

**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD**

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In re:	Docket Nos. 50-247-LR; 50-286-LR
License Renewal Application Submitted by	ASLBP No. 07-858-03-LR-BD01
Entergy Nuclear Indian Point 2, LLC,	DPR-26, DPR-64
Entergy Nuclear Indian Point 3, LLC, and	May 3, 2013
Entergy Nuclear Operations, Inc.	
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**STATE OF NEW YORK'S  
REPLY TO ENTERGY'S AND NRC STAFF'S  
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW FOR  
CONSOLIDATED CONTENTION NYS-6/7**

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Pursuant to 10 C.F.R. § 2.712, the Atomic Safety Licensing Board's ("ASLB" or "Board") July 1, 2010 Scheduling Order at ¶ N, and the Board's February 28, 2013 Order, the State of New York hereby replies to Entergy and NRC Staff's Post-Hearing Proposed Findings of Fact and Conclusions of Law.

## INTRODUCTION

Entergy's and Staff's Proposed Findings of Fact and Conclusions of Law provide no basis in law or fact to support a Board decision that the aging effects caused by moisture on non-environmentally qualified underground low- and medium-voltage power cables will be adequately managed by Entergy's proposed aging management program for those cables.<sup>1</sup> Thus, there is no basis to rule in their favor on Contention NYS-6/7.

In fact, NRC Staff asks this Board to conclude, as a matter of law, that Entergy's Cable Reliability Program (EN-DC-346), an internal corporate implementing procedure, provides the required reasonable assurance that the underground power cables will perform their function during the license renewal term, and not Entergy's skeletal Aging Management Program (or "AMP") which is incorporated in its License Renewal Application.

Although Entergy claims that the proposed AMP itself is sufficient because it complies with the guidance in the GALL Report,<sup>2</sup> in its pre-filed testimony Entergy's independent cable insulation expert testified that Entergy's AMP provides the reasonable assurance required by the

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<sup>1</sup> Entergy's AMP describes the cables exposed to significant moisture as "inaccessible." Because their inaccessibility is caused by their location underground, they will be referred to as underground cables to avoid confusion with above ground cables that are inaccessible because they are located in a conduit or cable tray.

<sup>2</sup> NYS00147A-D, NUREG 1801, Rev. 2, Generic Aging Lessons Learned (GALL) Report (December 2010) ("GALL Rev. 2").

regulations *if* the AMP “is implemented in accordance” with EN-DC-346.<sup>3</sup> In its Proposed Findings of Fact, Entergy also relies heavily on its corporate implementing procedure to provide reasonable assurance and argues extensively that these internal procedures are enforceable, either as license conditions or UFSAR commitments.<sup>4</sup>

In truth, none of the detailed requirements of EN-DC-346 are legally enforceable or subject to review under 10 C.F.R. § 50.59. As a matter of law, Entergy could change any of these requirements without ever informing NRC Staff. Thus neither Entergy’s AMP, nor its implementing procedures are sufficient, and the Board should rule in New York State’s favor on Contention NYS-6/7.

## POINT I

### **ENTERGY’S CABLE RELIABILITY PROGRAM, WHICH NRC STAFF ACKNOWLEDGES PROVIDES THE REASONABLE ASSURANCE REQUIRED BY 10 C.F.R. § 54.29(A), IS NOT PART OF ENTERGY’S LRA, AMP, OR UFSAR AND IS NOT LEGALLY ENFORCEABLE UNDER NRC REGULATIONS**

NRC Staff asks the Board to conclude, as a matter of law, that Entergy’s Cable Reliability Program (EN-DC-346) and not its AMP, will adequately manage the effects of aging on underground, non-environmentally qualified (“Non-EQ”) power cables exposed to significant moisture and that it is the Cable Reliability Program, and not the AMP document, that provides the required reasonable assurance that the activities authorized by the renewed operating licenses

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<sup>3</sup> Testimony of Entergy Witnesses Alan B. Cox, Roger B. Rucker, Thomas S. McCaffrey and Howard G. Sedding Concerning Contentions NYS-6/NYS-7 (Non-EQ Inaccessible Medium- and Low-Voltage Cables) (Mar. 29, 2012) (“Entergy Pre-Filed Testimony”) ENT000233 at 43-46, A.72.

