September 29, 2005

Mr. Michael R. Kansler
President
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING REQUEST FOR RELIEF FROM SYSTEM HYDROSTATIC TEST REQUIREMENTS FOR LARGE BORE PIPE (TAC NO. MC7307)

Dear Mr. Kansler:

On June 8, 2005, Entergy Nuclear Operations, Inc. (Entergy), submitted a request for relief from system hydrostatic test requirements for large bore, American Society of Mechanical Engineers Code Class 1, Reactor Coolant Pressure Boundary, process, drain, test, and flush lines and connections.

The Nuclear Regulatory Commission staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). During a telephone call on September 14, 2005, the Entergy staff indicated that a response to the RAI would be provided within 30 days of the receipt of this letter.

Please contact me at (301) 415-2901 if you have any questions on this issue.

Sincerely,

/RA/

John P. Boska, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosure: RAI

cc w/encl: See next page

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DATE	9/19/05	9/27/05	9/28/05

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Indian Point Nuclear Generating Unit No. 2

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Indian Point Nuclear Generating Unit Nos. 2 & 3

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REQUEST FOR ADDITIONAL INFORMATION

REGARDING RELIEF FROM SYSTEM HYDROSTATIC TEST REQUIREMENTS

FOR LARGE BORE PIPE

ENTERGY NUCLEAR OPERATIONS, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

In a letter dated June 8, 2005, Entergy Nuclear Operations, Inc. (Entergy), submitted a request for relief from system hydrostatic test requirements for large bore, American Society of Mechanical Engineers (ASME) Code Class 1, Reactor Coolant Pressure Boundary, process, drain, test, and flush lines and connections for Indian Point Nuclear Generating Unit No. 2 (IP2). The Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has the following questions:

1. Please confirm the start and end dates for the third 10-year inservice inspection (ISI) interval at IP2.

2. Requirements for pressure testing found in both the ASME Code and ASME Code Case N-498-4 were cited in Relief Request (RR) RR-74. ASME Code Case N-498-4 is an alternative to certain ASME Code requirements for hydrostatic pressure testing of ASME Class 1, 2, and 3 components, and is approved in Revision 13 of Regulatory Guide (RG) 1.147, “Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1,” for general use, provided the licensee meets the stated condition that hold times during these pressure tests are maintained according to the 1989 Edition of ASME Code, Section XI.

   The licensee’s proposal contains references to both ASME Code and ASME Code Case N-498-4 requirements, therefore, it appears the licensee has adopted the alternatives described in the ASME Code Case N-498-4 (with the condition imposed), in conjunction with associated ASME Code requirements that are required for pressure testing of the subject components.

   Please note that ASME Code Case N-498-4 is a voluntary alternative to ASME Code requirements and the staff expects that ASME Code Cases approved in RG 1. 147 will be adopted in their entirety. Further, Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(a)(3), allows licensees to propose alternatives to ASME Code requirements, provided (i) an acceptable level of quality and safety will be realized by the alternative, or (ii) existing ASME Code or CFR requirements would impose an unusual hardship or difficulty without a compensating increase in quality and safety. However, no mechanism for evaluating a licensee’s proposal to an existing, NRC-approved, voluntary alternative, is allowed by the provisions at 10 CFR 50.55a(a)(3). This would, in effect, be providing an alternative to an alternative.

Enclosure

The issue related to test pressures and temperatures for the piping segments defined in RR-74 should be addressed as a stand alone alternative to ASME Code requirements, not as an alternative to ASME Code Case N-498-4. Please revise the proposal accordingly, re-state the basis for the alternative, describe the hardship or unusual difficulty that would be incurred if the ASME Code or CFR requirements are imposed, and clearly define all conditions or provisions that will be met by the proposed alternative.

3. For each of the piping segments listed in the table in the proposed alternative, please provide the piping material, piping design pressure and proposed test pressure. In addition, submit the isometric drawings associated with the piping segments.

4. For the piping segments discussed in RR-74, list any other examinations that are conducted to ensure structural or leakage integrity. Specifically, describe any volumetric or surface examinations being performed as part of the current ISI program, and list any indications that have resulted from these examinations.

5. State the operating pressures and temperatures of these piping segments during a plant event that requires safety injection, (i.e., operation of the lines). Include a discussion regarding why the proposed pressure and temperature is adequate to ensure leakage integrity for these lines.

6. In Section 6 of RR-74, “Basis for Relief Request,” it is stated that there would be additional radiation exposure to plant personnel if the ASME Code system leakage test was performed to the full system boundary, but an estimated radiation dose to plant personnel was not provided. For each item in attachment 1 of your submittal, please provide the estimated dose savings which would result if this relief was approved.