



**Entergy Operations, Inc.**  
1340 Echelon Parkway  
Jackson, MS 39213  
Tel 601-368-5102

**Phil Couture**  
Senior Manager, Fleet Regulatory  
Assurance

10 CFR 50.55a

CNRO2021-00014

June 7, 2021

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Request to Use a Provision of a Later Edition of the American Society  
of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code,  
Section XI

Arkansas Nuclear One, Units 1 and 2  
NRC Docket Nos. 50-313 and 50-368  
Renewed Facility Operating License Nos. DPR-51 and NPF-6

Grand Gulf Nuclear Station, Unit 1  
NRC Docket No. 50-416  
Renewed Facility Operating License No. NPF-29

River Bend Station, Unit 1  
NRC Docket No. 50-458  
Renewed Facility Operating License No. NPF-47

Waterford Steam Electric Station, Unit 3  
NRC Docket No. 50-382  
Renewed Facility Operating License No. NPF-38

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in Reference 1, Entergy Operations, Inc. (Entergy) requests U.S. Nuclear Regulatory Commission (NRC) approval to use a specific provision in a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), Grand Gulf Nuclear Station, Unit 1 (GGNS), River Bend Station, Unit 1 (RBS), and Waterford Steam Electric Station, Unit 3 (Waterford). Specifically, Entergy requests approval to use IWA-5120 of the 2017 Edition of the ASME Code, Section XI, for periodic system pressure tests exemptions.

The basis for the proposed alternative is provided in the enclosure to this letter. Entergy requests NRC approval of this multi-site request by July 9, 2022.

A similar request was approved for the Exelon Generation Company, LLC nuclear stations in Reference 2.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact me at (601) 368-5102.

Respectfully,



Phil Couture

PC/jls

Enclosure: Request to Use Provision of a Later Edition of the ASME Code, Section XI

- References:
1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
  2. NRC letter to Exelon Generating Company, LLC, "Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant – Request to Use a Provision of a Later Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (EPID L-2020-LLR-0118)," (ADAMS Accession No. ML21028A673), dated February 3, 2021

cc: NRC Regional Administrator - Region IV  
NRC Senior Resident Inspector (Arkansas Nuclear One, Units 1 and 2)  
NRC Senior Resident Inspector (Grand Gulf Nuclear Station, Unit 1)  
NRC Senior Resident Inspector (River Bend Station, Unit 1)  
NRC Senior Resident Inspector (Waterford Steam Electric Station, Unit 3)  
NRC Project Manager (Entergy Fleet)  
NRC Project Manager (Arkansas Nuclear One, Units 1 and 2)  
NRC Project Manager (Grand Gulf Nuclear Station, Unit 1)  
NRC Project Manager (River Bend Station, Unit 1)  
NRC Project Manager (Waterford Steam Electric Station, Unit 3)

**Enclosure**

**CNRO2021-00014**

**Request to Use Provision of a Later Edition of the ASME Code, Section XI**

## **Request to Use Provision of a Later Edition of the ASME Code, Section XI**

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in Reference 1, Entergy Operations, Inc. (Entergy) requests U.S. Nuclear Regulatory Commission (NRC) approval to use a specific provision in a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2), Grand Gulf Nuclear Station, Unit 1 (GGNS), River Bend Station, Unit 1 (RBS), and Waterford Steam Electric Station, Unit 3 (Waterford). Specifically, Entergy requests approval to use IWA-5120 of the 2017 Edition of the ASME Code, Section XI, for periodic system pressure tests exemptions.

### **I. COMPONENT(S) AFFECTED**

All Class 1, 2, and 3 items located in the ASME Code Section XI boundaries subject to periodic system pressure tests.

### **II. APPLICABLE CODE EDITIONS AND ADDENDA**

<b>Unit</b>	<b>Interval</b>	<b>Start</b>	<b>End</b>
ANO-1	Fifth	May 31, 2017	May 30, 2027
ANO-2	Fifth	March 26, 2020	March 25, 2030
GGNS	Fourth	December 1, 2017	November 30, 2026
RBS	Fourth	December 1, 2017	November 30, 2027
Waterford	Fourth	December 1, 2017	November 30, 2027

The Code of Record for all units' Inservice Inspection (ISI) programs is ASME Section XI, 2007 Edition through 2008 Addenda.

### **III. PROPOSED SUBSEQUENT CODE EDITION AND ADDENDA (OR PORTION)**

In accordance with 10 CFR 50.55a(g)(4)(iv), Entergy requests permission to use IWA-5120 from the 2017 Edition of ASME Section XI in place of the requirements of IWA-5110(c) in the 2007 Edition through 2008 Addenda Edition of the ASME Code, Section XI. This subparagraph states

Piping that penetrates a containment vessel is exempt from the periodic system pressure test when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of this Division.

Subparagraph IWA-5110(c) in the 2007 Edition of ASME Code, Section XI was relocated to the new paragraph IWA-5120 in the 2017 Edition. However, paragraph IWA-5120 also exempts additional systems and components from the periodic pressure test requirement.

#### **IV. RELATED REQUIREMENTS**

10 CFR 50.55a(g)(4)(iv) states:

Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions and addenda may be used, provided that all related requirements of the respective editions or addenda are met.

10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME Code 2017 Edition, as approved in Reference 2. Entergy is requesting to use IWA-5120 of the 2017 Edition of the ASME Code, Section XI to utilize the periodic system pressure test exemptions. There are no related requirements or applicable conditions associated with this subparagraph, IWA-5120.

#### **V. DURATION OF REQUEST**

The duration of this request will continue for the remainder of each unit's current ISI interval.

#### **VI. PRECEDENT**

Reference 3 provides the NRC's approval of a similar request from Exelon Generating Company, LLC.

#### **VII. REFERENCES**

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
2. Federal Register, 85 FR 26540, dated May 4, 2020
- 3.. NRC letter to Exelon Generating Company, LLC, "Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and R. E. Ginna Nuclear Power Plant – Request to Use a Provision of a Later Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (EPID L-2020-LLR-0118)," (ML21028A673), dated February 3, 2021