

Mr. Michael B. Sellman
Vice President Operations
Entergy Operations, Inc.
P. O. Box B
Killona, LA 70066

December 16, 1996

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE RELIEF REQUEST
ASSOCIATED WITH WATERFORD 3 STEAM ELECTRIC STATION FIRST 10-YEAR
INTERVAL INSERVICE INSPECTION PROGRAM PLAN (TAC NO. M95744)

Dear Mr. Sellman:

The Nuclear Regulatory Commission (NRC) staff is reviewing the request for relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI requirements associated with the first 10-year interval inservice inspection program plan for Waterford 3 Steam Electric Station submitted in your June 3, 1996, letter. Additional information is required from Entergy Operations Inc., in order for the staff to complete its review. Request for information is provided in the enclosure.

We request that you provide response within 60 days to meet the staff's inservice inspection program plan review schedule. In addition, to expedite the review process, please send a copy of the response to NRC's contractor, INEL, at the following address:

Michael T. Anderson
INEL Research Center
2151 North Boulevard
PO Box 1625
Idaho Falls, ID 83415-2209

Sincerely,

ORIGINAL SIGNED BY Tim Polich for:
Chandu P. Patel, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure: Request for Additional Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 16, 1996

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Vice President Operations
Entergy Operations, Inc.
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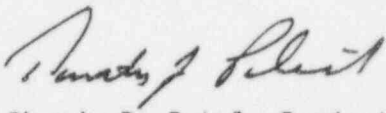
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Mr. Michael B. Sellman
Entergy Operations, Inc.

Waterford 3

cc:

Administrator
Louisiana Radiation Protection Division
Post Office Box 82135
Baton Rouge, LA 70884-2135

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Vice President, Operations
Support
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286

Resident Inspector/Waterford NPS
Post Office Box 822
Killona, LA 70066

Director
Nuclear Safety
Entergy Operations, Inc.
P. O. Box B
Killona, LA 70066

Parish President Council
St. Charles Parish
P. O. Box 302
Hahnville, LA 70057

Wise, Carter, Child & Caraway
P. O. Box 651
Jackson, MS 39205

Executive Vice-President
and Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286-1995

General Manager Plant Operations
Entergy Operations, Inc.
P. O. Box B
Killona, LA 70066

Chairman
Louisiana Public Service Commission
One American Place, Suite 1630
Baton Rouge, LA 70825-1697

Licensing Manager
Entergy Operations, Inc.
P. O. Box B
Killona, LA 70066

Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005-3502

ENTERGY OPERATIONS, INC.,
WATERFORD 3 STEAM ELECTRIC STATION
DOCKET NUMBER 50-382

Request for Additional Information - First 10-Year Interval Inservice
Inspection (ISI) Request

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2 and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components", to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the successive 120-month inspection interval shall comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of a successive 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein and subject to Nuclear Regulatory Commission (NRC) approval.

The staff has reviewed the information provided by the licensee in the June 3, 1996, submittal.

2. Additional Information Required

The staff has concluded that the following information and/or clarification is required in order to complete the review of this request:

- A. State the specific paragraph of the Regulations (10 CFR 50.55a) under which the request is submitted and provide supporting justification as discussed below.

The Regulations provide that a licensee may propose an alternative to CFR or Code requirements in accordance with 10 CFR 50.55a(a)(3)(i) or 10 CFR 50.55a(a)(3)(ii). Pursuant to 10 CFR 50.55a(a)(3)(i), the proposed alternative must be shown to provide an acceptable level of quality and safety, i.e., essentially, be equivalent to the original requirement in terms of quality and safety. Pursuant to 10 CFR 50.55a(a)(3)(ii), the licensee must show that compliance with the original requirement results in a hardship or unusual difficulty without a compensating increase in the level

ENCLOSURE

of quality and safety. Examples of hardship and/or unusual difficulty include, but are not limited to, excessive radiation exposure, disassembly of components solely to provide access for examinations, and development of sophisticated tooling that would result in only minimal increases in examination coverage. A licensee may also submit a request for relief from ASME requirements. In accordance with 10 CFR 50.55a(g)(5)(iii), if a licensee determines that conformance with certain Code requirements is impractical for its facility, the licensee shall notify the Commission and submit, as specified in §50.4, information to support that determination. When a licensee determines that an inservice inspection requirement is impractical, e.g., the system would have to be redesigned, or a component would have to be replaced to enable inspection, the licensee should cite 10 CFR 50.55a(g)(5)(iii). The NRC may, giving due consideration to the burden placed on the licensee, impose an alternative examination requirement.

- B. This request describes the limitations associated with examining the reactor vessel support integral attachment welds. However, the configuration is not adequately described. Provide a detailed sketch of the examination area for this request, including all limitations.
- C. The Code requires surface examination of all four integral attachment welds. The proposed alternative examination is to VT-3 examine only two of the subject welds. Provide a basis for examination of only two welds when the Code requires examination of all four.
- D. Provide the cumulative radiological exposure associated with the VT-3 visual examinations of the two integral welded attachments proposed two and the exposure associated with performing the VT-3 visual examinations on all four reactor vessel integrally welded attachments.