



ENTERGY

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September 5, 1996

M. J. Meisner

Director

Nuclear Safety & Regulatory Affairs

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Subject: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
Addition Information for the Approval and Use of ASME Code
Case N-508-1

GNRO-96/00102

Gentlemen:

On June 20, 1996, Entergy submitted correspondence requesting the approval of alternatives to ASME Codes. Subsequent to the transmittals, we received a verbal request for additional information concerning the proposed alternatives. Although the submittals were similar to previous requests made by Entergy and other utilities, your staff has determine that additional information is necessary to ensure compliance. We were somewhat remiss in failing to show, as a part of our original submittals, that the proposed alternatives would provide an acceptable level of safety and quality in accordance with 10 CFR 50.55a(a)(3)(i). The following is to provide a response to specific questions posed by your staff and information concerning the above part of 10 CFR. For the purpose of your review, Grand Gulf's ASME Section XI Code of Record for repair and replacement is 1977/S79 for the current interval and is anticipated to be the 1992 Edition for the Grand Gulf update.

NRC Requested Additional Information:

1. A detailed description of the snubber and pressure relief valve replacement plans utilizing the Code Case, and the differences from the requirements of the applicable ASME Code Editions and Addenda.

Entergy Response: Currently when a snubber or relief valve is removed for the purposes of testing, two options are available, (1) maintain the system or portion of the system in a degraded condition, while complying with Technical Specifications, until the removed item is tested, and refurbish if required, and then reinstalled, or (2) rotate a "like" item into its place and test the removed item at a later time. For those facilities who are fortunate enough to have ample spares, option (2) is the typical method for minimizing the duration of systems being in a degraded condition. Currently, this activity is required to be treated like an ASME Section XI replacement meeting all the requirements of IWA-7000. This entails the use of Replacement Programs, Replacement Plans, suitability evaluations, unique reviews within the licensees Section XI programs, review and concurrence by the ANII, and maintenance of NIS-2s or other

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Section XI documentation to record the replacement. Such controls are appropriate when items are replaced for the purpose of design changes, failures, or expiration of component life, but as indicated by the industry and the ASME with the issuance of Code Case N-508 these controls are considered excessive for the removal and installation of snubbers and relief valves solely for the purpose of testing. Because of the nine provisions within the Code Case, the alternative only eliminates the administrative controls and documentation requirements associated with an ASME Section XI replacement. All other aspects of the replacement such as design, manufacture, operational limits and settings are still maintained.

2. A clarification of the Licensee's intention to comply with "same design and construction" as indicated in item (a) of the Code Case. Explain how it relates to model, size, manufacture, capacity, design specifications and criteria.

Entergy Response: The use of any Code Case is restricted to its complete use and selecting specific provisions from within a Code Case is not an acceptable practice. Entergy plans to implement item (a) of the Code Case in a manner that ensures that the items being removed and installed are comparable in their design, construction, and operating parameters to the extent that installation can be performed without requiring a plant design change or modification. Additionally, in response to the NRC's concern, it should be noted that paragraph (d) of the Code Case limits the use of items to be installed to those that have been in previous service. This requirement was specifically added to the Code Case to ensure that the initial purchase of an item was in accordance with the Licensee's Section XI Replacement Program and that the item does comply with a component design specification, if required. This ensures that all reconciliations and evaluations have been completed, and that compliance with original Construction Code requirements is maintained before the item is stocked as part of the useable inventory.

3. A clarification of what would be considered repair or replacement of both removed mechanical and hydraulic snubbers, as far as the use of an NIS-2 form is concerned.

Entergy Response: Code Case N-508-1 does not alter any Section XI requirements if the removed snubber requires any repair or replacement of the snubbers Code parts, it only applies to the un-pinning and re-pinning of the original and replacement

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snubber when they are rotated for the purpose of testing. As required by paragraph (i) of the Code Case, repair or replacement of the removed item, when required, shall be performed in accordance with IWA-4000 for repairs and IWA-7000 for replacements. Because of this requirement, if the removed item requires a repair or replacement of Code items contained in the snubber, then this activity will be a typical Section XI repair or replacement and the required Section XI documentation generated (NIS-2 or NIS-2A for Code Case N-532).

4. A discussion of the potential impact on the required plant snubber service life monitoring program due to the use of the Code Case

Entergy Response: As stated in the "Inquiry" and "Reply" of the Code Case, the alternatives are only provided for IWA-4000 (IWA-7000 for Editions and Addenda prior to the 1991 Addenda). All other requirements of ASME Section XI are still required including any testing that may be performed as a result of Section XI. If testing of snubbers and relief valves is performed to other commitments, then that testing is still required as indicated by paragraph (h) of the Code Case which states that testing of removed snubbers and pressure relief valves, including required sample expansions, shall be performed in accordance with the Owner's test program. Use of the Code Case has no effect on any requirements beyond ASME Section XI replacement requirements. The existing commitments for monitoring snubber service life are unaffected.

The use of ASME Code Case N-508-1 as an alternative to IWA-7000 for rotation of snubbers and relief valves for the purpose of testing only provides a reduction in administrative requirements and documentation. All technical requirements (design, fabrication, installation, testing, etc.) are still maintained in a manner that provides an acceptable level of safety that is commensurate with the level of safety afforded by compliance with the ASME Section XI requirements that are currently being implemented.

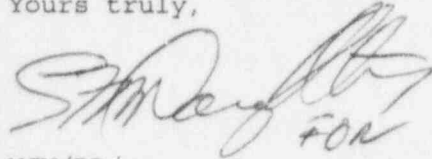
We have determined that Code Case N-508-1 is the only proposed alternative that is needed to support our upcoming Fall refueling outage. In order to expedite the approval process, this letter only addresses alternative N-508-1 for Grand Gulf Nuclear Station. A supplemental transmittal is planned to address the approval of N-508-1 for the other Entergy Nuclear Sites and Code Cases N-509, N-524, and N-546 for all Entergy sites. The approval of this alternative will allow its use in our current and next interval which begins in June 1997.

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Yours truly,

A handwritten signature in dark ink, appearing to read "S. Reynolds". The signature is stylized with a large, sweeping "S" and a cursive "Reynolds". Below the signature, the word "for" is written in a smaller, simpler script.

MJM/RR/rr

cc:

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