



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

ERIC T. SCHNEIDERMAN  
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE  
ENVIRONMENTAL PROTECTION BUREAU

June 9, 2015

Lawrence G. McDade, Chair  
Richard E. Wardwell, Administrative Judge  
Michael F. Kennedy, Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Mailstop 3 F23  
Two White Flint North  
11545 Rockville Pike  
Rockville, MD 20852-2738

Re: Indian Point Nuclear Generating Station, Unit 2 and Unit 3  
Docket Nos. 50-247-LR/50-286-LR; ASLBP No. 07-858-03-LR-BD01

Dear Administrative Judges:

Intervenor State of New York will serve today Exhibits NYS000481 through NYS000528 (as indicated on the attached Table of Exhibits) relative to Contention NYS-25. Certain exhibits, indicated as “non-public” or “proprietary” in the attached exhibit list, will be served via the EIE’s non-public submission portal. Certificates of service will follow.

If there is any difficulty in opening the submissions or other questions about the filing, please contact me.

Respectfully submitted,

*Signed (electronically) by*

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Copies to: EIE service list

Submitted: June 9, 2015

Entergy Nuclear Operations, Inc. (Indian Point Units 2 and 3),  
Docket Nos. 50-247-LR and 50-286-LR, ASLBP No. 07-858-03-LR-BD01

Evidentiary Hearing

State of New York ("NYS") Hearing Exhibits

NYS Exhibit #	Contentions Addressed by Exhibit	Exhibit Name	Exhibit Submission / Revision Date
NYS000481	NYS-25	Revised Statement of Position of the State of New York in support of Contention NYS-25 (Public, Redacted) (June 9, 2015)	6/9/2015
NYS000481	NYS-25	Revised Statement of Position of the State of New York in support of Contention NYS-25 (Non-Public, Non-Redacted) (June 9, 2015)	6/9/2015
NYS000482	NYS-25	Revised Pre-filed Written Testimony of Richard T. Lahey, Jr. in support of Contention NYS-25 (Public, Redacted) (June 2, 2015)	6/9/2015
NYS000482	NYS-25	Revised Pre-filed Written Testimony of Richard T. Lahey, Jr. in support of Contention NYS-25 (Non-Public, Non-Redacted) (June 2, 2015)	6/9/2015
NYS000483	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Declaration of Richard T. Lahey, Jr. in Support of Contention NYS-25 and Joint Contention NYS-38/RK-TC-5(Feb. 12, 2015)(Public, Redacted) (ML15044A492)	6/9/2015
NYS000483	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Declaration of Richard T. Lahey, Jr. in Support of Contention NYS-25 and Joint Contention NYS-38/RK-TC-5(Feb. 12, 2015)(Non-Public, Non-Redacted) (ML15044A510)	6/9/2015

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NYS00484A-B	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NUREG/CR-7153, Vol. 2, Expanded Materials Degradation Assessment (EMDA), Aging of Core Internals and Piping Systems (October 2014) (ML14279A331)	6/9/2015
NYS000485	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	DOE, Office of Nuclear Energy, Light Water Reactor Sustainability Program: Materials Aging and Degradation Pathway Technical Program Plan, ORN/LTR-2012/327, Rev. 1 (August 2014), available at <a href="https://inlportal.inl.gov/portal/server.pt/community/lwrs_program/442/program_documents">https://inlportal.inl.gov/portal/server.pt/community/lwrs_program/442/program_documents</a>	6/9/2015
NYS000486	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Stevens, Gary L., Presentation to ACRS on Technical Brief on Regulatory Guidance for Evaluating the Effects of Light Water Reactor Coolant Environments in Fatigue Analyses of Metal Components (December 2, 2014) (ML14351A368)	6/9/2015
NYS000487	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NUREG/CR-7027 (ANL-10-11), Degradation of LWR Core Internal Materials due to Neutron Irradiation (December 2010) (ML102790482)	6/9/2015

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NYS00488A-B	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NUREG/CR-7184 (ANL-12/56), Chen, et al., Crack Growth Rate and Fracture Toughness Tests on Irradiated Cast Stainless Steels (Revised December 2014) (ML14356A136)	6/9/2015
NYS000489	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Slides, EPRI, Industry-NRC Meeting, CASS Screening Criteria for Thermal and Irradiation Embrittlement for BWR and PWR Internals (July 15, 2014) (ML14211A661)	6/9/2015
NYS000490	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NUREG/CR-6909, Rev. 1, ANL-12/60, Office of Nuclear Regulatory Research, Effect of LWR Coolant Environments on the Fatigue Life of Reactor Materials, Draft Report for Comment (March 2014) (ML14087A068)	6/9/2015
NYS000491	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Stevens, Gary L., et al., Observations and Recommendations for Further Research Regarding Environmentally Assisted Fatigue Evaluation Methods, 40th MPA-Seminar, Materials Testing Institute, University of Stuttgart, Stuttgart, Germany (October 6-7, 2014) (ML14258A039)	6/9/2015

