UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 9, 2014

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 – CORRECTION LETTER TO AMENDMENT NO. 273 RE: CONNECTION OF NON-SEISMIC BORIC ACID RECOVERY SYSTEM TO THE REFUELING WATER STORAGE TANK (TAC NO. MF1440)

Dear Sir or Madam:

By letter dated December 20, 2013 (Agencywide Document Access and Management System Accession No. ML13326A047), the Commission issued Amendment No. 273 to Facility Operating License No. DPR-26 for the Indian Point Nuclear Generating Unit No. 2. The amendment consisted of changes to the Technical Specifications (TSs) in response to your application dated April 15, 2013, as supplemented by letter dated September 4, 2013.

The amendment revised TS 3.5.4, "Refueling Water Storage Tank (RWST)," to allow for the temporary connection between the non-seismically qualified piping of the Boric Acid Recovery System to the seismically qualified piping of the RWST for the purpose of purifying the contents of the RWST in advance of the spring 2014 refueling outage. Operation in this mode will be under administrative controls and will only be applicable for limited periods through the end of the spring 2016 refueling outage.

Subsequent to issuing Amendment No. 273, your staff informed the Nuclear Regulatory Commission staff of an error on page 5 of the supporting safety evaluation. In a description of the system alignment between the RWST and the emergency core cooling system pumps, the safety evaluation stated that the charging pumps are automatically aligned to the RWST on a safety injection signal. Your staff pointed out that following a safety injection signal, the charging pumps are manually aligned to the RWST in accordance with emergency operating procedures. A corrected version of page 5 of the safety evaluation is enclosed.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,

Douglas V Pickett

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosure:
Corrected page 5 of the safety evaluation

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IN 97-78, "Crediting Operator Actions in Place of Automatic Actions and Modifications of Operator Actions, Including Response Times,"

3.0 TECHNICAL EVALUATION

The proposed change would revise TS 3.5.4, "Refueling Water Storage Tank (RWST)," such that the non-seismically qualified piping of the skid-mounted Boric Acid Recovery System (BARS) may be temporarily connected to the RWST seismic piping. Operation of the BARS from the RWST will be under administrative controls for a limited period of time (i.e., 30 days for RWST filtration prior to each fuel cycle). This change is only applicable until Refueling Outage R22 ends (spring 2016). The proposed change would add the following note to TS 3.5.4:

> The RWST isolation valves 350, 727A and 845 connected to non-safety related piping may be opened under administrative controls for up to 30 days per fuel cycle for filtration until the end of refuel outage 22.

This change supports recirculation of the contents of the RWST through the BARS during MODES 1 through 4 for the purpose of silica filtration. This safety evaluation addresses the systems review, the impact of the proposed change on planned operator actions to appropriately maneuver the plant during this configuration, and previously analyzed design basis accident radiological consequences.

3.1 Systems Review

During plant operation in Modes 1 through 4, the RWST is required to be operable to maintain a borated water supply for accident mitigation purposes. The RWST is aligned to the suction of the high head safety injection pumps, the residual heat removal pumps, and the containment spray pumps during normal operation in Modes 1 through 4. The suction of the charging pumps is manually aligned to the RWST in accordance with emergency operating procedures following a safety injection signal. During refueling operation in Modes 5 and 6, the RWST is required to be operable as a borated water supply should the boric acid storage system not be operable. The contents of the RWST are also used to flood the refueling cavity during refueling operations. The water in the RWST is borated to a concentration sufficient to ensure shutdown margin is maintained when the reactor is at cold shutdown conditions should RWST water be added to the reactor.

The BARS is a non-seismic skid-mounted unit that is temporarily connected to seismic designed piping for the purpose of removing silica that has accumulated from the gradual deterioration of Boraflex inserts in the Unit 2 spent fuel pool. System operation of the BARS is initiated by opening normally-closed 2-inch manual valves 845 and 727A that allows RWST water to flow from the 16-inch ECCS header to the refueling water purification pump. A temporary alignment permits the BARS to take suction from manual valve 725 which is located on the discharge side of the refueling water purification pump. The temporary alignment is created by removing the bonnet and internals from valve 725 and installing a hose adapter plate. The piping and manual valves 845, 727A, and 725 leading to the BARS suction line are all seismically designed. The BARS discharge line is connected to 2-inch manual valve 350 by temporarily removing a 2-inch flange and installing a hose adapter plate. Manual valve 350 is also seismically designed and leads directly back to the RWST.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,

/ra/

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
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