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Fred Dacimo
Vice President
License Renewal

NL-09-111

August 6, 2009

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Additional Information Regarding License Renewal Application –
IPEC RAI 2.3A.3.11-1 and Buried Piping and Tanks Inspection
Clarifications
Indian Point Nuclear Generating Unit Nos. 2 & 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

REFERENCE:

1. Entergy Letter dated November 16, 2007, F. R. Dacimo to Document Control Desk, "Reply to Request for Additional Information Regarding License Renewal Application" (NL-07-138)
2. Entergy Letter dated July 27, 2009, F. R. Dacimo to Document Control Desk, "Questions Regarding Buried Piping Inspections" (NL-09-106)
3. Telephone Conference Call Held on August 4, 2009, Between the U.S. Nuclear Regulatory Commission and Entergy Nuclear Operations, Inc., Pertaining to the Indian Point Nuclear Generating Unit Nos. 2 and 3, License Renewal Application – IPEC RAI 2.3A.3.11-1 Clarification
4. Telephone Conference Call Held on August 5, 2009, Between the U.S. Nuclear Regulatory Commission and Entergy Nuclear Operations, Inc., Pertaining to the Indian Point Nuclear Generating Unit Nos. 2 and 3, License Renewal Application – Buried Piping and Tanks Inspection

Dear Sir or Madam:

On August 4 and August 5, 2009 Teleconferences were held between the U.S. Nuclear Regulatory Commission and Entergy Nuclear Operations, Inc. concerning our response to RAI 2.3A.3.11-1 in Reference 1 and Buried Piping and Tanks Inspection information in Reference 2. In response to staff questions, Entergy Nuclear Operations, Inc is providing, in Attachment 1, a IPEC RAI 2.3A.3.11-1 and Buried Piping and Tanks Inspection clarifications pertaining to the License Renewal Application for Indian Point 2 and Indian Point 3.

A128
NRR

If you have any questions, or require additional information, please contact Mr. Robert Walpole at 914-734-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
8/6/09.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dan", with a stylized flourish at the end.

FRD/dmt

- Attachment: 1. Additional Information Regarding License Renewal Application –
IPEC RAI 2.3A.3.11-1 and Buried Piping and Tanks Inspection
Clarifications
2. IPEC Commitment List, Revision 11

cc: Mr. Samuel J. Collins, Regional Administrator, NRC Region I
Mr. Sherwin E. Turk, NRC Office of General Counsel, Special Counsel
Ms. Kimberly Green, NRC Safety Project Manager
Mr. John Boska, NRR Senior Project Manager
Mr. Paul Eddy, New York State Department of Public Service
NRC Resident Inspector's Office
Mr. Francis J. Murray, President and CEO, NYSERDA

ATTACHMENT 1 TO NL-09-111

**Additional Information Regarding License Renewal Application –
IPEC RAI 2.3A.3.11-1 and Buried Piping and Tanks Inspection Clarifications**

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 & 3
DOCKET NOS. 50-247 AND 50-286**

**INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
LICENSE RENEWAL APPLICATION
IPEC RAI 2.3A.3.11-1 AND BURIED PIPING AND TANKS INSPECTION
CLARIFICATIONS**

RAI 2.3A.3.11-1 Clarification

The IP1 fire protection components that are referenced in the RAI 2.3A.3.11-1 response are specifically used only to support IP1 and do not have an intended function for IP2 or IP3. They are not required to demonstrate IP2 or IP3 compliance with 10 CFR 50.48 and therefore, are not in the scope of license renewal.

The IP1 components are credited in the IP1 fire protection program which meets the requirements of 10 CFR 50.48(f).

Buried Piping and Tanks Inspection Program – Clarification

Program Improvements Resulting from Operating Experience

Entergy will employ inspection methods with demonstrated effectiveness for detection of aging effects during the period of extended operation. The Electric Power Research Institute is evaluating a number of techniques for application to the commercial nuclear power industry, e.g., guided wave ultrasonic technology. Entergy will employ an inspection method that has been demonstrated effective by EPRI to address issues with degradation of buried components.