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NYS000492	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Transcript of Briefing on Subsequent License Renewal to NRC Commissioners (May 8, 2014), available at <a href="http://www.nrc.gov/reading-rm/doc-collections/commission/tr/2014/20140508.pdf">http://www.nrc.gov/reading-rm/doc-collections/commission/tr/2014/20140508.pdf</a>	6/9/2015
NYS000493	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Chopra, Omesh, Public Comment on NRC-2010-0180-0001, Availability of Draft NUREG-1800, Revision 2 and Draft NUREG-1801, Revision 2 (June 9, 2010) (ML101660084)	6/9/2015
NYS000494	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	U.S. NRC Regulatory Issue Summary 2014-11: Information on Licensing Application for Fracture Toughness Requirements for Ferritic Reactor Coolant Pressure Boundary Components (October 14, 2014) (ML14149A165)	6/9/2015
NYS000495	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Slides, "Irradiation Assisted Degradation of LWR Core Internal Materials: Brief Review," Presentation by Appajosula S. Rao, U.S. Nuclear Regulatory Commission, Office of Nuclear Regulatory Research, (April 14, 2015) (ML15103A129)	6/9/2015

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NYS000496	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, License Renewal Application - Revised Reactor Vessel Internals Program and Inspection Plan, NL-12-037 (February 17, 2012) (ML12060A312)	6/9/2015
NYS000497	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-12-089 (June 14, 2012)(Exhibit NRC000153) (Exhibit ENT000554) (ML12167A008)	6/9/2015
NYS000498	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, License Renewal Application - Revised Reactor Vessel Internals Program and Inspection Plan, NL-12-134 (September 28, 2012) (ML12285A232)	6/9/2015
NYS000499	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-12-140 (October 17, 2012) (ML12300A391)	6/9/2015

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NYS000500	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-12-166 (November 20, 2012) [Non-proprietary version] (ML12352A095)	6/9/2015
NYS000501	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-13-052 (May 7, 2013) (ML13142A202)	6/9/2015
NYS000502	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-13-122 (September 27, 2013) (ML13270A250)	6/9/2015
NYS000503	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-14-013 (January 28, 2014) (ML14038A150)	6/9/2015

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NYS000504	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-14-067 (June 9, 2014) (ML14176A159)	6/9/2015
NYS000505	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-14-093 (August 5, 2014) (ML14225A777)	6/9/2015
NYS000506	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Dacimo, Fred, Entergy, letter to Document Control Desk, USNRC, Reply to Request for Additional Information Regarding the License Renewal Application, NL-14-117 (September 8, 2014) (ML14267A270)	6/9/2015
NYS000507	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NUREG-1930, Safety Evaluation Report Related to the License Renewal of Indian Point Nuclear Generating Unit Nos. 2 and 3, Supplement 2 (November 2014) (ML14310A803)	6/9/2015



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NYS000508	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Tregoning, R.L., Reasons for Non-concurrence on Draft Safety Evaluation for the EPRI Topical Report (TR) Materials Reliability Program (MRP) Report 1016596 (MRP-227), Revision 0, Pressurized Water Reactor (PWR) Internals Inspection and Evaluation Guidelines (March 22, 2011) (ML110770169)	6/9/2015
NYS000509	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Case, Michael J., Comments for the Document Sponsor to Consider Pertaining to Non-Concurrence on Draft Safety Evaluation for the EPRI Topical Report (TR) Materials Reliability Program (MRP) Report 1016596 (MRP-227), Revision 0, Pressurized Water Reactor (PWR) Internals Inspection and Evaluation Guidelines, RES/DE (March 22, 2011) (ML110810787)	6/9/2015
NYS000510	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Westinghouse Propriety Report, Class-2, Indian Point Unit 2 and Unit 3 EAF Screening Evaluations, CN-PAFM-12-35, Rev. 1 (Nov. 2012) (IPECPROP00072778) [PROPRIETARY]	6/9/2015

