



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

July 7, 2015

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE
RENEWAL APPLICATION, SET 2015-02 (TAC NOS. MD5407 AND MD5408)

Dear Sir or Madam:

By letter dated April 23, 2007, as supplemented by letters dated May 3, 2007, and June 21, 2007, Entergy Nuclear Operations, Inc. (Entergy) submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 to renew the operating licenses for Indian Point Nuclear Generating Unit Nos. 2 and 3 to the U.S. Nuclear Regulatory Commission (NRC). The NRC staff documented its findings in the Safety Evaluation Report (SER) related to the license renewal of Indian Point Nuclear Generating Unit Nos. 2 and 3, which was issued August 11, 2009 and supplemented August 30, 2011 (SER Supplement 1), and November 6, 2014 (SER Supplement 2).

Subsequent to the issuance of SER Supplement 1, the staff identified additional operating experience at several nuclear power plants regarding loss of coating integrity of internal coatings. To address this operating experience, on November 14, 2014, the NRC staff issued interim staff guidance document LR-ISG-2013-01, "Aging Management of Loss of Coating or Lining Integrity for Internal Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks."

By letters dated April 1, 2014 and December 2, 2014, the NRC staff requested additional information as to how Entergy planned to manage the effects of aging as described in LR-ISG-2013-01. By letter dated March 10, 2015, Entergy responded to the NRC staff's request for additional information (RAI). Based on its review of the information contained in Entergy's letter, the NRC staff RAIs are as described in the enclosure.

This RAI was discussed with Mr. Richard Louie, and a mutually agreeable date for Entergy's response is within 60 days from the date of this letter.

- 2-

If you have any questions, please contact me at 301-415-6459, or by e-mail at michael.wentzel@nrc.gov.

Sincerely,

/RA/

Michael Wentzel, Project Manager
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:
As stated

cc w/encl: Listserv

- 2-

If you have any questions, please contact me at 301-415-6459, or by email at michael.wentzel@nrc.gov.

Sincerely,

/RA/

Michael Wentzel, Project Manager
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:
As stated

cc: Listserv

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ADAMS Accession No.: ML15170A456

*concurred via email

OFFICE	LA:DLR	PM: DLR/RPB2	BC:DLR/RPB1	PM: DLR/RPB2
NAME	IBetts	MWentzel	YDiaz-Sanabria	MWentzel
DATE	6/22/15	7/6/15	7/6/15	7/7/15

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RENEWAL APPLICATION, SET 2015-02 (TAC NOS. MD5407 AND MD5408)

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REQUEST FOR ADDITIONAL INFORMATION, SET 2015-02
RELATED TO INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
LICENSE RENEWAL APPLICATION
DOCKET NOS. 50-247 AND 50-286
REGARDING LR-ISG-2013-01

RAI 3.0.3-16

Background

As amended by letter dated March 10, 2015, license renewal application (LRA)

Table 3.3.2-19-43-IP3, "Pressurizer System," states that loss of coating integrity is managed for metal components with internal coating in a "treated borated water > 140°F" environment by the Coating Integrity Program.

Issue

Environments with high temperatures are not evaluated to be bounding within the assumptions of Generic Aging Lessons Learned (GALL) aging management program (AMP) XI.M42, "Aging Management of Loss of Coating or Lining Integrity for Internal Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks." The changes to the LRA do not state the specific coating material used in systems with temperatures exceeding 140°F. Therefore, the staff lacks sufficient information to conclude that the guidance in AMP XI.M42 (e.g., inspection intervals, acceptance criteria) is sufficient for the materials exposed to temperatures greater than 140°F.

Request

State the coating materials exposed to temperatures greater than 140°F. Provide the basis for concluding that loss of coating integrity is adequately managed in the subject environment.

RAI 3.0.3-17

Background

As amended by letter dated March 10, 2015, LRA Sections A.2.1.42, A.3.1.42, and B.1.43, "Coating Integrity," state that the Coating Integrity Program will be implemented by December 31, 2024. In addition, Commitment 8, as revised, states that LRA Sections A.2.1.13, A.3.1.13 and B.1.14, "Fire Water System," will be implemented by December 31, 2019.

Issue

The implementation schedule for LRA Section B.1.43 ranges up to nine years, from 2015 to 2024. In addition, implementation of Commitment 8, as revised, ranges from 2015 to 2019. Standard Review Plan for License Renewal (SRP-LR) Table 3.0-1 for AMP XI.M42 states that the first inspections of internal coatings should be completed no later than the last refueling outage prior to the period of extended operation. The staff recognizes that Indian Point Generating Unit No. 2 has entered timely renewal and Indian Point Generating Unit No. 3 may shortly enter timely renewal. As such, it does not appear that the inspection section schedule recommended in Table 3.0-1 will be met. Further, it is not clear to the staff how loss of coating integrity will be managed in the time frame prior to the programs being implemented.

ENCLOSURE

Request

State how loss of coating integrity will be managed between now and the proposed implementation dates and the basis for concluding that coating integrity will be adequately managed in this time period.