Commitment

Include in the Buried Piping and Tanks Inspection Program described in LRA Section B.1.6 a risk assessment of in-scope buried piping and tanks that includes consideration of the impacts of buried piping or tank leakage and of conditions affecting the risk for corrosion. Classify pipe segments and tanks as having a high, medium or low impact of leakage based on the safety class, the hazard posed by fluid contained in the piping and the impact of leakage on reliable plant operation. Determine corrosion risk through consideration of piping or tank material, soil resistivity, drainage, the presence of cathodic protection and the type of coating. Establish inspection priority and frequency for periodic inspections of the in-scope piping and tanks based on the results of the risk assessment. Perform inspections using inspection techniques with demonstrated effectiveness.

ATTACHMENT 2 TO NL-09-111

IPEC Commitment Letter, Revision 11

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 & 3
DOCKET NOS. 50-247 AND 50-286

List of Regulatory Commitments

Revision 11

The following table identifies those actions committed to by Entergy in this document.

Changes are shown as strikethroughs for ~~deletions~~ and underlines for additions.

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
1	Enhance the Aboveground Steel Tanks Program for IP2 and IP3 to perform thickness measurements of the bottom surfaces of the condensate storage tanks, city water tank, and fire water tanks once during the first ten years of the period of extended operation. Enhance the Aboveground Steel Tanks Program for IP2 and IP3 to require trending of thickness measurements when material loss is detected.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039	A.2.1.1 A.3.1.1 B.1.1
2	Enhance the Bolting Integrity Program for IP2 and IP3 to clarify that actual yield strength is used in selecting materials for low susceptibility to SCC and clarify the prohibition on use of lubricants containing MoS ₂ for bolting. The Bolting Integrity Program manages loss of preload and loss of material for all external bolting.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039 NL-07-153	A.2.1.2 A.3.1.2 B.1.2 Audit Items 201, 241, 270