<sup>4</sup> Entergy’s Proposed Findings of Fact and Conclusions of Law for Contentions NYS-6 and NYS-7 (Non-Environmentally Qualified Inaccessible Medium- and Low-Voltage Cables) (Mar. 22, 2013) (ML13081A741) (“Entergy Proposed Findings”) at ¶¶ 90-92, 137-152.

will continue to be conducted in accordance with the CLB.<sup>5</sup> The State agrees with this proposed Conclusion of Law. The skeletal aging management program included in Entergy's License Renewal Application is plainly insufficient.

In fact, NRC Staff describes the Cable Reliability Program as “an AMP addressing moisture,” thus conflating a set of corporate implementing procedures with a legally enforceable license commitment.<sup>6</sup> Despite characterizing the Cable Reliability Program as the AMP, NRC Staff also asks the Board to find, as a matter of fact, that there is no need for the Cable Reliability Program to be incorporated as a license condition or a UFSAR commitment or become otherwise legally enforceable because existing NRC regulations, such as 10 CFR § 50.59, will suffice to control any changes in the program.<sup>7</sup> Here the State and NRC Staff diverge. It is the applicant's legally enforceable AMP that must provide reasonable assurance, not a series of ancillary corporate documents that are not submitted to the Board and NRC Staff with the license renewal application but are instead generated after the license renewal audit.

Entergy asserts that one of the issues to be resolved by the Board is whether Entergy's AMP – “either by itself or *together with implementing procedure EN-DC-346*” (Cable Reliability Program) provides reasonable assurance that Entergy will manage the aging effects on the affected cables during the period of extended operation.<sup>8</sup> Although Entergy asserts that

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<sup>5</sup> NRC Staff's Proposed Findings of Fact and Conclusions of Law Part 3: Contention NYS-6/7 (Non-EQ Inaccessible Medium and Low Voltage Cables) (Mar. 22, 2013) (ML13081A741) (“NRC Staff Proposed Findings”) at ¶ 3.123.

<sup>6</sup> NRC Staff Proposed Findings at ¶ 3 assert that the Cable Reliability Program is sufficient “as an *AMP addressing moisture*.” (emphasis added).

<sup>7</sup> NRC Staff Proposed Findings at ¶¶ 3.114, 3.115.

<sup>8</sup> Entergy Proposed Findings (emphasis added) at ¶ 77.

the AMP, standing alone, is sufficient,<sup>9</sup> it is the only party to do so – NRC Staff and the State agree that the Cable Reliability Program is necessary to the finding of reasonable assurance. And even Entergy hedges its bet on this legal claim, by arguing at length that reasonable assurance is provided by the alleged incorporation of the essential elements of EN-DC-346 into binding and enforceable license renewal commitments, and by Entergy’s alleged inability to change other elements of EN-DC-346 without the NRC knowing about those changes. Entergy also asks the Board to find that the implementing procedure is “sufficiently ‘linked’” to the AMP.<sup>10</sup> Entergy offers no legal basis for the proposition that a document “linked” to the AMP, but which is not the AMP and is not itself legally enforceable, can contribute to a finding of reasonable assurance for the AMP. In addition, both NRC Staff and Entergy misinterpret the operation of 10 C.F.R § 50.59 and Entergy confuses voluntary internal corporate procedures with legally required ones.

**A. The Details of EN-DC-346 Are Not Binding and Enforceable License Renewal Commitments**

Entergy correctly states that commitments written in a renewed license become a legally binding part of the license and can only be changed through a license amendment.<sup>11</sup> In order to change commitments incorporated in the Updated Final Safety Analysis Report (“UFSAR”), Entergy must seek a license amendment pursuant to 10 C.F.R. § 50.59 unless the proposed change meets all the criteria of 10 C.F.R. § 50.59(c)(1).<sup>12</sup> If Entergy concludes that the § 50.59

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<sup>9</sup> Entergy Proposed Findings at ¶¶ 86-88.

<sup>10</sup> Entergy Proposed Findings at ¶¶ 86-88, 90-92, 137-152.

<sup>11</sup> Entergy Proposed Findings at ¶ 114.

<sup>12</sup> Entergy Proposed Findings at ¶ 114. A detailed discussion of the requirements of 10 C.F.R.

criteria are met, then Entergy can make the change without immediately notifying NRC Staff or obtaining a license amendment. But the details that NRC Staff and the State find critical to the viability of the AMP are not license commitments, and the actual commitment Entergy offers is devoid of any meaningful detail.

