Entergy
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2CAN039303

U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Withdrawal of Inservice Inspection Relief
Requests Submitted on January 12, 1990

Gentlemen:

In letter 2CAN019005 (dated January 12, 1990), Entergy Operations submitted a summary of the second 10-year interval for the Inservice Inspection (ISI) Program for Arkansas Nuclear One, Unit 2 (ANO-2) including three relief requests. By letter dated June 7, 1990 (2CNA069002), the NRC requested additional information and/or clarifications necessary to complete their review. In Entergy Operations' response to the Request for Additional Information (RAI), dated January 15, 1991 (2CAN019103), it was indicated that revised relief requests addressing comments in the RAI would be submitted by March 26, 1993.

ANO's current ISI program requires relief requests for the second 10-year interval to be submitted after the conclusion of each Code inspection period for those examinations attempted during the period for which relief is desired. Since the examinations had not been attempted when the relief requests were originally submitted, Entergy Operations is withdrawing these three relief requests. The relief requests, as determined necessary, will be resubmitted after the end of the period.

Even though Entergy Operations is withdrawing the subject relief requests, the attached information is being provided to address the NRC Staff's comments contained in the June 7, 1990 RAI. We believe that this additional information will be helpful in communicating our understanding of the Staff's comments, and will support our continuing efforts in the final resolution of these matters. Included in the attachment are a summary of each relief request withdrawn, NRC's comments from the June 7, 1990 RAI, and Entergy Operations' observations.

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Should you have any questions regarding this submittal, please contact me.

Very truly yours,

James J. Fisicaro

James J. Fisicaro
Director, Licensing

Attachment

cc: Mr. James L. Milhoan
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ATTACHMENT

OBSERVATIONS CONCERNING RAI FOR RELIEF REQUESTS

1. Summary of ANO-2 ISI Relief Request No. 1 (January 12, 1990)

Relief was requested from performing the Code-required surface examination of select Class 1 piping welds located inside the primary shield wall that are inaccessible for examination. ANO proposed to volumetrically examine the outside surface of these welds from the inner diameter (ID) surface during the performance of automated reactor vessel examinations.

NRC Response (June 7, 1990)

The NRC stated that this proposal could be considered acceptable provided that; 1) the volumetric examination includes the entire weld volume and heat affected zone instead of only the inner one-third of the weld, and; 2) the testing instrumentation and procedures are demonstrated to be capable of detecting outer diameter (OD) surface-connected defects in the circumferential orientation of a test block containing cracks (not machined notches).

Entergy Observations

The above NRC stipulation that the testing instrumentation and procedures have a proven detection capability as demonstrated on actual cracks in a test block is analogous to the fundamental principle of Appendix VIII of the 1989 Edition of the ASME Code, 1989 Addenda. We understand and appreciate the Staff's concern. ANO will work with the industry to better define an inspection approach. At a later date, after ongoing industry efforts are better defined, Entergy will re-file the relief request.

2. Summary of ANO-2 ISI Relief Request No. 2 (January 12, 1990)

Relief was requested from performing a volumetric examination from the nozzle side of all main reactor coolant loop piping branch connection welds.

NRC Response (June 7, 1990)

The NRC stated that they had recently noticed significant improvements in the techniques being used for volumetric examinations from the branch connection side of Class 1 welds. ANO was requested to list the specific welds for which relief is requested and the percentage of the Code-required volumetric examination that can and will be performed for each of the subject welds, and to discuss what efforts have been made to perform the Code-required volumetric examination from the branch connection side of the subject welds.

Entergy Observations

Entergy is evaluating each selected Class 1 piping branch connection weld on a case-by-case basis and will perform a volumetric examination to the maximum extent allowed by component geometry and material restrictions. The percentage of the Code-required coverage achieved will be calculated for each selected branch connection weld after the performance of the volumetric examinations and will be reported to the NRC when relief is requested. The significant improvements mentioned by the staff are believed to be from examinations performed on forged stainless steel branch connections without ID cladding and are not applicable to ANO-2. However, we will continue to work to define optimum inspection techniques for our applications, and will follow industry improvements in this area.

3. Summary of ANO-2 ISI Relief Request in Tabular Format (January 12, 1990)

Relief was requested for performing limited examinations of numerous components.

NRC Response (June 7, 1990)

The NRC stated that the relief requests should be revised as several relief requests in a format similar to those discussed above, and that since the relief requests in the table are in the form of a summary, adequate descriptive and detailed technical information is not provided. The NRC also listed the minimum justification requirements for requesting relief.

Entergy Observations

Entergy will submit future relief requests for every component examination performed where an examination coverage percentage of 90% is not achieved. The percentage of Code coverage attained will be calculated for the applicable components and this information, as well as the other NRC minimum justification requirements listed in the RAI, will be included when requesting relief.