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
3	<p>Implement the Buried Piping and Tanks Inspection Program for IP2 and IP3 as described in LRA Section B.1.6.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801 Section XI.M34, Buried Piping and Tanks Inspection.</p> <p>Include in the Buried Piping and Tanks Inspection Program described in LRA Section B.1.6 a risk assessment of in-scope buried piping and tanks that includes consideration of the impacts of buried piping or tank leakage and of conditions affecting the risk for corrosion. Classify pipe segments and tanks as having a high, medium or low impact of leakage based on the safety class, the hazard posed by fluid contained in the piping and the impact of leakage on reliable plant operation. Determine corrosion risk through consideration of piping or tank material, soil resistivity, drainage, the presence of cathodic protection and the type of coating. Establish inspection priority and frequency for periodic inspections of the in-scope piping and tanks based on the results of the risk assessment. Perform inspections using qualified inspection techniques with demonstrated effectiveness.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p> <p>NL-09-106</p> <p><u>NL-09-111</u></p>	<p>A.2.1.5 A.3.1.5 B.1.6 Audit Item 173</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
4	<p>Enhance the Diesel Fuel Monitoring Program to include cleaning and inspection of the IP2 GT-1 gas turbine fuel oil storage tanks, IP2 and IP3 EDG fuel oil day tanks, IP2 SBO/Appendix R diesel generator fuel oil day tank, and IP3 Appendix R fuel oil storage tank and day tank once every ten years.</p> <p>Enhance the Diesel Fuel Monitoring Program to include quarterly sampling and analysis of the IP2 SBO/Appendix R diesel generator fuel oil day tank, IP2 security diesel fuel oil storage tank, IP2 security diesel fuel oil day tank, and IP3 Appendix R fuel oil storage tank. Particulates, water and sediment checks will be performed on the samples. Filterable solids acceptance criterion will be less than or equal to 10mg/l. Water and sediment acceptance criterion will be less than or equal to 0.05%.</p> <p>Enhance the Diesel Fuel Monitoring Program to include thickness measurement of the bottom of the following tanks once every ten years. IP2: EDG fuel oil storage tanks, EDG fuel oil day tanks; SBO/Appendix R diesel generator fuel oil day tank, GT-1 gas turbine fuel oil storage tanks, and diesel fire pump fuel oil storage tank; IP3: EDG fuel oil day tanks, EDG fuel oil storage tanks, Appendix R fuel oil storage tank, and diesel fire pump fuel oil storage tank.</p> <p>Enhance the Diesel Fuel Monitoring Program to change the analysis for water and particulates to a quarterly frequency for the following tanks. IP2: GT-1 gas turbine fuel oil storage tanks and diesel fire pump fuel oil storage tank; IP3: Appendix R fuel oil day tank and diesel fire pump fuel oil storage tank.</p> <p>Enhance the Diesel Fuel Monitoring Program to specify acceptance criteria for thickness measurements of the fuel oil storage tanks within the scope of the program.</p> <p>Enhance the Diesel Fuel Monitoring Program to direct samples be taken and include direction to remove water when detected.</p> <p>Revise applicable procedures to direct sampling of the onsite portable fuel oil contents prior to transferring the contents to the storage tanks.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p> <p>NL-08-057</p>	<p>A.2.1.8 A.3.1.8 B.1.9 Audit items 128, 129, 132, 491, 492, 510</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
4 Cont	Enhance the Diesel Fuel Monitoring Program to direct the addition of chemicals including biocide when the presence of biological activity is confirmed.			
5	Enhance the External Surfaces Monitoring Program for IP2 and IP3 to include periodic inspections of systems in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4(a)(1) and (a)(3). Inspections shall include areas surrounding the subject systems to identify hazards to those systems. Inspections of nearby systems that could impact the subject systems will include SSCs that are in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4(a)(2).	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039	A.2.1.10 A.3.1.10 B.1.11
6	Enhance the Fatigue Monitoring Program for IP2 to monitor steady state cycles and feedwater cycles or perform an evaluation to determine monitoring is not required. Review the number of allowed events and resolve discrepancies between reference documents and monitoring procedures. Enhance the Fatigue Monitoring Program for IP3 to include all the transients identified. Assure all fatigue analysis transients are included with the lowest limiting numbers. Update the number of design transients accumulated to date.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039 NL-07-153	A.2.1.11 A.3.1.11 B.1.12, Audit Item 164

