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NL-16-123

October 27, 2016

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
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SUBJECT: Mitigating Strategies Assessment (MSA) for Flooding Submittal for  
Indian Point Units 2 and 3 (CAC Nos. MF-3313 and 3314)  
Docket Nos. 50-247 and 50-286  
License Nos. DPR-24 and DPR-64

- REFERENCES:
1. NRC letter to Entergy, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the NTTF Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012 (ML12053A340).
  2. Entergy letter (NL-13-156) to NRC, Entergy's Required Response 2 to NTTF Recommendation 2.1: Flooding-Hazard Evaluation Report, dated December 23, 2013.
  3. Entergy letter (NL-14-148) to NRC, Entergy's Supplemental Response to NRC Request for Additional Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated December 9, 2014.
  4. Entergy letter (NL-15-151) to NRC, Entergy's Submittal of Revision 1 to "Flood Hazard Re-evaluation – Combined Effect Floods – Coastal Processes" In Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated December 10, 2015.
  5. NRC Staff Requirements Memoranda to COMSECY-14-0037, "Integration of Mitigating Strategies for Beyond-Design-Basis External Events and the Reevaluation of Flooding Hazards", dated March 30, 2015 (ML 15089A236).
  6. NRC Letter, Coordination of Requests for Information Regarding Flooding Hazard Reevaluations and Mitigating Strategies for Beyond-Design-Basis External Events, dated September 1, 2015 (ML15174A257).

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7. Nuclear Energy Institute (NEI), Report NEI 12-06 (Rev 2), Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, dated December 2015 (ML15348A015).
8. U.S. Nuclear Regulatory Commission, JLD-ISG-2012-01, Revision 1, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for Beyond-Design-Basis External Events, dated January 22, 2016 (ML15357A163).
9. NRC Letter, Plant Name and Unit -Interim Staff Response to Reevaluated Flood Hazards Submitted in Response to 10 CFR 50.54(f) Information Request-Flood-Causing Mechanism Reevaluation (CAC Nos. MF-3313 and 3314), dated April 25, 2016.
10. Entergy letter (NL-16-029) to NRC, Entergy Basis For Performance of the Mitigating Strategies Assessment with the Flood Hazard Information And Report For Recommendations 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 21, 2016.
11. Entergy letter (NL-16-035) to NRC, Entergy Supplement to Basis For Performance of the Mitigating Strategies Assessment with the Flood Hazard Information And Report For Recommendations 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated April 5, 2016.

Dear Sir or Madam:

The purpose of this letter is to transmit the Mitigating Strategies Assessment for Flooding Report for Indian Point Units 1 and 2 (enclosure).

On March 12, 2012, the NRC issued Reference 1 to request information associated with Near Term Task Force (NTTF) Recommendation 2.1 for Flooding. One of the Required Responses in Reference 1 directed licensees to submit a Flood Hazard Reevaluation Report (FHRR). For Indian Point Units 2 and 3, the FHRR was submitted on December 23, 2013 (Reference 2). Additional information was provided with Reference 3 and Revision 1 was submitted in Reference 4.

Concurrent to the flood hazard reevaluation, Indian Point Units 2 and 3 developed and implemented mitigating strategies in accordance with NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond - Design-Basis External Events". In Reference 5, the NRC affirmed that licensees need to address the reevaluated flooding hazards within their mitigating strategies for beyond-design basis (BDB) external events, including the reevaluated flood hazards. This requirement was confirmed by the NRC in Reference 6. Guidance for performing MSA for Flooding is contained in Appendix G of Reference 7, endorsed by the NRC in

Reference 8. For the purpose of the MSA for Flooding and in Reference 6, the NRC termed the reevaluated flood hazard, summarized in Reference 9, as the "Mitigating Strategies Flood Hazard Information" (MSFHI).

In Reference 9, the NRC concluded that the "reevaluated flood hazards information, as summarized in the Enclosure, is suitable for the assessment of mitigating strategies developed in response to Order EA-12-049" for Plant and Unit. Reference 9 was based on the use of the flood values in References 10 and 11 which had been submitted for use in the MSA only and did not represent the flood values calculated by Entergy in Reference 4.

The enclosure to this letter provides the Mitigating Strategies Assessment for Flooding Report for Indian Points 2 and 3. The assessment concluded that the existing FLEX strategy can be successfully implemented and deployed as designed for all applicable-flood causing mechanisms except for storm surge which requires flood protection leading to the Unit 2 and Unit 3 electrical switchgear rooms.

This letter contains no new regulatory commitments.

Should you have any questions concerning the content of this letter, please contact Robert Walpole, Manager, Regulatory Assurance at 914-254-6694.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 27, 2016.

Sincerely,



AJV / sp

Enclosure: Mitigating Strategies Assessment for Flooding Report for Indian Points 2 and 3

cc: Mr. Douglas V. Pickett, Senior Project Manager, NRC NRR DORL  
Mr. Daniel H. Dorman, Regional Administrator, NRC Region 1  
Mr. Victor Hall, Senior Project Manager, NRC NRR DJLL  
NRC Resident Inspectors Office  
Mr. John B. Rhodes, President and CEO, NYSERDA  
Ms. Bridget Frymire, New York State Dept. of Public Service