



UNITED STATES
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February 23, 2018

MEMORANDUM TO: File

FROM: Richard V. Guzman, Senior Project Manager /RA/
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 – REVIEW OF
UPDATED FINAL SAFETY ANALYSIS REPORT, REVISION 7
(EPID L-2017-LRO-0075)

BACKGROUND

After the events of September 11, 2001, the U.S. Nuclear Regulatory Commission (NRC or the Commission) assessed and revised its sensitive information control policies to provide greater assurance against publicly disclosing information that could reasonably be expected to be useful to potential adversaries. On November 9, 2004, the Commission issued SRM-SECY-04-0191 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML043140175), which approved (among other things), proposed guidance to prohibit proactive release to the public of sensitive unclassified information concerning nuclear power reactors. Consistent with this direction, updated final safety analysis reports (UFSARs) were presumptively withheld from public release. In June 2015, the Commission issued SRM-SECY-15-0032 (ADAMS Accession No. ML15167A090), which approved the staff's recommendation to discontinue the presumptive withholding from public release of final safety analysis report updates, emergency preparedness documents, and fire protection-related documents, and to withdraw the direction provided in SRM-SECY-04-0191 to the extent that SRM-SECY-04-0191 approved presumptive withholding of these documents. Given the issuance of SRM-SECY-15-0032, UFSAR updates are to be reviewed per the NRC Sensitive Unclassified Non-Safeguards Information (SUNSI) policy and proactively released, as appropriate (as of December 15, 2015).

By letter dated October 2, 2017 (ADAMS Accession No. ML17299A164), Entergy Nuclear Operations, Inc. (the licensee) submitted Revision 7 to the Indian Point Nuclear Generating Unit No. 3 (Indian Point Unit 3) UFSAR in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.71, "Maintenance of records, making of reports," paragraph (e). The purpose of this memorandum is to document the review of the Indian Point Unit 3 UFSAR revision in accordance with the guidance provided in NRC Regulatory Issue Summary (RIS) 2015-17, "Review and Submission of Updates to Final Safety Analysis Reports, Emergency Preparedness Documents, and Fire Protection Documents" (ADAMS Accession No. ML15321A400). As suggested in RIS 2015-17, the licensee provided a copy of the Indian Point Unit 3 UFSAR. Additionally, the licensee provided a second copy of the UFSAR that redacted portions containing sensitive information.

EVALUATION

The review of the Indian Point Unit 3 UFSAR for sensitive information was conducted using guidelines in Attachment 1 to SECY-04-0191 (ADAMS Accession No. ML042310663), which was identified as an aid in RIS 2015-17. SECY-04-0191 provides a general framework and discussion of SUNSI, as well as a table detailing specific examples of sensitive information that should be withheld from public disclosure. This table is organized by categories of information (e.g., plant drawings, hydrological information, risk information, fire protection) loosely aligning with a large number of standard sections of UFSARs, and provides specific examples of information that should be withheld from public disclosure under 10 CFR 2.390(d)(1). In addition to the table, the project manager guidance for SUNSI reviews that is available on the Division of Operating Reactor Licensing (DORL) SharePoint site was considered.

A review of the entire UFSAR was not conducted. Instead, a review of select portions of the Indian Point Unit 3 UFSAR was conducted that included:

- All site drawings, plant arrangement drawings, and similar figures
- All Revision 7 changes
- Chapter 1, "Introduction and Summary"
- Chapter 2, "Site and Environment"
- Chapter 5, "Containment"
- Chapter 6, "Engineered Safety Features"
- Chapter 7, "Instrumentation and Control"
- Chapter 9, "Auxiliary and Emergency Systems"
- Chapter 10, "Steam and Power Conversion System"
- Chapter 11, "Waste Disposal and Radiation Protection System"
- Chapter 12, "Conduct of Operations"
- Chapter 14, "Safety Analysis"

The review of the selected portions excluded sections, subsections, and appendices that contained subjects identified as uncontrolled in the table in Attachment 1 to SECY-04-0191. In addition to reviewing portions of the Indian Point Unit 3 UFSAR identified above, the portions of the UFSAR identified by the licensee as sensitive were reviewed to confirm the information redacted by the licensee met the guidelines in the table in Attachment 1 to SECY-04-0191.

CONCLUSION

The following portions of the Indian Point Unit 3 UFSAR were redacted prior to public release:

- Chapter 1, Plant Drawing 9321-F-64514
- Chapter 1, Plant Drawing 9321-F-25113
- Chapter 1, Plant Drawing 9321-F-25143
- Chapter 1, Plant Drawing 9321-F-25153
- Chapter 2, Plant Drawing 9321-F-64514
- Chapter 5, Plant Drawing 9321-F-25013
- Chapter 5, Plant Drawing 9321-F-25023
- Chapter 5, Plant Drawing 9321-F-25033
- Chapter 5, Plant Drawing 9321-F-25063
- Chapter 5, Plant Drawing 9321-F-25073

- Chapter 5, Plant Drawing 9321-F-25083
- Chapter 6, Plant Drawing 9321-F-40253
- Chapter 7, Plant Drawing 9321-F-30523
- Chapter 7, Plant Drawing 9321-F-33833
- Chapter 9, Plant Drawing 9321-F-25143
- Chapter 10, Plant Drawing 9321-F-20113
- Chapter 10, Plant Drawing 9321-F-20123
- Chapter 10, Plant Drawing 9321-F-20143
- Chapter 10, Plant Drawing 9321-F-20153
- Chapter 11, Plant Drawing 9321-F-25023
- Chapter 11, Plant Drawing 9321-F-25033
- Chapter 11, Plant Drawing 9321-F-25083
- Chapter 11, Plant Drawing 9321-F-25123
- Chapter 11, Plant Drawing 9321-F-25243

Based on the review described above, a redacted version of the Indian Point Unit 3 UFSAR, Revision 7, was made publicly available (ADAMS Package Accession No. ML17299A163). The redactions are consistent with the guidelines in Attachment 1 to SECY-04-0191.

Per the instructions in the project manager guidance for SUNSI reviews, appropriate copies of the Indian Point Unit 3 UFSAR have been uploaded to the DORL SharePoint site. The issuance of this memorandum and public release of a redacted version of the Indian Point Unit 3 UFSAR, Revision 7, will close electronic project identifier EPID L-2017-LRO-0075.

Docket No. 50-286

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