



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

July 22, 2015

LICENSEE: Entergy Nuclear Operations, Inc.

FACILITY: Indian Point Nuclear Generating Unit Nos. 2 and 3

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JULY 1, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND ENTERGY NUCLEAR OPERATIONS, INC. CONCERNING THE DRAFT 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)

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Entergy Nuclear Operations, Inc. (Entergy), held a telephone conference call on July 1, 2015, to discuss and clarify the NRC staff's request for additional information (RAI) concerning the Indian Point Nuclear Generating Unit Nos. 2 and 3 license renewal application safety review.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the RAIs discussed with Entergy, including a brief description of the status.

Entergy had an opportunity to comment on this summary.

/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

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*concurrence via e-mail

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DATE	7/14/15	7/22/15	7/22/15	7/22/15

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REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE
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TELEPHONE CONFERENCE CALL
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
JULY 1, 2015

PARTICIPANTS:

Bart Fu
William Holsten
Michael Wentzel
Stephen Eric Clair
Dave Lach
Rich Louie
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AFFILIATIONS:

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TELEPHONE CONFERENCE CALL CONCERNING
DRAFT 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

JULY 1, 2015

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Entergy Nuclear Operations, Inc. (Entergy), held a telephone conference call on July 1, 2015, to discuss and clarify the following requests for additional information (RAIs) concerning the license renewal application safety review.

RAI 3.0.3-16

Background

As amended by letter dated March 10, 2015, 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 GALL 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 recommendations in AMP XI.M42 (e.g., inspection intervals, acceptance criteria) are 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.

Discussion: *Entergy requested clarification as to what information the staff was requesting. The staff stated that AMP XI.M42 does not include any elevated temperature environments. As such, the staff needs to know the coating type to ensure that the condition monitoring recommendations of AMP XI.M42 are appropriate. Subsequent to the telephone conference call, Entergy requested that the NRC specify which statement in LR-ISG-2013-01 indicates that "Environments with high temperatures are not evaluated to be bounding within the assumptions of GALL AMP XI.M42" as stated in RAI 3.0.3-16. The NRC staff clarified that there is no explicit statement in the ISG that states that high-temperature environments are not evaluated to be bounding. However, the scope of AMP XI.M42 states:*

Scope of Program: The scope of the program is internal coatings/linings for in-scope piping, piping components, heat exchangers, and tanks exposed to closed-cycle cooling water, raw water, treated water, treated borated water,

ENCLOSURE 2

waste water, fuel oil, and lubricating oil where loss of coating or lining integrity could prevent satisfactory accomplishment of any of the component's or downstream component's CLB intended functions identified under 10 CFR 54.4(a)(1), (a)(2), or (a)(3).

Further, if high-temperature environments had been included, the scope of the program would have listed environments such as Treated water >60°C (>140°F) or Closed-cycle cooling water >60°C (>140°F) from Generic Aging Lessons-Learned Report Section IX.D and the Generic Aging Lessons-Learned Report aging-management program line item tables.

No changes were made to the RAI as a result of these discussions.

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. 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 Unit 2 has entered timely renewal and Indian Point Unit 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.

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.

Discussion: *Entergy stated that they understood what information the NRC staff was requesting.*

RAI 3.0.3–18

Background

As amended by letter dated March 10, 2015, LRA Section B.1.14, "Fire Water System," provides an enhancement to the "corrective actions" program element associated with returning degraded coatings (i.e., peeling, delaminated, or blistered) coatings to service without repair,

replacement or removal. No exceptions related to conducting adhesion testing are stated in LRA Section B.1.43, "Coating Integrity."

Issue

GALL Report AMP XI.M42, element 7, "corrective actions," recommends that the coatings/linings for in-scope components that do not meet acceptance criteria are repaired, replaced, or removed. GALL Report AMP XI.M42 allows an alternative, which recommends, among other things, that adhesion testing be performed before returning degraded (i.e., peeling, delaminated, or blistered) coatings to service. For the alternative for returning a coating exhibiting peeling and delamination to service without repair, the Fire Water System program does not include adhesion testing as part of the alternative. In addition, the enhancement states that for coatings exhibiting blistering, "light tapping" of the coating will be performed to determine the extent of blistering. AMP XI.M42 only recommends the use of "light tapping" when it is physically impossible to perform adhesion testing.

LRA Section B.1.14 did not state an exception to adhesion testing even though the proposed changes to the Fire Water System program were not consistent with GALL Report AMP XI.M42. LRA Section B.1.43 does not state an exception to adhesion testing. It is not clear to the staff whether adhesion testing will be conducted prior to returning degraded coatings/linings within the scope of the Coating Integrity Program to service.

Request

1. State whether the Coating Integrity Program will include adhesion testing prior to returning degraded coatings/linings to service.
2. If the Coating Integrity Program does not include adhesion testing for returning degraded coatings/linings to service, explain why adhesion testing is not needed as part of the alternative for returning degraded coatings to service for in-scope fire water system components.

Discussion: *Entergy stated that it intends to perform adhesion testing as recommended in AMP XI.M42. As such, no exceptions were stated related to adhesion testing. As such, the staff agreed to delete this RAI and would document the use of adhesion testing, as stated by the applicant, as appropriate.*