



September 24, 2001

Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL-01-116

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station O-P1-17  
Washington, DC 20555-0001

Subject: Supplemental Information Regarding Relief Request to Allow Use of ASME Code Case N-597 (Relief Request No. 58)

Reference: 1) September 7, 2001 Conference Call between NRC and ENOI  
2) Con Edison Letter to USNRC, "Relief Request to Allow Use of ASME Code Case N-597 (Relief Request No. 58)," dated March 22, 2001

Dear Sir:

On September 7, 2001 a conference call was held between Entergy Nuclear Operations, Inc. (ENOI) and the Nuclear Regulatory Commission to discuss a request for relief from certain requirements of the American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel Code for Indian Point Unit 2. Specifically, relief was requested to allow the use of ASME Code Case N-597 for evaluations to determine the structural capability of components degraded by non-uniform localized pipe wall thinning. To facilitate the staff's review of the subject relief request, the following additional clarifications regarding the application of Code Case N-597 are provided.

Structural evaluations performed under the scope of the subject relief request (i.e., application of Code Case N-597 within the ASME Section XI boundaries) to evaluate Flow Accelerated Corrosion (FAC) degradation, will use the following methodology to calculate wear rates and sample expansions:

1. Wear Rate Calculation - Component wear rates will be calculated consistent with the methods described in EPRI Report NSAC-202L-R2, paragraph 4.6.3 and described in Section 10.1 of the Indian Point 2 FAC Program Plan Supplement.
2. Sample Expansion - Requirements for sample expansion are described in Section 10.3 of the Indian Point 2 FAC Program Plan Supplement. When specified minimum wall thickness limits are exceeded, the inspection sample will be expanded to include additional susceptible locations as described in paragraph 4.4.1.2 of EPRI Report NSAC-202L-R2 and described in paragraph 5.14 of the Indian Point 2 FAC Program Plan.

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The Indian Point 2 FAC program was developed to be consistent with the NSAC-202L recommendations. While NSAC-202L is not a regulatory document, it does provide recommended practices and essential elements for maintaining an effective FAC program. The implementation of these recommendations will be as follows:

1. NSAC recommendations identified by "shall" - are considered mandatory requirements.
2. NSAC recommendations identified by "should" - are not mandatory; however, it is the most preferred or desirable method to be adhered to unless determined otherwise by the FAC program engineer or management.

The use of Code Case N-597 will be limited to FAC-like wall thinning.

No new regulatory commitments are being made by ENOI in this correspondence.

Should you or your staff have any questions regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing at (914) 734-5074.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Dacimo". The signature is written in a cursive style with a large initial "F" and "D".

Fred Dacimo  
Vice President - Operations  
Indian Point 2

cc: Next page

cc: Mr. Hubert J. Miller  
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