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Lawrence Coyle  
Site Vice President

NL-15-083

June 29, 2015

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

SUBJECT: Response to Request for Additional Information Regarding License  
Amendment to Permanently Extend the Frequency of the Containment  
Integrated Leak Rate Test (TAC NO. MF3369)  
Indian Point Unit Number 2  
Docket No. 50-247  
License No. DPR-26

REFERENCES: 1. NRC Letter to Entergy, Request for Additional Information Regarding the  
Proposed License Amendment to Permanently Extend the Containment  
Type A Leak Rate Test Frequency to 15 years (TAC NO. MF5382),  
dated June 16, 2015.

2. Entergy Letter NL-14-128 to NRC Regarding Proposed License  
Amendment Regarding Extending the Containment Type A Leak Rate  
Testing Frequency to 15 years, dated December 9, 2014  
(ML14353A015).

3. Entergy Letter NL-15-062 to NRC regarding the Response to Request  
for Additional Information Regarding Extending the Containment Type A  
Leak Rate Testing Frequency to 15 Years, dated May 20, 2015  
(ADAMS Accession No. ML15149A139)

Dear Sir or Madam:

Entergy Nuclear Operations, Inc., (Entergy) is hereby providing a response to the NRC request for additional information, Reference 1, associated with the proposed changes to the Indian Point 2 Technical Specifications (TS) in Reference 2 and a prior response in Reference 3. The response to the request for additional information is provided in the Attachment.

No new Regulatory Commitment is made in this submittal.

A017  
NRR

A copy of this response and the associated Attachments is being submitted to the designated New York State official in accordance with 10 CFR 50.91.

If you have any questions or require additional information, 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 June 29, 2015.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of loops and a final flourish.

LC/sp

Attachment: Response to Request for Additional Information Regarding the Extension of the Containment Type A Leak Rate Testing Frequency to 15 years

cc: Mr. Douglas Pickett, Senior Project Manager, NRC NRR DORL  
Mr. Daniel H. Dorman, Regional Administrator, NRC Region 1  
NRC Resident Inspectors Office  
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA  
Ms. Bridget Frymire, New York State Dept. of Public Service

ATTACHMENT TO NL-15-083

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING THE EXTENSION OF THE CONTAINMENT  
TYPE A LEAK RATE TESTING FREQUENCY TO 15 YEARS

ENTERGY NUCLEAR OPERATIONS, INC.  
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2  
DOCKET NO. 50-247

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING THE EXTENSION  
OF THE CONTAINMENT TYPE A LEAK RATE TESTING FREQUENCY TO 15 Years**

In order for the NRC staff to complete their review of the Entergy request for Technical Specification Amendment to extend the Containment Type A leak test, the NRC Mechanical and Civil Engineering Branch (EMCB) has requested additional information to supplement cover letter References 1 (Entergy Letter NL-14-128) and 2 (Entergy Letter NL-15-062) Regarding Proposed License Amendment Regarding Extending the Containment Type A Leak Rate Testing Frequency to 15 years. The RAI and Entergy's response follow:

**Mechanical and Civil Engineering Branch (EMCB)**

In Reference 2, the response to EMCB RAI-4 notes that the inaccessible portions of the liner are protected from the containment environment by the moisture resistant insulation which ensures the inaccessible portions of the liner remain acceptable. Section 4.4.1 of Reference 1 notes that in 2008, multiple loose insulation panels were identified, with two of the panels requiring repair. No discussion is provided about the liner behind the insulation panels or inspections done to verify no moisture had migrated behind the loose panels.

Describe what actions were taken to verify no degradation occurred behind the insulation panels. If visual inspections were not conducted on the liner behind the loose insulation panels, provide a justification for why they were unnecessary.

**Response**

In 2008, several portions of the liner insulation panels had the stainless steel jacket curled up from the seam between adjacent panels. Two of the insulation panels were in areas that could be susceptible to spray from adjacent lines should they fail and were repaired. While performing the repairs there were no indications, i.e. moisture or rust staining, on the stainless steel jacketing or insulation components that would be indicative of ongoing degradation behind the liner insulation panels. Due to asbestos concerns and no visual indications of liner issues, the insulation was not removed prior to the repair. It should be noted that all of the areas where the liner jacket was observed to be peeled off but still attached to the insulation, the insulation was significantly above the 46' floor elevation, therefore not a vulnerable area for moisture to get behind the liner.

Past liner inspections have been performed prior to and after 2008. During the Unit 2 refueling outage in 2000, it was discovered that some of the caulking at the intersection of the stainless steel liner jacket and the 46' floor was degraded which provided a potential path for water to get to the liner should an event occur that would cause water to pond at these locations. There were also indications, rust staining, at these locations to indicate there could be degradation of the liner behind the panels. As a result, the insulation was removed at 12 locations around the periphery of the containment at the intersection of the liner and the 46' floor elevation and the liner examined in accordance with IWE requirements. Some corrosion was found at the areas where the caulking was degraded but NDE results showed that the liner thickness in all areas was greater than the required minimum thickness. Per the IWE requirements, inspections at these locations were performed for 3 successive outages with no additional degradation found. In addition, per License Renewal commitments, a section of the liner insulation at 68' elevation was removed and inspected

in March of 2012. The liner was found to be in good condition and NDE results showed the thickness to be within fabrication tolerances.

Based on the inspections performed in 2000 and there being no indications of liner degradation in 2008 at the areas of the liner insulation jacket issues, it was determined that direct visual examination of the liner in 2008 was not required.