**1. Entergy's License Renewal Commitment for Underground Non-EQ Power Cable AMP**

Commitment 15 in Entergy's amended License Renewal Application ("LRA") is set forth below in its entirety:

Implement the Non-EQ Inaccessible Medium-Voltage Cable Program for IP2 and IP3 as described in LRA Section B.1.23.

This new program will be implemented consistent with the corresponding program described in NUREG-1801 Section XI.E3, Inaccessible Medium-Voltage Power Cables Not Subject To 10 CFR 50.49 Environmental Qualification Requirements.<sup>13</sup>

The program description of the non-EQ underground power cable AMP to which Entergy refers in Commitment 15, states in its entirety:

The Non-EQ Inaccessible Medium-Voltage Cable Program is a new program that entails periodic inspections for water collection in cable manholes and periodic testing of cables. In scope medium-voltage cables (cables with operating voltage from 2kV to 35kV) and low-voltage power cables (400 V to 2 kV) exposed to significant moisture will be tested at least once every six years to provide an indication of the condition of the conductor insulation. Test frequencies will be adjusted based on test results and operating experience. The program includes inspections for water accumulation in manholes at least once every year (annually). In addition to the periodic manhole inspections, manhole inspection for water after events, such as heavy rain or flooding will be performed.

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§ 50.59 is contained at ¶¶ 39-43 of the State of New York's Proposed Findings of Fact and Conclusions of Law as to Consolidated Contention NYS-6/7 (Mar. 22, 2013) ("State Proposed Findings").

<sup>13</sup> NYS000154, Entergy Response (NL-11-096) to Request for Additional Information for the Review of Indian Point Nuclear Generating Units Nos. 2 and 3 (Aug. 9, 2011) (ML11229A803) ("Entergy Aug. 9, 2011 Response") at Attachment 2, page 8.

Inspection frequency will be increased as necessary based on evaluation of inspection results.<sup>14</sup>

In sum, Commitment 15 in Entergy's Amended License Renewal Application is essentially just a commitment to implement the bare-bones AMP statements set out above that Entergy asserts constitutes an actual aging management program. That ostensible AMP contains none of the detail in Entergy's 34-page Cable Reliability Program, EN-DC-346. Therefore, EN-DC-346 will not become a legally binding condition in Entergy's renewed license and Entergy's failure to follow it will not be the basis for a direct violation of the license.

Entergy, however, has provided a compelling legal reason why EN-DC-346 should be a binding commitment in the renewed license. As Entergy witness Alan B. Cox testified, Entergy developed EN-DC-346 to ensure that it satisfied LRA Commitment 15 to implement an AMP consistent with GALL Rev. 2.<sup>15</sup> Since EN-DC-346 is the vehicle which satisfies the binding commitment in the LRA, it should be equally binding on the applicant.

## **2. UFSAR Program Description of Entergy's AMP for Non-EQ Underground Power Cables**

Entergy's description in the UFSAR of its AMP for Non-EQ Underground Power cables is set forth below in its entirety:

The Non-EQ Inaccessible Medium-Voltage Cable Program is a new program that entails periodic and event driven inspections for water collection in cable manholes, and periodic testing of cables. In scope medium voltage cables (cables with operating voltage from 2kV to 35kV) and low-voltage power cables (400 V to 2 kV) exposed to significant moisture will be tested at least once every six years to provide an indication of the condition of the conductor insulation. Test frequencies are adjusted based on test results and operating experience.

The program includes periodic inspections for water accumulation in manholes at least once every year (annually). In addition to the periodic manhole inspections,

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<sup>14</sup> NYS000154 Entergy Aug. 9, 2011 Response at Attachment 1, page 2.

<sup>15</sup> Entergy Proposed Findings at ¶ 91, *citing* Tr. 4030:12-19 (Cox).



manhole inspection for water after events, such as heavy rain or flooding will be performed. Inspection frequency will be increased as necessary based on evaluation of inspection results.<sup>16</sup>

As with the amended LRA, the language in the UFSAR simply repeats the bare-bones language of the ostensible AMP and contains none of the detail in Entergy's 34-page Cable Reliability Program, EN-DC-346.<sup>17</sup>

As set forth below, because the details of EN-DC-346 are not incorporated in the USFAR, Entergy can change many of its requirements without conducting an evaluation under 10 C.F.R. § 50.59 or ever informing the NRC that such changes have occurred.

