

U.S. Nuclear Regulatory Commission Public Meeting Summary

Title: Public Meeting with Entergy Nuclear Operations, Inc. (Entergy) Regarding Proposed Changes to the Service Water Integrity Program for the Indian Point Nuclear Generating Unit Nos. 2 and 3 (IP2 and IP3) License Renewal Application (LRA)

Meeting Identifier: 20161263

Date of Meeting: Tuesday, October 4, 2016

Location: NRC One White Flint North, O-9B4
11555 Rockville Pike
Rockville, MD

Type of Meeting: Category 1

Purpose of the Meeting:

The purpose of the meeting was for Entergy to describe proposed changes to the IP2 and IP3 Service Water Integrity Program. The proposed changes are in response to the U.S. Nuclear Regulatory Commission (NRC) staff's July 25, 2016, request for additional information regarding its review of the IP2 and IP3 LRA.

General Details:

The NRC held a meeting on October 4, 2016, from 9:00 a.m. – 10:00 a.m. EDT. The meeting began with an introduction, an overview of meeting logistics, and an introduction of attendees. Entergy then presented an overview of its proposed changes to the IP2 and IP3 Service Water Integrity Program to address the NRC staff's request for additional information. Following the presentation, the meeting was opened for discussion between the NRC and Entergy staff.

Approximately 23 people participated in the meeting. Meeting participants included representatives from the NRC and Entergy, as well as five unidentified members of the public or interested stakeholders that participated via telephone.

Summary of Presentation:

Entergy presented an overview of its proposed enhancements to the IP2 and IP3 Service Water Integrity Program to address the NRC staff's July 25, 2016, request for additional information. A summary of the proposed enhancements and discussion during the meeting is outlined below.

RAI 3.0.3-10 Request 1

Entergy stated that it proposed to enhance the Service Water Integrity Program to establish goals for the number of occurrences of service water piping degradation (either through-wall leakage or greater than 50 percent reduction in wall thickness) recurring internal corrosion. For one to five instances of such degradation in safety-related piping, Entergy would

perform 10 augmented inspections. For greater than five instances, a minimum of 15 augmented inspections will be performed. In nonsafety-related piping, five additional inspections would be performed if a through-wall leak occurs. In addition, Entergy proposed to enhance the Service Water Integrity Program to perform a robotic inspection of underground and accessible above-ground service water piping during the second 10-year license renewal period (i.e., continuation of the first 10-year license renewal period).

Regarding the additional inspections, the NRC staff asked Entergy what the acceptance criteria would be. Entergy stated that the degradation would be evaluated by performing a calculation to determine the remaining useful life for the piping relative to structural integrity. The staff stated that acceptance criteria for structural integrity does not address future leaks, as discussed during the staff's February audit regarding a fire water system leak.

Regarding robotic inspections, the NRC staff asked Entergy whether robotic inspections were performed as part of the current program. Entergy stated that there is a current preventive maintenance item to perform a robotic inspection of the service water piping every 8 years. When asked how making this enhancement would differ from what is done currently, Entergy stated that making this enhancement would result in a regulatory commitment to perform the inspection for license renewal and ensure that an inspection is performed during the second 10-year period of the period of extended operation.

RAI 3.0.3-10 Request 2a

Entergy stated that it proposed to verify that service water system piping in areas that are susceptible to flooding is considered in-scope for license renewal. Additionally, the program would be enhanced to ensure that inspections on the nonsafety-related piping (within the scope of license renewal) would be conducted on the same frequency as the safety-related piping.

The NRC staff asked Entergy whether they had assessed the effectiveness of the corrective actions taken in response to Licensee Event Report (LER) 286/2011-003, considering that similar leakage was identified in a valve pit subsequent to the LER. Entergy stated that they were unaware of the circumstances associated with the second leak and asked the NRC staff to identify documentation describing the leakage to which the NRC staff had referred. The NRC staff committed to identifying the applicable documentation. Entergy state that it would address the effectiveness of the corrective actions subsequent to the LER in the response to this request. (See **Action Items/Next Steps** below for additional information.)

RAI 3.0.3-10 Request 3

Entergy stated that it proposed to enhance the Service Water Integrity Program to include silt monitoring and that the change would be implemented by identifying its relationship to license renewal in the IP2 and IP3 Generic Letter 89-13 program documentation.

RAI 3.0.3-10 Requests 4a and 4b

Entergy stated that it proposed to enhance the Service Water Integrity Program to incorporate layup procedures for the radiation monitoring piping. Entergy stated that the subject leakage occurred when the system was isolated for maintenance without properly laying up the system beforehand.

