

Jerrold G. Dewease
Vice President Operations Support
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P. O. Box 31995
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October 9, 1996

SUBJECT: UPDATE OF INSERVICE INSPECTION (ISI) PROGRAMS FOR ARKAS NUCLEAR ONE, GRAND GULF NUCLEAR STATION, RIVER BEND STATION, AND WATERFORD STEAM ELECTRIC STATION, UNIT 3, (TAC NOS. M94471, M94472, M94454, M94488, M94473)

Dear Mr. Dewease:

By letter dated January 5, 1996, Entergy Operations, Inc. (EOI), licensee for Arkansas Nuclear One, Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford Steam Electric Station, Unit 3, requested alternatives to Title 10 of the Code of Federal Regulations, Section 50.55a, "Codes and Standards," under the provisions of paragraphs (a)(3)(i) and (a)(3)(ii). Our review with respect to authorizing alternatives as part of EOI's ISI programs for the five nuclear units has progressed to where we need additional information for us to find the programs acceptable. Our contractor, Idaho National Engineering Laboratory (INEL) has prepared the enclosure by our direction. You are requested to respond within 60 days so that we may complete the review on schedule. In responding to this request, please send a copy to: Michael T. Anderson, INEL Research Center, 2151 North Boulevard, P. O. Box 1625, Idaho Falls, Idaho 83415-2209.

If there are any questions on this matter, please contact David L. Wigginton at (301) 415-1301.

Sincerely,

Original signed by
William D. Beckner, Director
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-313, 50-368, 50-416,
50-458, and 50-382

Enclosure: Request for Additional Information

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cc w/encl: See next page

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COPY	YES/NO	YES/NO	YES/NO	YES/NO

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 9, 1996

Jerrold G. Dewease
Vice President Operations Support
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Sincerely,

A handwritten signature in cursive script, reading "William D. Beckner", is written over a horizontal line.

William D. Beckner, Director
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-313, 50-368, 50-416,
50-458, and 50-382

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION - SECOND OR THIRD 10-YEAR INTERVAL

INSERVICE INSPECTION PROGRAM PLAN

ARKANSAS NUCLEAR ONE, UNITS 1 AND 2, DOCKET NOS. 50-313 AND 50-368

GRAND GULF NUCLEAR STATION, DOCKET NO. 50-416

RIVER BEND STATION, DOCKET NO. 50-458

WATERFORD 3 STEAM ELECTRIC STATION, DOCKET NO. 50-382

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 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 successive 120-month inspection intervals 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 licensee, Entergy Operations Inc., submitted a request for authorization to update the inservice inspection (ISI) program at each plant listed below to the 1992 Edition of the ASME Boiler and Pressure Vessel Code, Section XI,

ENCLOSURE

including portions of the 1993 Addenda. During a conference call held on April 8, 1996, the NRC requested additional information concerning the differences between the 1989 Edition of Section XI and those edition/addenda the licensee is requesting to use. This information was supplied to the NRC in a letter dated July 12, 1996. After review of this information, it was determined that further clarification is required to complete the review of the second or third 10-year program plan.

2. Additional Information Required

Based on the above review, the staff has concluded that in order to authorize the licensee's alternative to the Code requirements, incorporation of the following conditions into the applicable request for relief is necessary. Confirm that the conditions stated below will be met.

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.

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.

The following components of your request are found to be unacceptable and written commitments to satisfy the following are necessary in order to find your alternative acceptable:

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.

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.

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.

The schedule for timely completion of this review requires that the licensee provide, by the requested date, the above requested information and/or clarifications regarding the *Arkansas Nuclear One, Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford 3 Steam Electric Station Second or Third 10-Year Interval Inservice Inspection Program Plan*.