



ENTERGY

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Director
Nuclear Safety & Regulatory Affairs

November 1, 1996

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

Attention: Document Control Desk

Subject: Response to Request for Additional Information Concerning
Update of the Inservice Inspection (ISI) Programs for
Arkansas Nuclear One, Grand Gulf Nuclear Station, River
Bend Station and Waterford 3 Steam Electric Station

Arkansas Nuclear One Units 1 & 2 Docket Nos. 50-313 & 50-368 License Nos. DPR-51 & NPF-6	Grand Gulf Nuclear Station Docket No. 50-416 License No. NPF-29
River Bend Station Docket No. 50-458 License No. NPF-47	Waterford 3 Steam Electric Station Docket No. 50-382 License No. NPF-38

GNRO-96/00121

Gentlemen:

Entergy Operations, Inc. is submitting this letter in response to an NRC letter of October 9, 1996 and verbal communication with the NRC on October 22, 1996 concerning our request for alternatives for our inservice inspection (ISI) programs for the next 120-month intervals. The NRC requested additional information on five issues. These issues are addressed in the attachment to this letter.

Additionally, Entergy requested a schedule deferral for Arkansas Nuclear One, Unit 1 (ANO-1) and for Grand Gulf Nuclear Station (GGNS) until June 1, 1997 to allow adequate time to prepare the update of the ISI programs for the next 120-month intervals. The interval for ANO-1 ends December 1, 1996 and the interval for GGNS ends January 1, 1997. Due to the limited time that remains before the intervals expire for ANO-1 and GGNS, Entergy requests that the review of our proposed alternative be completed by November 15, 1996.

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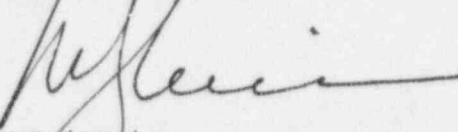
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If you have any questions, please contact Sheri Mahoney at Grand Gulf Nuclear Station at 601-437-6552.

Yours truly,



MJM/SBM/ams
attachment:

Additional Information Concerning the Inservice Inspection Programs for Arkansas Nuclear One, Grand Gulf Nuclear Station, River Bend Station and Waterford 3 Steam Electric Station

cc:

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ADDITIONAL INFORMATION CONCERNING
THE INSERVICE INSPECTION PROGRAMS
FOR ARKANSAS NUCLEAR ONE, GRAND GULF NUCLEAR STATION,
RIVER BEND STATION AND WATERFORD 3 STEAM ELECTRIC STATION

A. Background

In letters dated January 5, 1996 and July 12, 1996, Entergy requested alternatives to Title 10 of the Code of Federal Regulations, Section 50.55a, "Codes and Standards," under the provisions of paragraph (a)(3) for its nuclear units. In a letter dated October 9, 1996, the NRC requested additional information concerning Entergy's requested alternatives. The five issues raised in this letter are addressed below.

B. Additional Information Required

NRC's Condition A

Entergy has proposed not to implement IWE and IWL prior to completion of rulemaking. Rulemaking on this issue is currently being completed and the licensees should follow the requirements of this rulemaking, when referenced in CFR. A commitment to follow the rulemaking requirements when referenced in CFR should be included in the licensee's alternative.

Entergy's response to Condition A

The IWE and IWL final rule was published unexpectedly on August 8, 1996, after our July 12, 1996 letter was submitted; therefore, our letter was merely stating that we did not propose an advance implementation of IWE and IWL prior to completion of rulemaking. Because the IWE and IWL rulemaking has been completed, Entergy intends to take appropriate action consistent with the provisions of IWE and IWL or with the provisions of 10 CFR 50.

NRC's Condition B

The INEL staff believes that the implementation of Appendix VIII will be governed by rulemaking and that at that time the licensee should follow all requirements of the rulemaking. Also, the INEL staff believes that implementing Appendix I of the 1989 Edition of ASME Section XI will provide an acceptable level of quality and safety until rulemaking on Appendix VIII is completed. At that time the licensee should update the programs to reflect the requirements of the rulemaking. A commitment to follow the rulemaking requirements when referenced in CFR should be included in the licensee's alternative.

