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James J. Fisicaro
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November 22, 1995

U. S. Nuclear Regulatory Commission
Document Control Desk
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Subject: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
Request for Relief from Section XI, Subarticle-3420, "Valve Leak
Rate Test" Requirements

References: 1. RBG-42084, "License Amendment Request (LAR), 95-21, Change to
Technical Specifications 3.6.1.1 through 3.6.1.3, 'Containment Systems,'" dated October 24, 1995.

File Nos.: G9.5, 224.610

RBF1-95-0274

RBG-42179

Gentlemen:

In accordance with 10 CFR 50.55a(a)(3), River Bend Station (RBS) requests relief from the requirements contained within ASME B&PV Code 1980 edition with addenda through Winter 1981. Specifically, RBS asks relief from Section XI, Subarticle-3420, "Valve Leak Rate Test."

As an alternative, RBS requests that valve testing be performed in accordance with ASME/ANSI OMa-1988, Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants," Paragraph 4.2.2, "Valve Seat Leakage Rate Test." This alternative would allow RBS to test Category A Containment Isolation Valves in accordance with Federal Regulation 10 CFR 50 Appendix J. Additionally, in accordance with 10 CFR 50.55a (b)(2)(vii), leakage rates for Category A containment isolation valves that do not provide a reactor coolant system pressure isolation function will be analyzed in accordance with paragraph 4.2.2.3(e) of Part 10, and corrective actions for these valves will be made in accordance with paragraph 4.2.2.3(f) of Part 10 of ASME/ANSI OMa-1988 Addenda to ASME/ANSI OM-1987.

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In Reference 1, RBS requested that changes be made to the Facility Operating License No. NPF-47, Appendix A - Technical Specifications, for RBS in accordance with the rulemaking in regard to 10 CFR 50, Appendix J, Option B. Reference 1 also notified the Office of Nuclear Reactor Regulation (NRR) of EOI's intent to implement a performance-based containment leak rate testing program at RBS in accordance with 10 CFR 50, Appendix J, Option B. Reference 1 contains the justification for changing to a performance-based frequency for leak rate testing of containment isolation valves. By this same justification, RBS is also asking for relief from the testing requirements contained within ASME B&PV Code 1980 edition, Section XI, Subarticle IWV-3420.

This relief is requested to allow EOI to deviate from the frequency requirements contained in the current testing program. Performing testing in accordance with the current frequency requirements will result in additional outage work and could potentially extend the outage duration, thereby causing undue hardship and additional outage-related costs. Relief from the current testing requirements will result in a cost savings of \$240 K for RBS; consequently, this request meets the requirements for a Cost Beneficial Licensing Action (CBLA).

This request for relief has been discussed with the NRR project manager for RBS. If you have any questions regarding this request or require additional information, please contact Mr. R. C. Daley at (504) 381-3771.

Sincerely,



for JJF/RCD/Jr
w/attachments

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ATTACHMENT 1

RELIEF REQUEST

NO. 80

<u>SYSTEM</u>	Various
<u>CODE CLASS</u>	1,2
<u>CATEGORY</u>	A, A/C
<u>COMPONENTS</u>	Category A valves
<u>FUNCTION</u>	Various
<u>TEST REQUIREMENT:</u>	ASME B&PV Code 1980 edition with addenda thru Winter 1981, Section XI, Subsubarticle IWV-3420, "VALVE LEAK RATE TEST"
<u>BASIS FOR RELIEF</u>	By rulemaking effective September 8, 1992 (see Federal Register Vol. 57, 34666), the U.S. Nuclear Regulatory Commission approved, by incorporation by reference, the 1989 edition of the ASME B&PV Code, Section XI. This edition of the ASME Code incorporates by reference ASME/ANSI OMa-1988, Part 10, into Section XI, Article IWV. OM-10 revised the requirements for valve leak rate testing including allowance for testing of CIVs in accordance with 10CFR50, Appendix J.
<u>ALTERNATE TESTING:</u>	<p>Category A valve leakage testing shall be performed in accordance with ASME/ANSI OMa-1988, Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants," Paragraph 4.2.2, "Valve Seat Leakage Rate Test"</p> <p>Additionally, in accordance with 10CFR50.55a (b)(2)(vii), leakage rates for Category A containment isolation valves that do not provide a reactor coolant system pressure isolation function will be analyzed in accordance with paragraph 4.2.2.3(e) of part 10, and corrective actions for these valves will be made in accordance with paragraph 4.2.2.3(f) of part 10 of ASME/ANSI OMa-1988 Addenda to ASME/ANSI OM-1987.</p>