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John A Ventosa
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NL-14-099

August 18, 2014

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

SUBJECT: Request for Review of Entergy Seismic Hazard and Screening Report (CEUS Sites),
Response NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding
Recommendation 2.1 of the Near-Term Task Force Review of Insights from the
Fukushima Dai-ichi Accident
Indian Point Unit No. 3
Docket No. 50-286
License No. DPR-64

- REFERENCES:
- 1 NRC Letter, Screening and Prioritization Results Regarding Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Seismic Hazard Re-evaluations for Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated May 9, 2014 (ML14111A147)
 - 2 New York Power Authority letter to NRC, Individual Plant Examination of External Events (IPEEE), dated September 26, 1997 (ML11227A102)
 - 3 Entergy letter to NRC, Indian Point Nuclear Power Plant Units 2 and 3, Reassessment of the Seismic Core Damage Frequency, dated June 26, 2013 (ML13183A279 & ML13183A280)
 - 4 NRC Letter to Entergy, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (ML12073A348)
 - 5 Entergy letter to NRC, Entergy Seismic Hazard and Screening Report (CEUS Sites), Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 31, 2014 (ML14099A111)

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- 6 EPRI Report 1025287, Seismic Evaluation Guidance: Screening, Prioritization and Implementation Details (SPID) for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic (ML12333A170)
- 7 NRC Letter, Endorsement of Electric Power Research Institute Final Draft Report 1025287, "Seismic Evaluation Guidance", dated February 15, 2013

Dear Sir or Madam:

In Reference 1, NRC categorized IP3 as Screened In, Prioritization Group 1, Seismic Risk Evaluation required. Group 1 plants were requested to conduct a seismic risk evaluation and submit it by June 30, 2017. Entergy requests that the prioritization group for the additional IP3 Seismic Risk Evaluation be changed to "Priority Group 3." The requested evaluation requires specialized resources which have limited availability and Entergy has three plants categorized in Group 1 and one in Group 2. The re-categorization will allow the more appropriate focus of the limited resources available to perform a seismic risk evaluation on other Entergy plants which do not have IPEEE results which bound the reevaluated seismic hazard. Additionally, the Group 1 seismic risk evaluation for IP2 should provide insights concerning the seismic robustness of IP3.

In support of this request, Entergy notes the Indian Point Individual Plant Examination of External Events (IPEEE) was submitted to the NRC, reflected a conservative understanding of the Indian Point seismic risk (Reference 2). On June 26, 2013, Entergy submitted a Reassessment of the Seismic Core Damage Frequency (SCDF) for Indian Point Nuclear Power Plant Units 2 (IP2) and 3 (IP3) (Reference 3). The purpose of the reassessment was, in part, to determine a more realistic and accurate understanding of the Indian Point SCDF. The reassessment demonstrated that the SCDF for IP3 is significantly better than previous estimates in Reference 2. The reassessment additionally provided an updated tool for evaluating the safety implications of the reevaluated seismic hazards being developed in response to Reference 4.

As explained in Reference 5, Entergy determined that the reevaluated seismic hazard for IP3 is higher than the safe shutdown earthquake previously evaluated as part of the licensing of the plant. However, using the reassessed IPEEE of Reference 3, rather than IPEEE of Reference 2, and the guidance in Reference 6, Entergy further determined that the plant capacity is higher than the new reevaluated hazard. The IPEEE and its reassessment were reviewed for adequacy utilizing the guidance provided in Section 3.3 of Reference 6.

In Reference 1, NRC categorized IP3 as Screened In, Prioritization Group 1, Seismic Risk Evaluation required. Group 1 plants were requested to conduct a seismic risk evaluation and submit it by June 30, 2017. As discussed in Reference 5, based on the results of Entergy's IPEEE screening reevaluation, IP3 screens-out of performing another risk evaluation using the criteria of Reference 6. The screening reevaluation was performed using the updated IPEEE HCLPF Spectrum (IHS) (Reference 3) submitted to the NRC in June, 2013. As noted in Reference 5, Entergy believes that a comparison to the updated IHS (Reference 3) is more appropriate than a comparison to the original IPEEE analysis (Reference 2) for the screening. This letter requests the NRC review the analyses submitted in Reference 3 and 5, and revisit its prioritization determination

contained in Reference 1. Since the seismic risk evaluation has already been submitted, such a review should provide confidence in the IP3 seismic robustness earlier than otherwise would be obtained in following the 2017 schedule for performance and submittal of another risk evaluation. This request does not affect the December 2014 Expedited Seismic Evaluation Process submittal planned for IP3. Additionally, the Group 1 seismic risk evaluation for IP2 should provide insights concerning the seismic robustness of IP3.

If you have any questions or require additional information, please contact Robert Walpole, Regulatory Assurance Manager, at (914) 254-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 18, 2014.

Sincerely,

A handwritten signature in black ink, appearing to read "JAV" with a stylized flourish.

JAV/sp

cc: Mr. Douglas V. Pickett, Senior Project Manager, NRC NRR DORL
Mr. William M. Dean, Regional Administrator, NRC Region I
NRC Resident Inspectors Office
Mr. John B. Rhodes, President and CEO, NYSERDA
Ms. Bridget Frymire, New York State Dept. of Public Service