**B. The Requirements of 10 C.F.R. § 50.59 Apply Only to Elements of an AMP That Are Explicitly Incorporated in the UFSAR**

In brief summary, NRC Staff testified that only those elements of an AMP that are explicitly incorporated in the UFSAR must be evaluated under 10 C.F.R. § 50.59 to determine whether any change requires notice to the NRC and a license amendment.<sup>18</sup> Entergy witness Alan Cox gave as an example of this principle a proposed increase in the intervals between cable

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<sup>16</sup> NYS000154, Entergy Aug. 9, 2011 Response at Attachment 1, pages 1-2.

<sup>17</sup> Entergy miscites the testimony of Staff witnesses Duc Nguyen and Clifford Doult and its own witness Alan Cox for the proposition that all the "essential elements" of EN-DC-346 have been included in the UFSAR and are, therefore, binding and enforceable commitments. Entergy Proposed Findings at ¶ 117. Each of the three witnesses testified only that all the essential elements of the AMP are included in the USFAR, not EN-DC-346, the detailed Cable Reliability program implementing procedure. Alan Cox explicitly makes this distinction in the testimony cited by Entergy:

The essential elements of the program, as Mr. Nguyen and Mr. Doult have indicated are included in the FSAR supplement. The specific details of how we implement those elements are in this procedure [EN-DC-346].

Tr. 4074:24-4075:06.

<sup>18</sup> See State's Proposed Findings at ¶¶ 136-139.

insulation testing.<sup>19</sup> Because the six year testing interval in the AMP is explicitly incorporated in the UFSAR, Entergy would have to evaluate an increase in that interval under § 50.59 to determine whether a license amendment was needed for the change.<sup>20</sup>

Although Entergy could make such changes without informing the NRC, were Entergy to determine that none of the § 50.59 criteria were triggered, at the least NRC Staff would learn of these changes every two years in reports that Entergy is required to submit.

Because none of the details in EN-DC-346 are incorporated in the UFSAR or in LRA Commitment 15, there is no evidence in this record of any *legal* requirement that Entergy ever inform NRC staff of changes to the details of EN-DC-346. Although Entergy witnesses testified that Entergy “screens” changes to its implementing procedures to determine if a full § 50.59 evaluation is required,<sup>21</sup> this screening is required only by an internal Entergy procedure called a Process Applicability Determination (ENT000602). There is no evidence in the record that these screenings are required by regulation, and they are in themselves only part of an Entergy manual which is not enforceable by NRC.<sup>22</sup>

Because Entergy voluntarily “screens” changes to the Cable Reliability Program that are not incorporated in the UFSAR, Entergy could stop those voluntary screenings without violating any NRC regulation. Similarly, Entergy testified that it documents these “screens” and that those records are available to on-site NRC inspectors. Again, Entergy could stop voluntarily

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<sup>19</sup> Tr. 4076:24-4077:13 (Cox).

<sup>20</sup> *Id.*

<sup>21</sup> Tr. 3398:31-3400:03(Cox).

<sup>22</sup> Tr. 3650:10 - 3651:02; 3661:17-22 (Green). Alan Cox of Entergy testified that these internal procedures are “enforceable” to the extent that Entergy has to follow its own procedures. Tr. 3470:04-07, 23-25 (Cox). This circular testimony does not suggest, much less establish, that Entergy is required to have such screening procedures in the first instance pursuant to any NRC regulation.

documenting its voluntary screens. Moreover, documents that reside in Entergy's file cabinets are not available to the "host" state.

Entergy's voluntary screenings and voluntary documentation of those screenings cannot substitute for a legal requirement that such screenings be conducted and the results reported. Otherwise, Entergy could either stop "screening" changes to the details in EN-DC-346 that are not incorporated in the UFSAR or stop reporting them and then there would be no guarantee that NRC Staff would ever learn of changes to the Cable Reliability Program that were not evaluated under 10 C.F.R. § 50.59 because the details that were changed are not incorporated in the UFSAR.