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
7	<p>Enhance the Fire Protection Program to inspect external surfaces of the IP3 RCP oil collection systems for loss of material each refueling cycle.</p> <p>Enhance the Fire Protection Program to explicitly state that the IP2 and IP3 diesel fire pump engine sub-systems (including the fuel supply line) shall be observed while the pump is running. Acceptance criteria will be revised to verify that the diesel engine does not exhibit signs of degradation while running; such as fuel oil, lube oil, coolant, or exhaust gas leakage.</p> <p>Enhance the Fire Protection Program to specify that the IP2 and IP3 diesel fire pump engine carbon steel exhaust components are inspected for evidence of corrosion and cracking at least once each operating cycle.</p> <p>Enhance the Fire Protection Program for IP3 to visually inspect the cable spreading room, 480V switchgear room, and EDG room CO₂ fire suppression system for signs of degradation, such as corrosion and mechanical damage at least once every six months.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	NL-07-039	<p>A.2.1.12</p> <p>A.3.1.12</p> <p>B.1.13</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
8	<p>Enhance the Fire Water Program to include inspection of IP2 and IP3 hose reels for evidence of corrosion. Acceptance criteria will be revised to verify no unacceptable signs of degradation.</p> <p>Enhance the Fire Water Program to replace all or test a sample of IP2 and IP3 sprinkler heads required for 10 CFR 50.48 using guidance of NFPA 25 (2002 edition), Section 5.3.1.1.1 before the end of the 50-year sprinkler head service life and at 10-year intervals thereafter during the extended period of operation to ensure that signs of degradation, such as corrosion, are detected in a timely manner.</p> <p>Enhance the Fire Water Program to perform wall thickness evaluations of IP2 and IP3 fire protection piping on system components using non-intrusive techniques (e.g., volumetric testing) to identify evidence of loss of material due to corrosion. These inspections will be performed before the end of the current operating term and at intervals thereafter during the period of extended operation. Results of the initial evaluations will be used to determine the appropriate inspection interval to ensure aging effects are identified prior to loss of intended function.</p> <p>Enhance the Fire Water Program to inspect the internal surface of foam based fire suppression tanks. Acceptance criteria will be enhanced to verify no significant corrosion.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p> <p>NL-08-014</p>	<p>A.2.1.13 A.3.1.13 B.1.14 Audit Items 105, 106</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
9	<p>Enhance the Flux Thimble Tube Inspection Program for IP2 and IP3 to implement comparisons to wear rates identified in WCAP-12866. Include provisions to compare data to the previous performances and perform evaluations regarding change to test frequency and scope.</p> <p>Enhance the Flux Thimble Tube Inspection Program for IP2 and IP3 to specify the acceptance criteria as outlined in WCAP-12866 or other plant-specific values based on evaluation of previous test results.</p> <p>Enhance the Flux Thimble Tube Inspection Program for IP2 and IP3 to direct evaluation and performance of corrective actions based on tubes that exceed or are projected to exceed the acceptance criteria. Also stipulate that flux thimble tubes that cannot be inspected over the tube length and cannot be shown by analysis to be satisfactory for continued service, must be removed from service to ensure the integrity of the reactor coolant system pressure boundary.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	NL-07-039	<p>A.2.1.15 A.3.1.15 B.1.16</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
10	<p>Enhance the Heat Exchanger Monitoring Program for IP2 and IP3 to include the following heat exchangers in the scope of the program.</p> <ul style="list-style-type: none"> • Safety injection pump lube oil heat exchangers • RHR heat exchangers • RHR pump seal coolers • Non-regenerative heat exchangers • Charging pump seal water heat exchangers • Charging pump fluid drive coolers • Charging pump crankcase oil coolers • Spent fuel pit heat exchangers • Secondary system steam generator sample coolers • Waste gas compressor heat exchangers • SBO/Appendix R diesel jacket water heat exchanger (IP2 only) <p>Enhance the Heat Exchanger Monitoring Program for IP2 and IP3 to perform visual inspection on heat exchangers where non-destructive examination, such as eddy current inspection, is not possible due to heat exchanger design limitations.</p> <p>Enhance the Heat Exchanger Monitoring Program for IP2 and IP3 to include consideration of material-environment combinations when determining sample population of heat exchangers.</p> <p>Enhance the Heat Exchanger Monitoring Program for IP2 and IP3 to establish minimum tube wall thickness for the new heat exchangers identified in the scope of the program. Establish acceptance criteria for heat exchangers visually inspected to include no indication of tube erosion, vibration wear, corrosion, pitting, fouling, or scaling.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p> <p>NL-09-018</p>	<p>A.2.1.16 A.3.1.16 B.1.17, Audit Item 52</p>
11	Delete commitment.		NL-09-056	

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
12	Enhance the Masonry Wall Program for IP2 and IP3 to specify that the IP1 intake structure is included in the program.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039	A.2.1.18 A.3.1.18 B.1.19
13	<p>Enhance the Metal-Enclosed Bus Inspection Program to add IP2 480V bus associated with substation A to the scope of bus inspected.</p> <p>Enhance the Metal-Enclosed Bus Inspection Program for IP2 and IP3 to visually inspect the external surface of MEB enclosure assemblies for loss of material at least once every 10 years. The first inspection will occur prior to the period of extended operation and the acceptance criterion will be no significant loss of material.</p> <p>Enhance the Metal-Enclosed Bus Inspection Program to add acceptance criteria for MEB internal visual inspections to include the absence of indications of dust accumulation on the bus bar, on the insulators, and in the duct, in addition to the absence of indications of moisture intrusion into the duct.</p> <p>Enhance the Metal-Enclosed Bus Inspection Program for IP2 and IP3 to inspect bolted connections at least once every five years if performed visually or at least once every ten years using quantitative measurements such as thermography or contact resistance measurements. The first inspection will occur prior to the period of extended operation.</p> <p>The plant will process a change to applicable site procedure to remove the reference to "re-torquing" connections for phase bus maintenance and bolted connection maintenance.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p> <p>NL-08-057</p>	<p>A.2.1.19 A.3.1.19 B.1.20 Audit Items 124, 133, 519</p>
14	Implement the Non-EQ Bolted Cable Connections Program for IP2 and IP3 as described in LRA Section B.1.22.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039	A.2.1.21 A.3.1.21 B.1.22

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
15	<p>Implement the Non-EQ Inaccessible Medium-Voltage Cable Program for IP2 and IP3 as described in LRA Section B.1.23.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801 Section XI.E3, Inaccessible Medium-Voltage Cables Not Subject To 10 CFR 50.49 Environmental Qualification Requirements.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p>	<p>A.2.1.22 A.3.1.22 B.1.23 Audit item 173</p>
16	<p>Implement the Non-EQ Instrumentation Circuits Test Review Program for IP2 and IP3 as described in LRA Section B.1.24.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801 Section XI.E2, Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p>	<p>A.2.1.23 A.3.1.23 B.1.24 Audit item 173</p>
17	<p>Implement the Non-EQ Insulated Cables and Connections Program for IP2 and IP3 as described in LRA Section B.1.25.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801 Section XI.E1, Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p>	<p>A.2.1.24 A.3.1.24 B.1.25 Audit item 173</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
18	<p>Enhance the Oil Analysis Program for IP2 to sample and analyze lubricating oil used in the SBO/Appendix R diesel generator consistent with oil analysis for other site diesel generators.</p> <p>Enhance the Oil Analysis Program for IP2 and IP3 to sample and analyze generator seal oil and turbine hydraulic control oil.</p> <p>Enhance the Oil Analysis Program for IP2 and IP3 to formalize preliminary oil screening for water and particulates and laboratory analyses including defined acceptance criteria for all components included in the scope of this program. The program will specify corrective actions in the event acceptance criteria are not met.</p> <p>Enhance the Oil Analysis Program for IP2 and IP3 to formalize trending of preliminary oil screening results as well as data provided from independent laboratories.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	NL-07-039	<p>A.2.1.25 A.3.1.25 B.1.26</p>
19	<p>Implement the One-Time Inspection Program for IP2 and IP3 as described in LRA Section B.1.27.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801, Section XI.M32, One-Time Inspection.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p>	<p>A.2.1.26 A.3.1.26 B.1.27 Audit item 173</p>
20	<p>Implement the One-Time Inspection – Small Bore Piping Program for IP2 and IP3 as described in LRA Section B.1.28.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801, Section XI.M35, One-Time Inspection of ASME Code Class I Small-Bore Piping.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p>	<p>A.2.1.27 A.3.1.27 B.1.28 Audit item 173</p>
21	<p>Enhance the Periodic Surveillance and Preventive Maintenance Program for IP2 and IP3 as necessary to assure that the effects of aging will be managed such that applicable components will continue to perform their intended functions consistent with the current licensing basis through the period of extended operation.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	NL-07-039	<p>A.2.1.28 A.3.1.28 B.1.29</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
22	Enhance the Reactor Vessel Surveillance Program for IP2 and IP3 revising the specimen capsule withdrawal schedules to draw and test a standby capsule to cover the peak reactor vessel fluence expected through the end of the period of extended operation. Enhance the Reactor Vessel Surveillance Program for IP2 and IP3 to require that tested and untested specimens from all capsules pulled from the reactor vessel are maintained in storage.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039	A.2.1.31 A.3.1.31 B.1.32
23	Implement the Selective Leaching Program for IP2 and IP3 as described in LRA Section B.1.33. This new program will be implemented consistent with the corresponding program described in NUREG-1801, Section XI.M33 Selective Leaching of Materials.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039 NL-07-153	A.2.1.32 A.3.1.32 B.1.33 Audit item 173
24	Enhance the Steam Generator Integrity Program for IP2 and IP3 to require that the results of the condition monitoring assessment are compared to the operational assessment performed for the prior operating cycle with differences evaluated.	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039	A.2.1.34 A.3.1.34 B.1.35
25	Enhance the Structures Monitoring Program to explicitly specify that the following structures are included in the program. <ul style="list-style-type: none"> Appendix R diesel generator foundation (IP3) Appendix R diesel generator fuel oil tank vault (IP3) Appendix R diesel generator switchgear and enclosure (IP3) city water storage tank foundation condensate storage tanks foundation (IP3) containment access facility and annex (IP3) discharge canal (IP2/3) emergency lighting poles and foundations (IP2/3) fire pumphouse (IP2) fire protection pumphouse (IP3) fire water storage tank foundations (IP2/3) gas turbine 1 fuel storage tank foundation maintenance and outage building-elevated passageway (IP2) 	IP2: September 28, 2013 IP3: December 12, 2015	NL-07-039 NL-07-153 NL-08-057	A.2.1.35 A.3.1.35 B.1.36 Audit items 86, 87, 88, 417

