



ENTERGY OPERATIONS, INC. PRE-SUBMITTAL MEETING

Proposed Alternative to Use ASME Code Case N-752,
Risk-Informed Categorization and Treatment for Repair/
Replacement Activities in Class 2 and 3 Systems,
Section XI, Division 1

June 14, 2022



Purpose of Meeting

- Describe a planned relief request for a proposed alternative to use ASME Code Case N-752, Risk-Informed Categorization and Treatment for Repair/ Replacement Activities in Class 2 and 3 Systems, Section XI, Division 1, at Grand Gulf Nuclear Station, Unit 1 (GGNS), River Bend Station, Unit 1, (RBS) and Waterford Steam Electric Station, Unit 3 (WF3).
 - Background
 - Proposed Alternative
 - Relief Request Basis
 - Precedent
 - Schedule
- Obtain feedback from NRC Staff on proposed relief request.

Background

Code Case N-752 provides for risk-informed categorization and treatment requirements for performing repair/replacement activities on delineated Class 2 and 3 pressure retaining items or their associated supports. Code Case N-752 may be applied on a system basis or on individual items in selected systems.

Code Case N-752 is based on Arkansas Nuclear One (ANO), Unit 2 (ANO-2), relief request ANO2-R&R-004, Revision 1, dated April 17, 2007 (ML071150108). The NRC approved relief request ANO2-R&R-004, Revision 1, in a safety evaluation dated April 22, 2009 (ML090930246). This ANO-2 relief request was developed to serve as an industry pilot for implementing a risk-informed repair/replacement process that included a risk-informed categorization process and treatment requirements.

The NRC subsequently approved ANO relief request EN-RR-20-001, Revision 1, in a safety evaluation dated May 19, 2021 (ML21118B039). EN-RR-20-001, Revision 1, implements Code Case N-752 for ANO Units 1 & 2.

Proposed Alternative

Pursuant to 10 CFR 50.55a(z)(1), Entergy proposes to implement ASME Code Case N-752, as an alternative to the ASME Code requirements, for GGNS, RBS, and WF3.

ASME Code Case N-752 includes provisions for exempting Class 2 or Class 3 items categorized as Low Safety Significance (LSS) from the repair/replacement requirements (e.g., IWA-4000) of the ASME Section XI Code. In addition, it exempts compliance to IWA-1400(n) [in 2007 Edition/2008 Addenda] which invokes the requirement for a QA Program in accordance with either 10 CFR 50, Appendix B, or ASME NQA-1.

The related Entergy QAPM revision was approved by the NRC in the Safety Evaluation dated May 19, 2021 (ML21132A279).

Relief Request Basis

Use of the proposed alternative is based upon 10 CFR 50.55a(z)(1) which states: Implementation of a proposed alternative that would provide an acceptable level of quality and safety.

Code Case N-752 specifies requirements for performing risk-informed categorization and treatment for performing repair/replacement activities on Class 2 and 3 pressure retaining items or associated supports. The Code Case N-752 categorization process provides a comprehensive methodology for determining the safety significance of items – HSS or LSS. This categorization process is technically identical to that approved by the NRC under relief request ANO2-R&R-004, Revision 1.

Repair/replacement activities performed on items determined to be HSS must continue to comply with the ASME Section XI Code. Repair/replacement activities performed on LSS items may comply with alternative treatment requirements that are defined by the Owner but must comply with all provisions of paragraph -1420 of Code Case N-752.

Precedent

- Entergy Relief Request EN-RR-20-001, Revision 1, dated May 19, 2021 (ML21118B039).
- Entergy Relief Request ANO2-R&R-004, Revision 1, dated April 22, 2009 (ML090930246).

Schedule

Entergy plans to submit the relief request by June 30, 2022

Authorization will be requested by July 1, 2023, to support planning of future repair/replacement activities associated with Grand Gulf Nuclear Station, Unit 1, River Bend Station, Unit 1, and Waterford 3 Steam Electric Station.

Questions?

