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October 18, 2011

**VIA ELECTRONIC MAIL AND FEDERAL EXPRESS**

Deborah Brancato  
Staff Attorney  
Riverkeeper, Inc.  
20 Secor Road  
Ossining, New York 10562

**Re: Entergy Nuclear Operations, Inc. (Indian Point Nuclear Generating  
Units 2 and 3), Docket Nos. 50-247-LR and 50-286-LR**

Dear Ms. Brancato:

This is a response, on behalf of Entergy Nuclear Operations, Inc. (“Entergy”), to your letters dated September 1 and 26, 2011 seeking documents pursuant to 10 C.F.R. § 2.336. As an initial matter, Entergy restates its objection to Riverkeeper’s ongoing discovery requests because Riverkeeper may not seek discovery in this proceeding from Entergy, whether by interrogatories or otherwise, except as permitted in 10 C.F.R. § 2.336(a). Nonetheless, in the spirit of cooperation, but without waiving these objections or conceding that the documents discussed below are relevant or material to the admitted contentions, Entergy provides the following clarification of information provided in our previous response to your letters seeking documents related to the metal fatigue contention, and provides two additional documents that we understand will complete Entergy’s responses to your requests.

Since your initial May 13, 2011 letter seeking documents related to Riverkeeper Contention TC-1B (Metal Fatigue), Entergy has diligently worked to respond to Riverkeeper’s requests and provided numerous additional documents to Riverkeeper. As our associates, Jon Rund and Ray Kuyler, discussed with you on October 14, we understand that there are two remaining requests.

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First, on September 1, 2011, Riverkeeper asked for “Indian Point specific plant data” used in the June 2010 Westinghouse environmentally-assisted fatigue evaluations for certain components. Specifically, you asked whether WCAP-14950, “Mitigation and Evaluation of Pressurizer Insurge/Outsurge Transients” (Proprietary Log No. 572, Production No. IPECPROP00059247) (“WCAP-14950”) contains the referenced plant data, or, if not, where such information was located. As discussed on the October 14 telephone conference, this information is provided in two different documents that Entergy has already disclosed to Riverkeeper, and that we referenced in our August 10, 2011 letter to Riverkeeper:

- Westinghouse Calculation Note Number CN-PAFM-09-63, Rev. 0, “Indian Point unit 2 Pressurizer Insurge/Outsurge Transient Development,” (Proprietary Log No. 561, Production No. IPECPROP00057991) and
- Westinghouse Calculation Note Number CN-PAFM-09-64, Rev. 0, “Indian Point Unit 3 Pressurizer Insurge/Outsurge Transient Development,” (Log No. 562, Production Number IPECPROP00058077).

As Mr. Rund and Mr. Kuyler further explained, the raw data referenced in these two calculations is voluminous, would be burdensome to obtain and produce, and would be of little use to Riverkeeper. We understand that you agree. Therefore, Entergy has fully responded to your request for plant data.

Second, on May 13, 2011, Riverkeeper asked for information on the heat transfer coefficient equations used in Westinghouse’s June 2010 environmentally-assisted fatigue evaluations. Entergy responded to that request in its August 8 and September 8, 2011 letters. More recently, on September 26, 2011, Riverkeeper agreed that WCAP-14950 provides this information for the pressurizer surge nozzles, but asked “whether any such comparable information/documents exist for other components, including but not limited to the other components listed in Tables 4.3-13 and 4.3-14 of Entergy’s License Renewal Application (i.e., the vessel shell and lower head/bottom head to shell; vessel inlet and outlet nozzles; RCS piping charging system nozzle; RCS piping safety injection nozzle; and RHR Class 1 piping)[.]”

In response to this additional request, Entergy provides two new documents: (1) Combustion Engineering, Inc., “Analytical Report for Indian Point Reactor Vessel – Unit 2,” CENC 1110, January 1967; and (2) Combustion Engineering, Inc., “Analytical Report for Indian Point Reactor Vessel – Unit 3,” CENC 1122, June 1969. A copy of each document is on the enclosed compact disc (“CD”), in TIFF file format. These documents will be listed in the next update to Entergy’s mandatory disclosures. By producing the enclosed documents, Entergy does not necessarily concede that the documents are in fact relevant or material to the admitted contentions.

For your convenience, the following table lists the components in Tables 4.3-13 and 4.3-14 of the License Renewal Application, and identifies the documents Entergy has produced that provide information on the heat transfer coefficients used in the fatigue analysis of each location.

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These tables therefore show that Entergy has fully responded to your request for information on heat transfer coefficients.

