



**ENTERGY**

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Grand Gulf Nuclear Station

January 9, 1992

U.S. Nuclear Regulatory Commission  
Mail Station PL-137  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
ASME Section XI Relief Request Number 1-00023, Revision 0

GNRO-92/00004

Gentlemen:

This submittal requests relief from the requirements of ASME Section XI, in accordance with 10CFR50.55a(g)(5)(iv) and 10CFR50.55a(g)(6)(i). A copy of the relief request is attached.

Relief Request 1-00023, Revision 0 identifies requirements believed to impose undue hardship without providing a commensurate increase in the level of safety or quality.

ASME Section XI, 1977 Edition through the Summer 1979 Addenda, IWA-6230 requires filing the Inservice Inspection summary reports for Class 1 and 2 pressure retaining components and their supports within 90 days of the completion of the Inservice Inspections conducted during the refueling outage. IWA-6220 specifies that examinations, tests, replacements and repairs conducted since the preceding summary reports be included.

Due to the fact that work packages at Grand Gulf are subjected to a series of reviews by several plant organizations, and the number of work packages to be reviewed, we have requested and received extensions for filing the Inservice Inspection Summary report following each of the previous two refueling outages. Based on this experience, as well as our desire to minimize extensive overtime demands on personnel who have just completed a protracted outage period, we request permission to permanently extend the filing time limit for Inservice Inspection summary reports to 180 days.

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Please review and approve the attached request by April 1992 to support filing the Inservice Inspection summary report for the fifth refueling outage. If any additional information is required to support your review, please advise.

Yours truly,

*W F Carter*

WTC/JEO/mtc

attachment: Relief Request 1-00023, Revision 0

cc: Mr. D. C. Hintz (w/a)  
Mr. J. L. Mathis (w/a)  
Mr. R. B. McGehee (w/a)  
Mr. N. S. Reynolds (w/a)  
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GRAND GULF NUCLEAR STATION  
INSERVICE INSPECTION  
TEN YEAR PROGRAM

Inservice Inspection Requirements  
Section 4  
Relief Request

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- I. Component: All ASME Class 1, 2 and 3 components.
- II. Code: Reports for Inservice Inspection of ASME Class 1, 2 and 3 components are in accordance with ASME Section XI, 1977 Edition through the Summer 1979 Addenda.
- III. Code requirements: ASME Section XI, 1977 Edition through the Summer 1979 Addenda, IWA-6230 requires filing the Inservice Inspection summary reports for Class 1 and 2 pressure retaining components and their supports within 90 days of the completion of the inservice inspection conducted during the refueling outage. IWA-6220 specifies that examinations, tests, replacements and repairs conducted since the preceding summary reports be included.
- IV. Information to support the determination that the Code requirements are impractical: IWA-6220 requires that abstracts of repairs and replacements be included in the summary report. GGNS performs reviews on all ASME Section XI work packages (including mechanical, electrical and I&C packages) after refueling outages to identify work packages with Section XI repairs/replacements which require the preparation of NIS-2 forms. The review of work packages and preparation of NIS-2s is required within 90 days. Meeting this requirement is impractical for the following reasons:

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IV. Information to support the determination that the Code requirements are impractical (continued):

1) Work packages for completed work are subjected to a series of reviews by several plant organizations. These reviews verify package correctness and completeness, address failures due to equipment malfunction and verify that the work was properly performed as documented in the package. The amount of time required to complete these post-work reviews can vary from two weeks to three months. Subsequent to these reviews, the package is provided to the Section XI group which is responsible for preparation of the summary report. If another outage is required within the 90 days following a refueling outage, the priority of the organizations performing reviews changes from post-work reviews to outage support.

2) Over 900 Section XI work packages were reviewed by the Section XI group during RF04. Researching the supporting documents (design change packages, material nonconformance reports, material certifications, etc.), preparing the NIS-2s and routing the NIS-2s through the review and approval process is manpower intensive and time consuming.

V. Specific relief requested:

Permission is requested to extend the filing time limit for the Inservice Inspection summary reports for Class 1 and 2 pressure retaining components and their supports to 180 days.

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VI. Reasons why relief should be granted: Extension of the 90 day filing limit is requested for the following reasons:

1) The Code requires inclusion of abstracts of repairs and replacements in the Inservice Inspection Summary Report. For documentation of repairs and replacements, GGNS has elected to utilize the NIS-2 form contained in a later edition of the Code. As stated under "Information to support the determination that the Code requirements are impractical", completion of the work package reviews and preparation of the NIS-2s during the 90 day period is impractical.

2) The work package documents the performance of the repair or replacement. It is assembled and implemented in accordance with plant programs that assure that repairs and replacements are in accordance with the requirements of ASME Section XI. The NIS-2 is utilized to summarize the repair/replacements for reporting purposes and for Code Data Report updates as applicable. The Section XI group performs a comprehensive work package review to ensure that the programs at GGNS are effective. The Section XI group has the best expertise for the review of packages for ASME Section XI compliance. This review provides added assurance that 100% of the Section XI repairs and replacements are properly identified and reported. However, because of the time spent reviewing work packages and preparing NIS-2s, the 90 day filing period causes undue hardship on utility personnel.

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- VI. Reasons why relief should be granted (continued):      Reviewing all Section XI work packages and preparing the NIS-2s within the 90 day filing period requires extensive overtime hours following the outage. Filing the Inservice Inspection summary reports within 90 days of the completion of the inservice inspections is not expected to result in a compensating improvement in quality or safety.
- VII. Alternate Testing:      None
- VIII. NRC discussion statement: