

From: Guzman, Richard
Sent: Wednesday, January 13, 2016 9:29 AM
To: 'HARRIS, EDWARD D (HQN)'
Cc: DAVANT, GUY H
Subject: Entergy CNRO-2015-00023 - Revision to Entergy Quality Assurance Program Manual (Fleet Submittal CAC Nos. MF7086-MF7087) - REQUEST FOR ADDITIONAL INFORMATION

Ed,

The NRC staff has reviewed the information provided in the subject letter dated November 6, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15310A388), and has determined that additional information is needed to complete its review. Shown below is the NRC staff's request for additional information (RAI) questions. The information was discussed with your staff on January 13, 2016. As agreed, please provide your formal response by February 29, 2016. Please contact me if you have any questions.

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OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR ADDITIONAL INFORMATION (RAI)

REQUEST FOR APPROVAL OF CHANGE TO THE ENTERGY QUALITY ASSURANCE  
PROGRAM MANUAL (QAPM) REVISION 29

CNRO-2015-00023

ENTERGY NUCLEAR OPERATIONS, INC.

ENTERGY NUCLEAR, INC.

CAC NOS. MF7086-MF7087

DOCKET NOS. 50-003; 50-155; 50-247; 50-255; 50-286; 50-293; 50-313; 50-333; 50-368;  
50-382; 50-416; 50-458; 72-007; 72-012;72-013; 72-043; 72-049; 72-050; 72-051; 72-075; 72-  
1004

RAI-1

Title 10, Part 50, of the Code of Federal Regulations (10 CFR Part 50), "Domestic Licensing of Production and Utilization Facilities," Part 50.54 "Conditions of licenses," "(jj) Structures, systems, and components subject to the codes and standards in 10 CFR 50.55a must be

designed, fabricated, erected, constructed, tested, and inspected to quality standards commensurate with the importance of the safety function to be performed.” Part 50.55(a), “Codes and standards” states that a licensee meet the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, as applicable.

ASME Boiler and Pressure Vessel Code Case N-384-1, “Use of Prepackage General Purpose Cement Grouts, Epoxy Grouts, and Epoxy Bonding Materials,” Section III, Division 2, Class CC, states in part that, “for Section III, Division 2, construction, it is permissible to use prepackaged general purpose cement grouts, in lieu of site mixed (proportioned) materials, provided that products used as grout are tested for strength in accordance with the strength requirements for grout in Table CC-5200-1.”

Per Entergy Change Notice 2015-00023, “the proposed deletion reduces the commitment established in the consolidated Quality Assurance Program Manual (QAPM) as approved by the NRC via Safety Evaluation Report dated November 6, 1998, which included section K.3 in Table 1. Elimination of the requirement to perform compressive strength testing for prepackaged nonshrink grout is based on an ASME inquiry for testing requirements of prepackaged non-shrink grout. The ASME responded via QA92-003, that testing of prepackage non-shrink grout did not fall under the jurisdiction of Table B of ANSI N45.2.5, ‘Supplementary Quality Assurance requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel during the Construction Phase of Nuclear Power Plants,’ dated 1974.”

Provide clarification as to whether Code Case N-384-1 was considered and how Entergy incorporates the requirements of ASME Section III, Division 2, in its QAPM.

## RAI-2

In 10 CFR 50.34(h)(3), “Conformance with the standard review plan (SRP),” it states that “the SRP was issued to establish criteria that the NRC staff intends to use in evaluating whether an applicant/licensee meets the Commission’s regulations.”

NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition,” Chapter 3, “Design of Structures, Components, Equipment, and Systems,” and Chapter 17, “Quality Assurance,” subsections references several Regulatory Guides (RGs) as well as codes and standards such as the following- but not limited to:

- RG 1.55, “Concrete Placement in Category I Structures”
- RG 1.94, “Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants”
- RG 1.107, “Qualifications for Cement Grouting for Prestressing Tendons in Containment Structures”
- RG 1.136 “Design Limits, Loading Combinations, Materials, Construction, and Testing of Concrete Containments”
- ASME Section III, “Rules for Construction of Nuclear Power Plant Components,” Division 2, “Code for Concrete Reactor Vessels and Containments”

Per Entergy Change Notice 2015-00023, it is stated that “the proposed change to the QAPM, as revised and noted, continues to satisfy the requirements of 10 CFR 50 Appendix B and the RGs and ANSI Standards referenced in the QAPM Table of Contents and QAPM Attachment, Table 1.”

The NRC staff was unable to ascertain whether the aforementioned ASME code and RGs were considered prior to the change notice submittal. Provide clarification on how Entergy incorporates these RGs and applicable codes and standards in the QAPM.