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NYS000511	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Westinghouse, Indian Point Unit 2 (IP2) and Unit 3 (IP3) Refined EAF Analyses and EAF Screening Evaluations, Phase 2, Rev. 1, CN-PAFM-13-32 (2013) (IPECPROP00078338) [PROPRIETARY]	6/9/2015
NYS000512	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Westinghouse Propriety Report, Class-2, Indian Point Unit 2 Pressurizer Spray Model Transfer Function Data Base Development and Environmental Fatigue Evaluations, CN-PAFM-13-40 (2013) (IPECPROP00079751) [PROPRIETARY]	6/9/2015
NYS000513	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Kupper, C.T. and Gray, M.A., Westinghouse, License Renewal Environmental Fatigue Screening Application, Paper No. PVP2014-29093, Proceedings of the ASME 2014 Pressure Vessels & Piping Conference, Anaheim, California (July 20-24, 2014) [Full-Text Copyrighted]	6/9/2015
NYS000514	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Kline, S. J. and McClintock, F. A., "Describing Uncertainties in Single-Sample Experiments," J. Mech. Eng. (January 1953) [Full-Text Copyrighted]	6/9/2015

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NYS000515	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	U.S. NRC Inspection Report with notices of non-conformance for Westinghouse's Quality Assurance Program (April 24, 2015) (ML15070A213)	6/9/2015
NYS000516	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Troyer, Greg and Devan, Matthew, An Assessment of Branch Technical Position 5-3 to Determine Unirradiated RTNDT for SA-508 Cl.2 Forgings, Paper No. PVP2014-28897, Proceedings of the ASME 2014 Pressure Vessels and Piping Conference, Anaheim, California (July 20-24, 2014) [Full-Text Copyrighted]	6/9/2015
NYS000517	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Salas, Pedro, Regulatory Affairs Director, AREVA, Letter to USNRC regarding Potential Non-Conservatism in NRC Branch Technical Position 5-3 (January 30, 2014) (ML14038A265)	6/9/2015
NYS000518	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Kirk, Mark and Sheng, Simon, USNRC, Assessment of BTP 5-3 Protocols to Estimate RTNDT(u) and USE, (June 4, 2014) (ML14163A524)	6/9/2015

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NYS000519	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Pressurized Water Reactor Owners Group, BTP 5-3 Industry Issue, Executive Review (October 28, 2014) (IPECPROP00081155) [PROPRIETARY]	6/9/2015
NYS000520	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Kirk, M. et al., "Assessment of Fracture Toughness Models for Ferritic Steels Used in Section XI of the ASME Code Relative to Current Data-Based Model," PVP2014-28540, Proceedings of PVP2014, 2014 ASME Pressure Vessels and Piping Division Conference, Anaheim, CA (July 20-24, 2014) (ML14086A183)	6/9/2015
NYS000521	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NUREG-0800, Rev. 2, Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants, LWR Edition, Branch Technical Position 5-3, Excerpted: pp. BTP-5-3-1 - BTP-5-3-8 (March 2007) (ML070850035)	6/9/2015
NYS000522	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Federal Register, 79 Fed. Reg. 69,884, Guidelines for Evaluating the Effects of Light-Water Reactor Coolant Environments in Fatigue Analyses of Metal Components [NRC-2014-0244] (November 24, 2014)	6/9/2015

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NYS000523	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NRC, Draft Regulatory Guide DG-1309 (Proposed Revision 1 of Regulatory Guide 1.207, dated March 2007), Guidelines for Evaluating the Effects of Light-Water Reactor Coolant Environments in Fatigue Analyses of Metal Components (November 2014) (ML14171A584)	6/9/2015
NYS000524	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	NRC, Draft License Renewal Interim Staff Guidance, LR-ISG-2011-04, Updated Aging Management Criteria for PWR Reactor Vessel Internal Components (March 13, 2012) (ML12004A149)	6/9/2015
NYS000525	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Westinghouse, Indian Point Unit 2 - Reactor Internals Upport Support Assembly Fatigue Assessment for Use in Environmental Assisted Fatigue Calculations, Rev. 0, CN-RIDA-13-57 (2013) (IPECPROP00079572) [PROPRIETARY]	6/9/2015
NYS000526	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	Transcript, Advisory Committee on Reactor Safeguards, Plat License Renewal Subcommittee with Presentation Slides (April 23, 2015) (ML15133A270)	6/9/2015

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NYS000527	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	IP-RPT-11-LRD13, Entergy Nuclear Management Manual EN-DC-149, Review of the Fatigue Monitoring Aging Management Program for License Renewal Implementation (November 13, 2012) (IPEC00268373)	6/9/2015
NYS000528	NYS-25, NYS-26B/RK-TC-1B, NYS-38/RK-TC-5	USNRC Near-term Task Force Recommendation 2.1 Seismic Hazard Evaluation (June 19, 2014)(ML14169A489)	6/9/2015