

July 29, 2008

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3 - REPORT ON RESULTS OF STAFF AUDIT OF CORRECTIVE ACTIONS TO ADDRESS GENERIC LETTER 2004-02 (TAC NOS. MC4689 AND MC4690)

Dear Sir or Madam:

Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," requested that all pressurized-water reactor (PWR) licensees (1) evaluate the adequacy of the emergency sump recirculation function with respect to potentially adverse effects associated with post-accident debris, and (2) implement any plant modifications determined to be necessary. Entergy Nuclear Operations, Inc. (Entergy or the licensee), has conducted an evaluation of recirculation sump performance for Indian Point Nuclear Generating Unit Nos. 2 and 3 (IP2 and IP3). In addition, Entergy has installed new recirculation sump strainers and containment sump strainers and upstream flow barriers and debris interceptors at both reactors.

Consistent with the discussion in the "Reasons for Information Request" section of GL 2004-02, the Nuclear Regulatory Commission (NRC) staff is using sample audits to help verify that licensees have resolved the concerns identified in the GL. The NRC staff has conducted a detailed audit of the new sump strainer design and associated analyses and testing for IP2 and IP3.

The NRC staff is forwarding the IP2 and IP3 Generic Safety Issue (GSI)-191 audit report to Entergy. The enclosed audit report provides Entergy feedback on its GL 2004-02 corrective actions and supporting analyses. Also, this audit report will serve as a vehicle to inform other PWR licensees of the NRC staff's technical positions on various aspects of GSI-191, PWR Sump Performance.

The NRC staff previously forwarded a draft of this audit report to Entergy. By letter dated July 21, 2008, Entergy, after consultation with its vendors for GL 2004-02 corrective actions, informed the NRC staff that the audit report contained no proprietary information. Entergy was supportive during all phases of the audit. Consideration was given by Entergy in providing appropriate office space, equipment, and ensuring appropriate vendor personnel were available to support the audit team. Your primary point-of-contact during the preparation, conduct, and report-writing phases of the audit was helpful in accomplishing the audit.

The enclosed audit report does not reach a conclusion regarding the overall adequacy of Entergy's GL 2004-02 corrective actions for IP2 and IP3. The NRC staff expects that Entergy

will provide a supplemental response to GL2004-02 after the October 2008 completion of corrective actions for GL2004-02. This supplemental response should address the open items in the enclosed audit report. This expectation has been stated in public meetings with the licensee. It is reinforced in a GL 2004-02 supplemental response content guide that the NRC staff released in August 2007 and revised in November 2007. NRC staff consideration of Entergy's GL 2004-02 supplemental response, including its response to audit open items, will result in a letter to Entergy assessing the overall adequacy of the IP2 and IP3 GL 2004-02 corrective actions.

The audit team did not evaluate whether Entergy has identified and/or submitted appropriate licensing documents for its GL 2004-02 corrective actions. The licensee's maintenance of its licensing basis is within the scope of the Reactor Oversight Program. The audit team did not evaluate the completeness of the licensee's implementation of GL 2004-02 corrective actions. That is also within the scope of the Reactor Oversight Program under TI 2515/166, "Pressurized Water Reactor Containment Sump Blockage."

Sincerely,

/RA/

John P. Boska, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:
As stated

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will provide a supplemental response to GL2004-02 after the October 2008 completion of corrective actions for GL2004-02. This supplemental response should address the open items in the enclosed audit report. This expectation has been stated in public meetings with the licensee. It is reinforced in a GL 2004-02 supplemental response content guide that the NRC staff released in August 2007 and revised in November 2007. NRC staff consideration of Entergy's GL 2004-02 supplemental response, including its response to audit open items, will result in a letter to Entergy assessing the overall adequacy of the IP2 and IP3 GL 2004-02 corrective actions.

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Sincerely,

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John P. Boska, Senior Project Manager
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