



**Entergy
Operations**

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W3P90-1163

A4.05

QA

September 6, 1990

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Ten Year Inservice Inspection Program
Relief Requests

Gentlemen:

In accordance with 10CFR50.55a(g)(5)(iii), Entergy Operations, Inc. hereby submits by attachment seven relief requests which are associated with the Ten Year Inservice Inspection Program. Six of these relief requests are revisions to existing relief requests and one is a new relief request. Furthermore, four relief requests have been deleted. The revisions/deletions which have been made resulted largely from the NRC Safety Evaluations (SEs) which were submitted to Waterford 3 on June 6, 1989. Also, Request for Relief No. ISI-001 has been updated to reflect information obtained during our second and third refueling outages.

The attachment to this letter includes a brief summary of the changes, and provides the new and revised relief requests. The changes to the relief requests have been noted by revision bars in the right margin.

It is hereby requested that the ASME Section XI code relief requested be granted pursuant to Section 50.55a(g)(6)(i) of 10CFR50.

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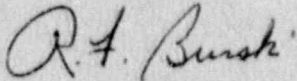
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Should you have any questions, please contact Ms. B.R. Loetzerich at (504) 739-6636.

Very truly yours,



RFB/BRL/ssf

Attachment

cc (w/attachment): Mr. R.D. Martin, NRC Region IV
NRC Resident Inspectors Office

cc (w/o attachment): Messrs. D.L. Wigginton, NRC-NRR
E.L. Blake
W.M. Stevenson
R.B. McGehee

SUMMARY OF CHANGES TO ASME SECTION XI RELIEF REQUESTS

<u>RELIEF REQUEST NUMBER</u>	<u>DESCRIPTION</u>	<u>CHANGE</u>
ISI-001	Limited Examination of Welds	Revised request to update exam results obtained during Refuel 2 and 3.
ISI-002	Supplemental Examinations for Intergranular Stress Corrosion Cracking (IGSCC)	No changes.
ISI-003	VT-3 Examinations on Pump and Valve Internals	Revised request to address the internal examination of pump casings (Code Item B12.20). Pump casings had previously been addressed as part of Relief Request ISI-004, however, due to the similarities involved with internal examination of valve bodies, it was combined with ISI-003.
ISI-004	Reactor Coolant Pump Casing Welds (DELETED)	Waterford 3 has elected to withdraw this request which addressed the internal examination of pump casings and volumetric examination of pump casing welds. Internal examinations of pump casings is now addressed in ISI-003 (see above). For pump casing welds, this request requested to volumetrically examine the casing welds only if the pump was disassembled for maintenance. However, per the Safety

SUMMARY OF CHANGES TO ASME SECTION XI RELIEF REQUESTS

<u>RELIEF REQUEST NUMBER</u>	<u>DESCRIPTION</u>	<u>CHANGE</u>
ISI-004 (Cont'd)	Reactor Coolant Pump Casing Welds (DELETED)	Evaluation, the welds would require a volumetric exam at the end of the interval if the pumps were not disassembled for maintenance. Since Section XI allows the deferral of this exam until the end of the interval, no relief request is necessary.
ISI-005	Categorization of IWD into IWF (DELETED)	This request has been deleted. It addressed the categorization of IWD portions of component supports into IWF. The Safety Evaluation stated that this was acceptable and that no Relief Request is necessary. Therefore, Section 4.1 of the Ten Year ISI Program has been revised to address this and a figure has been included in Section 4.4 (Figure 1D) for clarification.
ISI-006	Support Access Partially or Completely Blocked by Non-Removable Thermal Insulation	Revised to incorporate the examination of all nonexempt component supports within the Chilled Water system. Also, Request for Relief No. ISI-009 which addressed partial blockage of component supports within the Chilled Water system was combined with ISI-006 which previously only addressed total blockage of supports. These changes were based on the Safety Evaluation,

SUMMARY OF CHANGES TO ASME SECTION XI RELIEF REQUESTS

<u>RELIEF REQUEST NUMBER</u>	<u>DESCRIPTION</u>	<u>CHANGE</u>
ISI-006 (Cont'd)	Support Access Partially or Completely Blocked by Non-Removable Thermal Insulation	<p>which stated to select an alternate support similar in type, design and function for each support which was partially or completely blocked. However, due to the amount of supports within the Chilled Water system which were partially or completely blocked by non-removable insulation, Waterford 3 has elected to examine 100% (134) of the nonexempt component supports within this system from the insulation surface to the building structure. Therefore, an additional 61 supports were added to the Class 3 "Total Selected for Examination" column of Examination Table F-C in the Ten Year ISI Program. This is explained further in the Relief Request.</p>
ISI-007	Supports in Penetration with Fire Seal	<p>Revised to select an additional support similar in type, design and function for each support listed except as noted in the Relief Request. This change added 3 Class 2 component supports and 8 Class 3 component supports to the "Total Selected for Examination" column of Examination Table F-C in the Ten Year ISI Program.</p>

SUMMARY OF CHANGES TO ASME SECTION XI RELIEF REQUESTS

<u>RELIEF REQUEST NUMBER</u>	<u>DESCRIPTION</u>	<u>CHANGE</u>
ISI-008	Supports in Penetration (DELETED)	The supports listed in this request have been transferred to ISI-007 and therefore ISI-008 has been deleted. Relief Request ISI-007 identifies the supports which are in penetrations closed off by fireseals whereas ISI-008 identified supports which were inside penetrations without fireseals. A walkdown of the supports identified in ISI-008 revealed that the penetrations had been closed off by fireseals since the previous exam. Therefore, the supports were moved to ISI-007.
ISI-009	Supports Partially Blocked by Non-Removable Thermal Insulation (DELETED)	This request has been incorporated into ISI-006 due to the similarities between the two requests. See change of ISI-006 for additional information.
ISI-010	Supports Partially Blocked by Fire/Heat Insulation	Revised to reflect that all supports similar in type, design and function as those listed in the relief request have been selected for examination. Therefore, no alternate supports can be examined in lieu of these supports.

SUMMARY OF CHANGES TO ASME SECTION XI RELIEF REQUESTS

<u>RELIEF REQUEST NUMBER</u>	<u>DESCRIPTION</u>	<u>CHANGE</u>
ISI-011	Alternate Examinations of Main Steam and Feedwater Nozzle Inside Radius Section	Revised to include a surface examination of at least 10% of the Main Steam and Feedwater nozzle inside radius section.
ISI-012	Pressure Testing of Piping Located in Inaccessible Areas	This new request addresses functional/inservice testing of piping located in areas which have been determined to be inaccessible during operation.