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NL-15-058

April 21, 2015

U.S. Nuclear Regulatory Commission  
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Rockville, MD 20852-2738

**SUBJECT:** Response to Request for Additional Information on Expedited Seismic Evaluation Process Report Regarding Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident  
Indian Point Unit Numbers 2 and 3  
Docket Nos. 50-247 and 50-286  
License Nos. DPR-26 and 64

**REFERENCES:**

1. NRC E-mail from Stephen Wyman, NRC NRR, to Entergy, Richard Drake, Regarding a Request for Information on the Expedited Seismic Evaluation Process Report, April 9, 2015
2. Entergy Letter NL-14-152 Regarding Entergy's Expedited Seismic Evaluation Process 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 December 22, 2014
3. NRC Letter, 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 (Accession No. ML12053A340)
4. NRC Letter, Electric Power Research Institute Report XXXXXX, "Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic," as an Acceptable Alternative to the March 12, 2012, Information Request for Seismic Reevaluations, dated May 7, 2013, (Accession No. ML13106A331)

Dear Sir / Madam:

The purpose of this letter is to respond to an NRC E mail (Reference 1) requesting additional information to support review of the expedited seismic evaluation process report submitted in

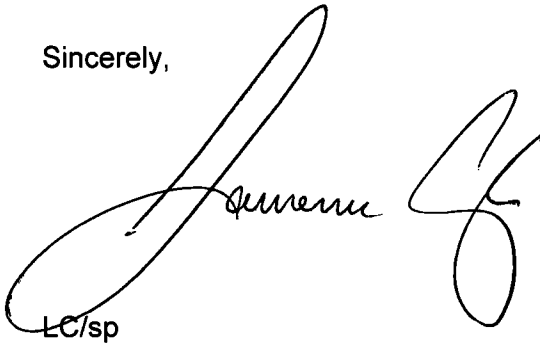
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Reference 2. The expedited seismic evaluation process report was submitted in response to the Reference 3 request to provide interim evaluations and actions taken or planned to address the higher seismic hazard relative to the design basis, as appropriate, prior to completion of the risk evaluation. The expedited seismic evaluation process was prepared in accordance with the NRC endorsed guidance in Reference 4.

This letter contains no new regulatory commitments. If you have any questions please contact Mr. Robert Walpole, Manager, Regulatory Assurance at (914) 254-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 21, 2015

Sincerely,



LC/sp

Attachment: Response to RAI on the Expedited Seismic Evaluation Process Report

cc: Mr. Douglas Pickett, Senior Project Manager, NRC NRR DORL  
Mr. John Boska, Senior Project Manager, NRC NRR DJLL  
Mr. Daniel H. Dorman, Regional Administrator, NRC Region 1  
NRC Resident Inspector  
Mr. John B. Rhodes, President and CEO, NYSERDA  
Ms. Bridget Frymire, New York State Dept. of Public Service

ATTACHMENT TO NL-15-058

RESPONSE TO RAI ON THE EXPEDITED SEISMIC  
EVALUATION PROCESS REPORT

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

**Request for Additional Information Regarding  
the Seismic Evaluation Process Report**

The NRC requested additional information regarding the Seismic Evaluation Process Report by E mail of April 9, 2015. The following are the questions and responses:

**Question 1**

Please clarify whether any ESEL item is located at an elevation greater than 40 ft. above grade. Please discuss the method used for screening items at elevations beyond 40 ft above grade and provide the criteria and appropriate reference to the guidance used to evaluate ESEL items located at elevations greater than 40 ft. above grade.

**Response**

The Indian Point Unit 2 Expedited Seismic Equipment List (ESEL), excluding inaccessible components, contains eight components located more than 40 ft above grade (above elevation 58.5 ft in the Auxiliary Feedwater Pump Building). The eight components consist of four steam generator relief valves and four steam generator atmospheric dump valves all located at elevation 80'. Similarly at Unit 3, four steam generator safety relief valves and four steam generator atmospheric steam relief valves are located more than 40 ft. above grade in the Auxiliary Feed Pump Building. These components were evaluated and determined to be rugged by the seismic review team (SRT) during plant seismic walkdowns.

**Question 2**

The ESEP report states that the vertical direction RLGM ISRS is obtained by scaling the vertical amplified ground response spectrum, but does not indicate the scaling factor used. Please clarify the scaling factor used.

**Response**

In accordance with section I.8.2 of IP-RPT-04-00481, Both IP2 and IP3 vertical response In-structure response spectra (ISRS) is calculated as two thirds of the horizontal in-structure floor response. Thus, the horizontal scale factor of 2 is also applicable to vertical response for the review level ground motion (RLGM).

**Question 3**

Please clarify why, for Unit 3, Section 6.6 states that the evaluated ESEL components were determined to have adequate capacity for the design basis loads based on the high confidence, low probability of failure (HCLPF) calculations (i.e., HCLPF capacities are greater than the RLGM), while Section 8.2 identifies modifications required for the Fire Water Storage Tank anchorage because their HCLPF is below the RLGM.

## Response

The conclusion contained in section 6.6 for Unit 3 incorrectly excludes the two fire water storage tanks that require modifications in order for HCLPF capacity to exceed RLGM demand. Section 6.6 does refer to attachment B which does correctly identify the current HCLPF and modification is required. The final conclusion in section 8.2 also is correct and site CR-IP3-2015-00061 exists to track the modifications.

Please note that the response to 3 is not consistent with the text within the ESEP report provided by Entergy and its vendor. A vendor CR 2015-3376 and Site CR-IP3-2015- 2612 have been initiated in the corrective action programs to address this issue.