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October 7, 2025

Exemption Request to Align ISI Intervals' End Dates

Pre-submittal Presentation

Agenda

- **Purpose**
- **Background**
- **Request**
- **Next Steps**

Purpose

Pursuant to 10 CFR 50.12, "Specific exemptions," Entergy Operations, Inc. (Entergy), plans to request an exemption to the requirements of 10 CFR 50.55a(g)(4)(ii) to update the American Society of Mechanical Engineers (ASME) Code of Record for the Section XI activity programs for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and 2), Grand Gulf Nuclear Station (GGNS), River Bend Station (RBS) and Waterford Steam Electric Station, Unit 3 (WF3).

These programs include Inservice Inspection (ISI), Repair/Replacement (RR), Pressure Test (PT), Containment ISI (CISI) and Non-Destructive Examinations (NDE).

Entergy desires to have all its operating units ASME Section XI programs on the same code of record for AMSE Section XI activities by having the current intervals end on a common date..

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Background

Plant	Current ISI Interval	Code of Record	Start Date	Current End Date
ANO-1	5th	2007 edition with the 2008 addenda	May 31, 2017	May 20, 2027
ANO-2	5th	2007 edition with the 2008 addenda	March 26, 2020	March 25, 2030
GGNS	4th	2007 edition with the 2008 addenda	December 1, 2017	November 30, 2027
RBS	4th	2007 edition with the 2008 addenda	December 1, 2017	November 30, 2027
WF3	4th	2007 edition with the 2008 addenda	December 1, 2017	November 30, 2027

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Background

As can be seen on the previous slide, currently the Entergy fleet is using the same Code of Record (2007 edition with the 2008 addenda) for all operating plants.

On May 31, 2017, ANO-1, and on November 30, 2017, GGNS, RBS, and WF3, updated the respective ISI programs to the 2007 Edition through the 2008 Addenda of Section XI in accordance with the requirements of 10 CFR 50.55a(g)(4)(ii). Under EN-ISI-16-1 (ML17174B144), ANO-2 was approved to use ASME Section XI, 2007 Edition through the 2008 Addenda for the performance of ISI, R/R, PT, CISI, and NDE activities commencing on December 1, 2017, through the end of the fourth ISI interval in order to allow continued use of common Entergy procedures, processes, training, knowledge, and technical skills.

ANO2-ISI-021 (ML19156A400) permitted ANO-2 to continue the use 2007 edition with the 2008 addenda for the remainder of the fifth 10-year inspection interval; thereby allowing Entergy the ability to continue to continued use of common Entergy procedures, processes, training, knowledge, and technical skills.

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Request

To eliminate the burden of preparing and reviewing similar requests in the future, Entergy is requesting an exemption to end the current ISI interval on a common date.

Entergy proposes to extend the current interval for ANO-1, GGNS, RBS and WF3 until November 30, 2029, approximately 24 months. The ANO-2 interval would be reduced by approximately 4 months.

Approval of this request supports Entergy's ability to maximize efficiencies and optimizes the use of internal operating experience because five units will be utilizing common procedures, processes, training, and knowledge.

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Request

Plant	Current End Date	Proposed End Date
ANO-1	May 20, 2027	November 30, 2029
ANO-2	March 25, 2030	November 30, 2029
GGNS	November 30, 2027	November 30, 2029
RBS	November 30, 2027	November 30, 2029
WF3	November 30, 2027	November 30, 2029

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Request

Although this request is not to utilize ASME Code Case N-921, there are points worth mentioning that will be addressed in this request.

Entergy did note that the NRC Final Rule noticed in the Federal Register reiterated the rationale underlying N-921 Condition 2:

- There are complications associated with extending the ISI interval mid-interval. For instance, licensees wanting to extend the ISI interval mid-interval would need to evaluate all NRC-approved alternatives to determine if they should be resubmitted, especially considering that NRC may have granted the alternative assuming a 10-year ISI interval.

Entergy has reviewed all relief requests either currently approved or under review and determined that the interval extension requested does not impact previously approved relief requests. See the following page as an example of this review.

Request

Relief Request	Description	Submitted Date / ADAMS Accession Number	Approval Date / ADAMS Accession Number	Duration of Approval	Impacts of Interval Extension
ANO1-ISI-037	Request for Alternative for Implementation of Extended Reactor Vessel ISI Interval	June 8, 2023 / ML23159A269	April 10, 2024 / ML24089A541	For the fifth and sixth 10-Year ISI Interval (May 20, 2034)	There are no impacts as the commitment is to perform the required inspections prior to end of the current renewed operating license (May 20, 2034).
EN-20-RR-003 (applicable to all five units of the Entergy fleet)	Proposed Alternative to Apply the Examination Volumes Described in ASME Code Case N-711-2	December 30, 2020 / ML20365A088	October 28, 2021 ./ ML21299A003	Until May 30, 2027.	There are no impacts as the use ASME Code Case N-711-2 has been incorporated into Table 2 of Regulatory Guide (RG) 1.147, Revision 21.
No relief request number (applicable to all five units of the Entergy fleet)	Use of Sub-article IWA-5120 of the 2017 Edition of the ASME Code, Section XI.	June 7, 2021 / ML21158A300	January 18, 2022 / ML22007A317	Remainder of the current interval.	There are no impacts. Entergy has notified the NRC that we will use the provisions of the 2017 code for IWA-5120 until such time that we update to the latest approved code in 10 CFR 50.55a. (CNRO-2021-00014, ML21158A300)
ANO1-ISI-24-01	Defer the Inservice inspection (ISI) of the steam generator welds and nozzle inner radii to the end of the operating licenses	June 6, 2024 / ML24158A389	April 29, 2025 / ML25105A064	Up to May 20, 2034	There are no impacts as this relief was approved for the remainder of the current renewed operating license.

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Request

It should be noted that a few of the requests are currently under NRC review. These reliefs, if approved as requested, will not have any impacts as the reliefs are for the remainder of the operating license.

Some of the requests were approved for the current interval. The dates provided in these letters were estimated at the time the relief was submitted. Entergy has determined these requests are not required to be resubmitted as part of extending the interval for the applicable stations.

Entergy has determined that one request needs to be resubmitted. The GGNS request for alternative examination of Reactor Pressure Vessel (RPV) circumferential shell welds needs to be resubmitted for the Period of Extended Operation; however, this does not impact this exemption request.

Request

During the proposed extension, continue to use the 2007 Edition through the 2008 Addenda of ASME Section XI as the Code of Record.

All exams required during the current interval will be completed prior to the current end date.

The requested extension will not alter the pattern of inspections at each site.

The same pattern of inspections will be upheld in the time extension (essentially the pattern of the first period exams will be performed during extended time requested in this letter).

Will not extend any exam frequencies during the extend time.

At the end of the extended time, the ASME Section XI programs will be updated in accordance with 10 CFR 50.55a to maintain the same Code of Record for the Entergy plants.

Conclusion

Approving this exemption request will allow Entergy to maximize efficiencies and optimizes the use of internal operating experience by continuing to use common procedures, processes, training, knowledge, and technical skills for the ASME Section XI ISI programs.

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Next Steps

- Submittal in 4th Quarter 2025
- Request standard NRC review and approval time

Questions?


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