## POINT II

### **THE ADEQUACY OF ENTERGY'S AGING MANAGEMENT PROGRAM FOR ABOVEGROUND NON-ENVIRONMENTALLY QUALIFIED CABLES AND CONNECTIONS IS NOT BEFORE THE BOARD; IF IT WERE, HOWEVER, IT DOES NOT PROVIDE REASONABLE ASSURANCE THAT ENTERGY WILL ADEQUATELY MANAGE THE AGING EFFECTS OF RADIATION, HEAT, AND MOISTURE ON ABOVEGROUND INACCESSIBLE CABLES**

Entergy's License Renewal Application ("LRA") contains a proposed AMP for aboveground non-environmentally qualified insulated cables and connections that are exposed to adverse localized environments caused by heat, radiation, and moisture.<sup>23</sup> An "adverse localized environment" is "significantly more severe than the specified service condition for the insulated cable or connection."<sup>24</sup> This proposed AMP is based on the guidance in GALL Rev. 1 and Rev. 2.<sup>25</sup>

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<sup>23</sup> LRA, Appendix B, B.1.25, Non-EQ Insulated Cables and Connections, at B-85.

<sup>24</sup> *Id.*

<sup>25</sup> NYS00146C, NUREG 1801, Rev. 1, Generic Aging Lessons Learned (GALL) Report (September 2005) ("GALL Rev. 1") at XI E-1; NYS00147D at XI E1-1.

Although New York’s testimony did not challenge the adequacy of this proposed AMP, Entergy nonetheless defended it in its Proposed Findings “for completeness of the record.”<sup>26</sup> Entergy claims that the Non-EQ Insulated Cables and Connections Program will adequately manage the effects of aging on both accessible and inaccessible aboveground cables that are exposed to adverse localized environments caused by heat, radiation, and moisture.<sup>27</sup> Should the Board take up this issue, it can only conclude that there is nothing in the record establishing any inspection procedure or corrective action criteria for aboveground *inaccessible* cables located in adverse localized environments.<sup>28</sup>

For example, Entergy’s Non-EQ Above Ground Cables and Connections AMP is a little more than one page long. The entire program description is set forth below:

A representative sample of *accessible* insulated cables and connections within the scope of license renewal will be visually inspected for cable and connection jacket surface anomalies such as embrittlement, discoloration, cracking or surface contamination. The technical basis for sampling will be determined using EPRI document TR-109619, “Guideline for the Management of Adverse Localized Equipment Environments.”<sup>29</sup>

The AMP contains no mention of inaccessible aboveground cables located in adverse localized environments.

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<sup>26</sup> Entergy Proposed Findings at ¶ 155; State Proposed Findings at ¶¶ 152, 153.

<sup>27</sup> Entergy Proposed Findings at Point IV(F) ¶¶ 154-158.

<sup>28</sup> Entergy’s corporate implementing programs for this AMP defines “accessible” and “inaccessible” cables as follows:

Accessible – Cables and connections that can be readily approached and easily viewed [Reference EPRI 1013475] (i.e. those that can be accessed without installing ladders or scaffolding). Cables and connections in enclosures such as cabinets, junction boxes, terminal boxes, condulets, etc., are considered inaccessible and are not included in this inspection.

ENT000241, EN-DC-348 Rev.2 at 7, § 3.1[1].

<sup>29</sup> LRA, Appendix B, B.1.2.5 at B-85-86 (emphasis added).

Nor does the consistency of Entergy's AMP with the guidance in GALL Rev. 1 or Rev. 2 establish that the aging effects on inaccessible aboveground cables will be adequately managed.<sup>30</sup> The inspection program in GALL Rev. 1 and Rev. 2 "applies to *accessible* electric cables and connections. . . that are installed in adverse localized environments caused by heat or radiation in the presence of oxygen."<sup>31</sup> There is only one mention of inaccessible aboveground cables in GALL Rev. 1 and Rev. 2 -- a suggestion that a determination should be made whether an unacceptable condition found in an accessible cable is applicable to inaccessible cables.<sup>32</sup> There is no guidance about making this determination or any program of inspections of or corrective actions to inaccessible cables. The consistency of Entergy's AMP with the guidance in GALL Rev. 1 and Rev. 2 does not provide reasonable assurance that it will manage the aging effects of inaccessible aboveground cables located in adverse localized environments because each version of the GALL is essentially silent about the aging management of those cables.<sup>33</sup>

Entergy's implementing procedures for this AMP<sup>34</sup> are also devoid of any content about monitoring the insulation condition of aboveground inaccessible cables or correcting problems

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<sup>30</sup> Entergy amended its Non-EQ Cables and Connection AMP to be consistent with GALL Rev. 2's requirement to visually inspect all accessible cables in adverse localized environments and not merely a representative sample of them. License Renewal Amendment 1 (Dec. 18, 2007) (ML073650195); Entergy's Pre-filed Testimony at 46- 47, A75, A76.

