



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

May 6, 2015

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 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT TO
PERMANENTLY EXTEND THE FREQUENCY OF THE CONTAINMENT
INTEGRATED LEAK RATE TEST (TAC NO. MF5382)**

Dear Sir or Madam:

By letter dated December 9, 2014, Entergy Nuclear Operations, Inc. (the licensee), submitted a license amendment request to permanently extend the frequency of the containment integrated leak rate test for Indian Point Nuclear Generating Unit No. 2 from once every 10 years to once every 15 years.

The U.S. Nuclear Regulatory Commission staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). Based on our discussions we understand that a response to the RAI will be provided within 30 days of the date of this letter.

Please contact me at (301) 415-1364 if you have any questions on this issue.

Sincerely,

A handwritten signature in black ink, which appears to read "Douglas V. Pickett", is written above the typed name.

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:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
EXTENSION OF THE CONTAINMENT INTEGRATED LEAK RATE TEST
ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247

Probabilistic Risk Assessment Licensing Branch Question 1

Nuclear Energy Institute (NEI) 94-01, Revision 2-A (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100620847), "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," states that plant-specific confirmatory analyses are required when extending the Type A integrated leak rate test (ILRT) interval beyond ten years and that the assessment should be performed using the approach and methodology described in Electric Power Research Institute (EPRI) Technical Report (TR) 1009325, Revision 2-A¹, "Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals" (ADAMS Accession No. ML14024A045).

EPRI TR 1009325, Revision 2-A, does not address plant-specific probabilistic risk assessment (PRA) quality. In the U.S. Nuclear Regulatory Commission (NRC) safety evaluation, dated June 25, 2008 (ADAMS Accession No. ML081140105), the NRC staff stated, in part, that:

Licensee requests for a permanent extension of the ILRT surveillance interval to 15 years pursuant to NEI TR 94-01, Revision 2, and EPRI Report No. 1009325, Revision 2, will be treated by NRC staff as risk-informed license amendment requests. Consistent with information provided to industry in Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," the NRC staff will expect the licensee's supporting Level 1/[large early release frequency] LERF PRA to address the technical adequacy requirements of [Regulatory Guide] RG 1.200, Revision 1... Any identified deficiencies in addressing this standard shall be assessed further in order to determine any impacts on any proposed decreases to surveillance frequencies. If further revisions to RG 1.200 are issued which endorse additional standards, the NRC staff will evaluate any application referencing NEI TR 94-01, Revision 2, and EPRI Report No. 1009325, Revision 2, to examine if it meets the PRA quality guidance per the RG 1.200 implementation schedule identified by the NRC staff.

According to Regulatory Issue Summary 2007-06, the NRC staff expects that licensees fully address all scope elements with Revision 2 of RG 1.200 (ADAMS Accession No. ML090410014) by the end of its implementation period (i.e., one year after the issuance of Revision 2). RG 1.200, Revision 2, endorses, with exceptions and clarifications, the combined American Society of Mechanical Engineers (ASME)/American Nuclear Society (ANS) PRA standard (ASME/ANS RA-Sa-2009).

¹ EPRI TR-1009325, Revision 2-A, is also identified as EPRI TR-1018243.

Enclosure

In the application dated December 9, 2014 (ADAMS Accession No. ML14353A015), the licensee stated that "An internal comparison of the ASME standard to the combined ASME/ANS standard confirmed that there were few substantive changes to the internal events portion of the standard, although the expected level of documentation was increased in some cases." However, based on this statement alone, it is unclear if a full gap assessment (i.e., for each of the supporting requirements) was performed for the Indian Point Nuclear Generating Unit No. 2 (IP2) internal events PRA model to the latest endorsed version of the PRA standard.

Given that the implementation date of RG 1.200, Revision 2, was April 2010 and the license amendment request application was submitted in December 2014, identify and address any gaps between the IP2 PRA model used in this application and the RG 1.200, Revision 2, requirements that are relevant to this submittal; or explain why addressing the requirements would have no impact on this application.

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/RA/

Douglas V. Pickett, Senior Project Manager
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ADAMS Accession No.: ML15125A097

OFFICE	DORL/LPLI-1/PM	DORL/LPLI-1/LA	APLA/BC	DORL/LPLI-1/BC (A)
NAME	DPickett	KGoldstein	HHamzehee by memo dated	MDudek
DATE	05/06/2015	05/05/2015	04/23/2015	05/06/2015

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