Entergy's response to Condition B

Entergy is aware of the NRC's plan to require the implementation of Appendix VIII. In the future, when the rulemaking is completed, Entergy intends to take appropriate action consistent with the provisions of the final rule or with the provisions of 10 CFR 50.

NRC's Condition C

Entergy has proposed to implement, at will, any of the Code Cases incorporated into the most recent revision of Regulatory Guide 1.147 (Revision 11, October 1994). These Code Cases have received generic approval for use; however, the licensee must provide written notification to the NRC detailing which Code Cases will be adopted. Code Cases are eventually incorporated into the Code, or annulled, and new cases are included in Regulatory Guide 1.147; therefore, notification must be submitted for each interval to ensure the Code Cases adopted do not conflict with one another or regulatory commitments and to maintain an accurate listing of Code Cases being used by the licensee. A commitment to include a listing of the Regulatory Guide 1.147 incorporated Code Cases that will be implemented, into the updated program plans, should be included in the licensee's alternative.

Entergy's response to Condition C

Regulatory Guide 1.147 lists those Section XI ASME Code Cases that are generally acceptable to the NRC staff for implementation in the inservice inspection of nuclear power plants. In accordance with ASME requirements, the Regulatory Guide 1.147 Code Cases that are used by a licensee are listed in the ISI program. Entergy intends to include these Code Cases in the ISI programs. As stated in our July 12, 1996 letter, a copy of the initial ISI programs will be provided to the NRC after each program becomes effective.

NRC's Condition D

The licensee proposed to continue using Code Cases approved for use by relief request during previous intervals that have not been incorporated into Regulatory Guide 1.147. To use these Code Cases in the program plans, a request for relief must be submitted detailing how the Code Case will be incorporated. Each request for relief is valid for the interval in which it is submitted. This is required because new technologies, improved procedures, and enhanced qualifications may have been developed that could be used. Furthermore, the updates being proposed by the licensee will be directly affected by several Code Cases being used by the various plants. Therefore, the licensee should submit updated requests for relief detailing how the various Code Cases will be implemented into the new program plans. A commitment to submit updated requests for relief detailing how the various Code Cases will be implemented into the new program plans, should be included in the licensee's alternative.

Entergy's response to Condition D

Entergy will submit requests for each Code Case proposed for use in the next interval and not endorsed in Regulatory Guide 1.147. These Code Case requests should be considered separately from and should not interfere with our request for alternative currently under review.

NRC's Condition E

The licensee stated that it has not identified a requirement for the NRC to review and approve the actual programs. However, the NRC is responsible for ensuring quality and safety of U.S. nuclear power plants. This responsibility requires the NRC to review the method of implementing ASME Section XI, the application of Code Cases, and the necessity for requests for relief submitted by the licensees in their respective inservice inspection program plans. Additionally, Section XI, IWA-1400, *Owner's Responsibility*, assigns the licensee the responsibility of "preparation of plans and schedules and filing of these plans and schedules with enforcement and regulatory authorities having jurisdiction at the plant site." Furthermore, IWA-1310, *Components Subject To Inspection and Testing*, states "The selection of components for the inservice inspection plan is subject to review by the regulatory and enforcement authorities having jurisdiction at the plant site." To meet the subject Code requirement and enable the NRC to perform these tasks, the licensee should submit their program plan for review. A commitment to submit their program plans for review should be included in the licensee's alternative.

Entergy's response to Condition E

As stated in our July 12, 1996 letter, a copy of the initial ISI programs will be provided to the NRC after each program becomes effective.

These initial programs may not contain relief requests as Entergy intends to assess new technologies and methods to determine if relief is needed for the new intervals. As needed relief is identified, Entergy will submit those requests.