide a response accordingly.
7. For the first bullet of Footnote (8) on page 2 of Enclosure 1, please clarify whether there is a typographical error in quoting the regulation 10 CFR 50.55a(xxiv) instead of 10 CFR 50.55a(b)(2)(xxiv).
8. In the Attachment to the relief request on page 1, the table specifies various sections of Article IWL for plants ANO-1, GGNS, JAF, and WF3. These plants are either PWRs or BWRs. Please specify which plants will be using IWL for concrete examination.
9. Section 5 of the submitted relief request provides the proposed duration of this alternative for ANO-1, GGNS, JAF, and WF3 is from the start date of the new 10-year ISI interval for each plant through November 30, 2017 as shown below:

| Plant | ISI Interval | Duration of Relief Request |                       | ISI Interval End Date |
|-------|--------------|----------------------------|-----------------------|-----------------------|
|       |              | ISI Interval Start Date    | ISI Interval End Date |                       |
| ANO-1 | 5th          | 5/31/2017                  | 11/30/2017            | 5/30/27               |
| GGNS  | 4th          | 6/2/2017                   | 11/30/2017            | 6/1/27                |
| JAF   | 5th          | 1/1/2017                   | 11/30/2017            | 12/31/26              |
| WF3   | 4th          | 7/1/2017                   | 11/30/2017            | 6/30/27               |

As shown in the above table, Entergy requested to extend the use of the 2001 edition through 2003 addenda beyond the current 10-year ISI intervals at various Entergy plants (ANO-1, GGNS, JAF, and WF3) up to November 30, 2017. Please explain how previously NRC approved relief requests for the previous 10-year ISI intervals at these Entergy plants will be addressed for the extended period up to November 30, 2017.

10. In a letter dated November 26, 2014 (ADAMS No. ML14342B001), Entergy submitted a similar relief request in PRR-26 for Pilgrim Nuclear Power Station. In this request (PRR-26), Section 5, "Duration of Proposed Alternative," it states, in part, that "Entergy proposes to maintain standardization of the corporate administered R&R, PT, NDE programs across its entire nuclear fleet at 2001 Edition through 2003 Addenda through December 2017." However, in the November 20, 2015, relief request EN-ISI-15-1, Section 6, "Duration of Proposed Alternative," it states, in part, that Entergy proposes to maintain standardization of the of its corporately administered NDE, PT and R&R programs across its entire nuclear fleet at 2001 Edition through 2003 Addenda through November 2017.

Please explain the inconsistency between the stated November 2017 and December 2017 dates. If needed, please make appropriate changes.