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
	<ul style="list-style-type: none"> • new station security building (IP2) • nuclear service building (IP1) • primary water storage tank foundation (IP3) • refueling water storage tank foundation (IP3) • security access and office building (IP3) • service water pipe chase (IP2/3) • service water valve pit (IP3) • superheater stack • transformer/switchyard support structures (IP2) • waste holdup tank pits (IP2/3) <p>Enhance the Structures Monitoring Program for IP2 and IP3 to clarify that in addition to structural steel and concrete, the following commodities (including their anchorages) are inspected for each structure as applicable.</p> <ul style="list-style-type: none"> • cable trays and supports • concrete portion of reactor vessel supports • conduits and supports • cranes, rails and girders • equipment pads and foundations • fire proofing (pyrocrete) • HVAC duct supports • jib cranes • manholes and duct banks • manways, hatches and hatch covers • monorails • new fuel storage racks • sumps, sump screens, strainers and flow barriers <p>Enhance the Structures Monitoring Program for IP2 and IP3 to inspect inaccessible concrete areas that are exposed by excavation for any reason. IP2 and IP3 will also inspect inaccessible concrete areas in environments where observed conditions in accessible areas exposed to the same environment indicate that significant concrete degradation is occurring.</p> <p>Enhance the Structures Monitoring Program for IP2 and IP3 to perform inspections of elastomers (seals, gaskets, seismic joint filler, and roof elastomers) to</p>			