RAI 3.0.3-10 Request 5a

Entergy stated that it proposed to enhance the Service Water Integrity Program by developing goals and increasing the frequency of performing the service water piping and valve flush procedure, if these goals are not met.

RAI 3.0.3-10 Request 6

Entergy stated that it proposed to enhance the Service Water Integrity Program to clarify that the minimum number of augmented inspections that will be performed in response to any identified leakage associated with corrosion would be five inspections for through-wall leakage on piping within the scope of license renewal in accordance with Section 54.4(a)(2) of Title 10 of the Code of Federal Regulations.

Implementation Schedule

Entergy stated that all enhancements would be implemented as soon as practicable, but not later than December 31, 2019.

Public Participation Themes:

No questions or comments were provided to the NRC staff during the public participation portion of the meeting.

Action Items/Next Steps:

During the meeting, the NRC staff committed to providing Entergy with the reference to the documentation of additional valve pit leakage. Subsequent to the meeting, the NRC staff identified that the leakage appears to be documented in Condition Report CR IP3 2013 0507, as noted in the staff's Audit Report dated June 15, 2016.

Attachments:

- Meeting description and agenda – ML16265A460
- Entergy's agenda – M16280A548

RAI 3.0.3-10 Request 5a

Entergy stated that it proposed to enhance the Service Water Integrity Program by developing goals and increasing the frequency of performing the service water piping and valve flush procedure, if these goals are not met.

RAI 3.0.3-10 Request 6

Entergy stated that it proposed to enhance the Service Water Integrity Program to clarify that the minimum number of augmented inspections that will be performed in response to any identified leakage associated with corrosion would be five inspections for through-wall leakage on piping within the scope of license renewal in accordance with Section 54.4(a)(2) of Title 10 of the Code of Federal Regulations.

Implementation Schedule

Entergy stated that all enhancements would be implemented as soon as practicable, but not later than December 31, 2019.

Public Participation Themes:

No questions or comments were provided to the NRC staff during the public participation portion of the meeting.

Action Items/Next Steps:

During the meeting, the NRC staff committed to providing Entergy with the reference to the documentation of additional valve pit leakage. Subsequent to the meeting, the NRC staff identified that the leakage appears to be documented in Condition Report CR IP3 2013 0507, as noted in the staff's Audit Report dated June 15, 2016.

Attachments:

- Meeting description and agenda – ML16265A460
- Entergy's agenda – M16280A548

ADAMS Accession Nos.: ML16285A179 (Package); ML16281A216 (Summary);
ML16265A460 (Description and Agenda); ML16280A548 (Entergy's Agenda) *concurring via email

OFFICE	LA:DLR*	PM:RERP:DLR	BC:RARB:DLR	BC:RPB1:DLR
NAME	IBetts	MWentzel	DMorey	YDiaz-Sanabria
DATE	10/ 17 /16	10/ 24 /16	10/ 25 /16	10/ 25 /16

OFFICE RECORD COPY

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION PUBLIC MEETING SUMMARY

DISTRIBUTION:

HARD COPY:

DLR RF

E-MAIL:

PUBLIC

RidsNrrDlr Resource

RidsNrrDlrRpb1 Resource

RidsNrrDlrRarb Resource

RidsNrrDlrRasb Resource

RidsNrrDlrRapb Resource

RidsNrrDlrRerb Resource

RidsNrrDlrRsrg Resource

RidsOgcMailCenter Resource

MWentzel

YDiaz

JGavula

BAllik

DMorey

DPickett

STurk, OGC

DRoth, OGC

BHarris, OGC

SBurnell, OPA

DMcIntyre, OPA

JWeil, OCA

MGray, RI

GDentel, RI

DonaldJackson, RI

MModes, RI

NSheehan, RI OPA

DScrenci, RI OPA

DTifft, RI

BHaagensen, RI

GNewman, RI

SRich, RI

**U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of License Renewal**

**Indian Point Nuclear Generating Unit Nos. 2 and 3
License Renewal Application**

**List of Participants
October 4, 2016**

PARTICIPANTS:

Brian Allik
Benjamin Beasley
William Burton
Yaira Diaz-Sanabria
Jim Gavula
Brian Harris
Bill Holston
Dennis Morey
David Roth
Michael Wentzel
Richard Burroni
Charles Caputo
Michael Kempinski
Richard Louie
Thomas Orlando
Dennis Pennino
Andrew Taylor
Robert Walpole

AFFILIATIONS:

U.S. Nuclear Regulatory Commission (NRC)
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
NRC
Entergy Nuclear Operations, Inc. (Entergy)
Entergy
Entergy
Entergy
Entergy
Entergy
Entergy
Entergy