<sup>31</sup> NYS00146C at XI E-1; NYS00147D at XI E1-1.

<sup>32</sup> NYS00146C at XI E-1--XI E-2; NYS00147D at XI E1-1-XI E1-2.

<sup>33</sup> Although Entergy cites *Amergen Energy Co.* (Oyster Creek Nuclear Generating Station), 68 N.R.C. 461, 468 (2008) for the proposition that an applicant's use of an aging management plan identified in GALL can constitute reasonable assurance, the GALL Report is simply guidance and consistency with GALL does not foreclose a challenge to an AMP's adequacy. *Entergy Nuclear Vermont Yankee LLC and Entergy Nuclear Operations, Inc.* (Vermont Yankee Nuclear Power Station), 72 N.R.C. 1 (Jul. 8, 2010). Moreover, GALL is essentially silent about the aging management of *inaccessible* above aboveground cables.

<sup>34</sup> ENT000241, Non-EQ Insulated Cables and Connections Inspection, EN-DC-348 Rev. 2 (Jul. 5, 2011).

that might be found. The inspection procedure is limited to visual inspection of “*accessible* electrical cables and connections in close proximity to any” adverse localized equipment environment (“ALEE”) in order to “distinguish cables exhibiting significant aging effects (*i.e.*, deterioration) from those exhibiting little or no deterioration.”<sup>35</sup>

Although the implementing procedures contain the statement that “all cables affected by an ALEE, even those cables that may not be accessible for visual inspection, must be considered in the evaluation by the Program Coordinator,”<sup>36</sup> there is no explanation of whether these inaccessible aboveground cables located in ALEES are ever to be inspected, or how the Program Coordinator can “consider” them in the evaluation if they have not been inspected.

Although Entergy acknowledges the existence of aboveground inaccessible cables located in ALEES that may be degraded by radiation, heat, or moisture, neither its proposed AMP, nor its implementing procedures contain any plan to determine whether these cables have begun to deteriorate due to the adverse localized environment in which they are located. It appears that inaccessible aboveground cables are not included within the inspections described in EN-DC-348, which concerns aboveground accessible cables, or in EN-DC-346, which concerns underground cables.<sup>37</sup> Therefore, Entergy’s Non-EQ Above Ground Cables and Connections Program does not provide reasonable assurance that the aging effects of all aboveground cables located in ALEES will be adequately managed.

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<sup>35</sup> ENT000241 at 13, §5.1(1)(b).

<sup>36</sup> ENT000241 at 21, §5.8(2).

<sup>37</sup> State Proposed Findings at ¶¶ 156, 157.

## CONCLUSIONS OF LAW

1. For the foregoing reasons, Entergy's and NRC Staff's Proposed Findings of Fact and Conclusions of Law provide no basis for the Board to rule in their favor that Entergy's AMP for underground, non-EQ low- and medium-voltage power cables exposed to significant moisture will adequately manage the aging effects on those cables or provide reasonable assurance that the activities authorized by the renewed license will continue to be conducted in accordance with the current licensing basis for the period of extended operation.

2. Entergy has presented to the Board Entergy's proposed AMP for aboveground non-EQ Insulated Power Cables and Connections located in adverse localized environments. If the Board takes up this issue, the Board should determine that the record does not address this concern, and decline Entergy's invitation to find that the proposed AMP for Non-EQ Insulated Cables and Connections or EN-DC-348 will adequately address aging effects on aboveground inaccessible cables. Neither that proposed AMP nor EN-DC-348 provide reasonable assurance that the aging effects caused by heat, radiation, and moisture on aboveground inaccessible cables will be adequately managed or that the activities authorized by the renewed license will continue to be conducted in accordance with the current licensing basis for the period of extended operation.

***Signed (electronically) by***

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Dated: May 3, 2013

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