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
	<p>identify cracking and change in material properties and for inspection of aluminum vents and louvers to identify loss of material.</p> <p>Enhance the Structures Monitoring Program for IP2 and IP3 to perform an engineering evaluation of groundwater samples to assess aggressiveness of groundwater to concrete on a periodic basis (at least once every five years). IPEC will obtain samples from at least 5 wells that are representative of the ground water surrounding below-grade site structures and perform an engineering evaluation of the results from those samples for sulfates, pH and chlorides. Additionally, to assess potential indications of spent fuel pool leakage, IPEC will sample for tritium in groundwater wells in close proximity to the IP2 spent fuel pool at least once every 3 months.</p> <p>Enhance the Structures Monitoring Program for IP2 and IP3 to perform inspection of normally submerged concrete portions of the intake structures at least once every 5 years. Inspect the baffling/grating partition and support platform of the IP3 intake structure at least once every 5 years.</p> <p>Enhance the Structures Monitoring Program for IP2 and IP3 to perform inspection of the degraded areas of the water control structure once per 3 years rather than the normal frequency of once per 5 years during the PEO.</p>		NL-08-127	<p>Audit Item 360</p> <p>Audit Item 358</p>
26	<p>Implement the Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS) Program for IP2 and IP3 as described in LRA Section B.1.37.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801, Section XI.M12, Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS) Program.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p>	<p>A.2.1.36 A.3.1.36 B.1.37 Audit item 173</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
27	<p>Implement the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program for IP2 and IP3 as described in LRA Section B.1.38.</p> <p>This new program will be implemented consistent with the corresponding program described in NUREG-1801 Section XI.M13, Thermal Aging and Neutron Embrittlement of Cast Austenitic Stainless Steel (CASS) Program.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-07-153</p>	<p>A.2.1.37 A.3.1.37 B.1.38 Audit item 173</p>
28	<p>Enhance the Water Chemistry Control – Closed Cooling Water Program to maintain water chemistry of the IP2 SBO/Appendix R diesel generator cooling system per EPRI guidelines.</p> <p>Enhance the Water Chemistry Control – Closed Cooling Water Program to maintain the IP2 and IP3 security generator and fire protection diesel cooling water pH and glycol within limits specified by EPRI guidelines.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-07-039</p> <p>NL-08-057</p>	<p>A.2.1.39 A.3.1.39 B.1.40 Audit item 509</p>
29	Enhance the Water Chemistry Control – Primary and Secondary Program for IP2 to test sulfates monthly in the RWST with a limit of <150 ppb.	IP2: September 28, 2013	NL-07-039	A.2.1.40 B.1.41
30	For aging management of the reactor vessel internals, IPEC will (1) participate in the industry programs for investigating and managing aging effects on reactor internals; (2) evaluate and implement the results of the industry programs as applicable to the reactor internals; and (3) upon completion of these programs, but not less than 24 months before entering the period of extended operation, submit an inspection plan for reactor internals to the NRC for review and approval.	<p>IP2: September 28, 2011</p> <p>IP3: December 12, 2013</p>	NL-07-039	A.2.1.41 A.3.1.41
31	Additional P-T curves will be submitted as required per 10 CFR 50, Appendix G prior to the period of extended operation as part of the Reactor Vessel Surveillance Program.	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	NL-07-039	A.2.2.1.2 A.3.2.1.2 4.2.3
32	As required by 10 CFR 50.61(b)(4), IP3 will submit a plant-specific safety analysis for plate B2803-3 to the NRC three years prior to reaching the RT _{PTS} screening criterion. Alternatively, the site may choose to implement the revised PTS rule when approved.	IP3: December 12, 2015	<p>NL-07-039</p> <p>NL-08-127</p>	A.3.2.1.4 4.2.5