**IPEC Unit 2 (LRA Table 4.3-13)**

Location	Document
Vessel shell and lower head - Bottom head to shell	Combustion Engineering, Inc., "Analytical Report for Indian Point Reactor Vessel – Unit 2," CENC 1110, January 1967 (on attached CD)
Vessel inlet and outlet nozzles – Reactor vessel inlet nozzle	Combustion Engineering, Inc., "Analytical Report for Indian Point Reactor Vessel – Unit 2," CENC 1110, January 1967 (on attached CD)
Vessel inlet and outlet nozzles – Reactor vessel outlet nozzle	Combustion Engineering, Inc., "Analytical Report for Indian Point Reactor Vessel – Unit 2," CENC 1110, January 1967 (on attached CD)
Pressurizer surge line nozzles – Pressurizer surge nozzle	Westinghouse Calculation Note Number CN-PAFM-09-100, Rev. 0, "Indian Point Unit 2 Insurge/Outsurge and Environmental Fatigue Evaluations," (Proprietary Log No. 563, Production No. IPECPROP00058158); and  WCAP-14950 (Proprietary Log No. 572, Production No. IPECPROP00059247)
Pressurizer surge line nozzles – Surge line piping to safe end weld	Westinghouse Calculation Note Number CN-PAFM-09-117, Rev. 0, "Indian Point Units 2 and 3 Hot Leg Surge Nozzle Environmental Fatigue Evaluations," (Proprietary Log No. 551, Production No. IPECPROP00057247)
RCS piping charging system nozzle – Charging system nozzle	Westinghouse Calculation Note Number CN-PAFM-09-21, Rev. 0, "Indian Point Units 2 and 3 Charging Nozzles Environmental Fatigue Evaluation," (Proprietary Log No. 553, Production No. IPECPROP00057382)
RCS piping safety injection nozzle	Westinghouse Calculation Note Number CN-PAFM-09-79, Rev. 0, "Indian Point Unit 2 Boron Injection Tank Nozzle Environmental Fatigue Evaluations," (Proprietary Log No. 555, Production No. IPECPROP00057531)
RHR class 1 piping	Westinghouse Calculation Note Number CN-PAFM-09-77, Rev. 0, "Indian Point Units 2 and 3 Accumulator Nozzle Environmental Fatigue Evaluation," (Proprietary Log No. 559, Production No. IPECPROP00057823)

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**IPEC Unit 3 (LRA Table 4.3-14)**

<b>Location</b>	<b>Document</b>
Vessel shell and lower head - Bottom head to shell	Combustion Engineering, Inc., "Analytical Report for Indian Point Reactor Vessel – Unit 3," CENC 1122, June 1969 (on attached CD)
Vessel inlet and outlet nozzles – Reactor vessel inlet nozzle	Combustion Engineering, Inc., "Analytical Report for Indian Point Reactor Vessel – Unit 3," CENC 1122, June 1969 (on attached CD)
Vessel inlet and outlet nozzles – Reactor vessel outlet nozzle	Combustion Engineering, Inc., "Analytical Report for Indian Point Reactor Vessel – Unit 3," CENC 1122, June 1969 (on attached CD)
Pressurizer surge line nozzles – Pressurizer surge line nozzle	Westinghouse Calculation Note Number CN-PAFM-09-105, Rev. 0, "Indian Point Unit 3 Insurge/Outsurge and Environmental Fatigue Evaluations," (Proprietary Log No. 564, Production No. IPECPROP00058206); and  WCAP-14950 (Proprietary Log No. 572, Production No. IPECPROP00059247)
Pressurizer surge line nozzles – Surge line piping to safe end weld	Westinghouse Calculation Note Number CN-PAFM-09-117, Rev. 0, "Indian Point Units 2 and 3 Hot Leg Surge Nozzle Environmental Fatigue Evaluations," (Proprietary Log No. 551, Production No. IPECPROP00057247)
RCS piping charging system nozzle	Westinghouse Calculation Note Number CN-PAFM-09-21, Rev. 0, "Indian Point Units 2 and 3 Charging Nozzles Environmental Fatigue Evaluation," (Proprietary Log No. 553, Production No. IPECPROP00057382)
RCS piping safety injection nozzle	Westinghouse Calculation Note CN-PAFM-09-74, Rev. 0, "Indian Point Unit 3 Boron Injection Tank Nozzle Environmental Fatigue Evaluations," (Proprietary Log No. 557, Production No. IPECPROP00057667)
RHR class 1 piping	Westinghouse Calculation Note Number CN-PAFM-09-77, Rev. 0, "Indian Point Units 2 and 3 Accumulator Nozzle Environmental Fatigue Evaluation," (Proprietary Log No. 559, Production No. IPECPROP00057823)

In summary, based on the October 14 teleconference and your October 17 e-mail, the new documents in the attached CD, along with the clarifications in this letter and the numerous other documents disclosed by Entergy on this contention, complete Entergy's responses to Riverkeeper's September 1 and September 26, 2011 document requests, and complete Entergy's responses to all Riverkeeper document requests in this matter. Therefore, Entergy has complied

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with the Board's October 7, 2011 Order, directing Entergy and Riverkeeper to attempt to resolve all outstanding disclosure issues "with all deliberate speed."

Sincerely,

*Signed (electronically) by Paul M. Bessette*  
Kathryn M. Sutton, Esq.  
Paul M. Bessette, Esq.  
Counsel for Entergy Nuclear Operations, Inc.

Enclosure: (CD)

cc: Sherwin Turk