

From: Lingam, Siva
Sent: Tuesday, June 22, 2021 4:25 PM
To: Couture III, Philip
Cc: Dixon-Herrity, Jennifer; Wengert, Thomas; Buford, Angie; Jenkins, Joel; Benson, Michael; Mitchell, Matthew; Fu, Bart; Buckberg, Perry; Gaston, Ronald William; Hardy, Jeffery A; Schenk, Timothy A; bjohns@entergy.com; Keele Jr, Riley D; pwood1@entergy.com; Meister, Richard
Subject: Entergy Fleet (ANO, Grand Gulf, River Bend, and Waterford) - Acceptance Review for Relief Request to Use a Provision of a Later Edition of the ASME Code, Section XI for periodic system pressure tests exemptions (EPID L-2021-LLR-0042)

By letter dated June 7, 2021 (Agencywide Documents Access and Management System Accession No. ML21158A300), Entergy Operations, Inc. (Entergy) submitted a relief request associated with periodic system pressure tests for Entergy sites of Arkansas Nuclear One, Units 1 and 2 (ANO); Grand Gulf Nuclear Station, Unit 1 (Grand Gulf); River Bend Station, Unit 1 (River Bend); and Waterford Steam Electric Station, Unit 3 (Waterford). This request proposes to use a provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI "Rules for Inservice Inspection of Nuclear Power Plant Components." In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(g)(4)(iv), Entergy requests permission to use IWA-5120 from the 2017 Edition of ASME Code, 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 for periodic system pressure tests exemptions. Please note that 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.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review for the RR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed RR in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 300 hours to complete. The NRC staff expects to complete this review by June 21, 2022, or earlier. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new

estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, or unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1564.

Siva P. Lingam
U.S. Nuclear Regulatory Commission
Project Manager
Palo Verde Nuclear Generating Station, Units 1, 2, and 3
Grand Gulf Nuclear Station
Entergy Fleet
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