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
33	<p>At least 2 years prior to entering the period of extended operation, for the locations identified in LRA Table 4.3-13 (IP2) and LRA Table 4.3-14 (IP3), under the Fatigue Monitoring Program, IP2 and IP3 will implement one or more of the following:</p> <p>(1) Consistent with the Fatigue Monitoring Program, Detection of Aging Effects, update the fatigue usage calculations using refined fatigue analyses to determine valid CUFs less than 1.0 when accounting for the effects of reactor water environment. This includes applying the appropriate Fen factors to valid CUFs determined in accordance with one of the following:</p> <ol style="list-style-type: none"> 1. For locations in LRA Table 4.3-13 (IP2) and LRA Table 4.3-14 (IP3), with existing fatigue analysis valid for the period of extended operation, use the existing CUF. 2. Additional plant-specific locations with a valid CUF may be evaluated. In particular, the pressurizer lower shell will be reviewed to ensure the surge nozzle remains the limiting component. 3. Representative CUF values from other plants, adjusted to or enveloping the IPEC plant specific external loads may be used if demonstrated applicable to IPEC. 4. An analysis using an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case) may be performed to determine a valid CUF. <p>(2) Consistent with the Fatigue Monitoring Program, Corrective Actions, repair or replace the affected locations before exceeding a CUF of 1.0.</p>	<p>IP2: September 28, 2011</p> <p>IP3: December 12, 2013</p>	<p>NL-07-039</p> <p>NL-07-153</p> <p>NL-08-021</p>	<p>A.2.2.2.3 A.3.2.2.3 4.3.3 Audit item 146</p>
34	<p>IP2 SBO / Appendix R diesel generator will be installed and operational by April 30, 2008. This committed change to the facility meets the requirements of 10 CFR 50.59(c)(1) and, therefore, a license amendment pursuant to 10 CFR 50.90 is not required.</p>	<p>April 30, 2008</p> <p>Complete</p>	<p>NL-07-078</p> <p>NL-08-074</p>	<p>2.1.1.3.5</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
35	<p>Perform a one-time inspection of representative sample area of IP2 containment liner affected by the 1973 event behind the insulation, prior to entering the extended period of operation, to assure liner degradation is not occurring in this area.</p> <p>Perform a one-time inspection of representative sample area of the IP3 containment steel liner at the juncture with the concrete floor slab, prior to entering the extended period of operation, to assure liner degradation is not occurring in this area.</p> <p>Any degradation will be evaluated for updating of the containment liner analyses as needed.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	<p>NL-08-127</p> <p>NL-09-018</p>	Audit Item 27
36	<p>Perform a one-time inspection and evaluation of a sample of potentially affected IP2 refueling cavity concrete prior to the period of extended operation. The sample will be obtained by core boring the refueling cavity wall in an area that is susceptible to exposure to borated water leakage. The inspection will include an assessment of embedded reinforcing steel.</p> <p>Additional core bore samples will be taken, if the leakage is not stopped, prior to the end of the first ten years of the period of extended operation.</p> <p>A sample of leakage fluid will be analyzed to determine the composition of the fluid. If additional core samples are taken prior to the end of the first ten years of the period of extended operation, a sample of leakage fluid will be analyzed.</p>	<p>IP2: September 28, 2013</p>	<p>NL-08-127</p> <p>NL-09-056</p> <p>NL-09-079</p>	Audit Item 359
37	<p>Enhance the Containment Inservice Inspection (CII-IWL) Program to include inspections of the containment using enhanced characterization of degradation (i.e., quantifying the dimensions of noted indications through the use of optical aids) during the period of extended operation. The enhancement includes obtaining critical dimensional data of degradation where possible through direct measurement or the use of scaling technologies for photographs, and the use of consistent vantage points for visual inspections.</p>	<p>IP2: September 28, 2013</p> <p>IP3: December 12, 2015</p>	NL-08-127	Audit Item 361

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
38	For Reactor Vessel Fluence, should future core loading patterns invalidate the basis for the projected values of RTpts or C _V USE, updated calculations will be provided to the NRC.	IP2: September 28, 2013 IP3: December 12, 2015	NL-08-143	4.2.1
39	Deleted		NL-09-079	
40	Evaluate plant specific and appropriate industry operating experience and incorporate lessons learned in establishing appropriate monitoring and inspection frequencies to assess aging effects for the new aging management programs. Documentation of the operating experience evaluated for each new program will be available on site for NRC review prior to the period of extended operation.	IP2: September 28, 2013 IP3: December 12, 2015	NL-09-106	B.1.6 B.1.22 B.1.23 B.1.24 B.1.25 B.1.27 B.1.28 B.1.33 B.1.37 B.1.38