



**Entergy Nuclear Northeast**  
Entergy Nuclear Operations, Inc.  
Indian Point Energy Center  
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November 30, 2001  
Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL 01-136

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

**SUBJECT:** Response to Request for Additional Information Regarding Removal of Containment Isolation Valve Lists from the Technical Specifications (TAC No: MB2416)

**References:** 1. Consolidated Edison letter (NL00-095) to NRC, "Indian Point 2 License Amendment Request – Removal of Containment Isolation Valve Lists from the Technical Specifications," dated July 13, 2001

By letter (Ref. 1) dated July 13, 2001, Consolidated Edison (the former licensee) submitted an application for an amendment to the Technical Specifications (TS) for Indian Point Nuclear Generating Unit No. 2 (IP2). The proposed amendment requested removal of containment isolation valve lists from the TS. The U.S. Nuclear Regulatory Commission (NRC) staff reviewed this submittal, determined that additional information was required to complete its review, and requested that additional information by telephone on October 15, 2001. This letter submits Entergy Nuclear Operation's (ENO) response to the NRC's request for additional information.

Attachment 1 to this letter provides the requested additional information. As a result of the request for additional information, ENO submits a revised TS Bases page, included in Attachment 2.

Since this submittal only includes a clarification regarding the implementation of the proposed License Amendment and adds a reference to an accompanying TS Bases page, there is no impact on the No Significant Hazards Evaluation submitted in Ref. 1. Therefore, this submittal does not include a revised No Significant Hazards Consideration Evaluation.

There are no commitments in this letter.

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

Very truly yours,

A handwritten signature in black ink, appearing to be 'FD', written over a horizontal line.

Fred Dacimo  
Vice President – Operations  
Indian Point 2

cc:

Mr. Hubert J. Miller  
Regional Administrator-Region I  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
ENTERGY NUCLEAR OPERATIONS, INC. ) Docket No. 50-247  
Indian Point Nuclear Generating Unit No. 2 )

APPLICATION FOR AMENDMENT  
TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission (NRC), Entergy Nuclear Operations, Inc., as holder of Facility Operating License No. DPR-26, hereby submits additional information to support the application for amendment of the Technical Specifications submitted on July 13, 2001.

The specific additional information is set forth in Attachment 1. A revised TS Bases page is included in Attachment 2. The assessment contained in the submittal of July 13, 2001 demonstrated that the proposed change does not involve a significant hazards consideration as defined in 10CFR50.92(c). That assessment is unchanged by the additional information.

As required by 10CFR50.91(b)(1), a copy of this submittal has been provided to the appropriate New York State official designated to receive such amendments.

BY:   
Fred Dacimo  
Vice President – Operations  
Indian Point 2

Subscribed and sworn to  
before me this 30<sup>th</sup> day  
November, 2001.

  
Notary Public

KAREN L. LANCASTER  
Notary Public, State of New York  
No. 60-4843659  
Qualified in Westchester County  
Term Expires 9/30/05

**ATTACHMENT 1 TO NL 01-136**

**Response to Request for Additional Information Regarding Proposed  
Removal of Containment Isolation Valve Lists from the Technical Specifications**

ENTERGY NUCLEAR OPERATIONS, INC  
INDIAN POINT UNIT NO. 2  
DOCKET NO. 50-247

**Response to Request for Additional Information**  
**Removal of Containment Isolation Valve Lists from the Technical Specifications**  
**Indian Point Unit 2**

**Request No. 1**

Provide a clarification to the statement in the License Amendment Request Attachment 1 “Method of Complying” with GL 91-08 Guidance Item 2 regarding the relocation of information from current TS Tables 3.6-1 and 4.4-1 to provide assurance that future changes to containment isolation valve requirements will be properly evaluated in accordance with 10CFR50.59.

**Response to Request No. 1**

UFSAR Section 5.2, “Containment Isolation System,” contains a description of and the requirements for containment isolation valves. UFSAR Section 5.2 includes UFSAR Table 5.2-1, “Containment Piping Penetrations and Valving,” that contains a list of all containment penetrations with requirements identified for each penetration and its associated containment isolation valves. Section 5.2 also contains numerous figures that pictorially depict containment isolation valve arrangements for each penetration. With the implementation of the approved License Amendment, the information currently contained in TS Tables 3.6-1 and 4.4-1 for each identified containment isolation valve will be relocated to UFSAR Section 5.2. Appropriate plant procedures will implement the proposed TS for the containment isolation valves and requirements listed in the UFSAR. This will ensure that future changes to the containment isolation valve list or requirements are properly evaluated in accordance with 10CFR50.59.

**Request No. 2**

Add a reference in TS Bases 3.6 for the UFSAR sections to which the TS requirements will be relocated.

**Response to Request No. 2**

Presented in Attachment 2 is a revised TS Bases page 3.6-4 with changes previously proposed. A new reference to UFSAR Section 5.2 (underlined) has been added.

**ATTACHMENT 2 TO NL 01-136**  
**TECHNICAL SPECIFICATION BASES PAGE IN**  
**STRIKEOUT/SHADOW FORMAT**

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Deleted text is shown as ~~strikeout~~.

Added text is shown as shaded.

The requirement of a 50°F minimum containment ambient temperature is to assure that the minimum service metal temperature of the containment liner is well above the NDT + 30°F criterion for the liner material<sup>(1)</sup>.

~~Table 3.6-1 lists non-automatic valves that are designated as part of the containment isolation function.~~ During periods of normal plant operations requiring containment integrity, non-automatic valves that are designated as part of the containment isolation function ~~on this Table will~~ may be opened either continuously or intermittently depending on requirements of the particular protection, safeguards or essential service systems. The valves ~~to be open~~ which are opened intermittently are under administrative control and are open only for as long as necessary to perform their intended function. These administrative controls consist of stationing a dedicated operator at or near the valve controls who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when the need for containment isolation is indicated. The dedicated operator is permitted to be stationed nearby, so as to minimize the radiation exposure associated with the compensating action. Transit time to the valve will remain less than two minutes. For those valves that are remote-manually operated from the control room, the dedicated operator administrative control is clarified to be the normally stationed control room operator, since this operator is continuously available to isolate the valve from the control room. An exception to these administrative controls is provided for valve 732 when the RHR system is operating in RHR Cooling mode. Valve 732 is the RHR pumps' suction line isolation valve that is continuously open during RHR cooling when the RCS temperature is < 350°F. If containment isolation is required, valve 732 is shut in accordance with administrative controls to realign the RHR system for safety injection.

In all cases, however, ~~the valves listed in Table 3.6-1~~ those containment isolation valves that are not required to be opened post-accident are closed during the post-accident period in accordance with plant procedures and consistent with requirements of the related protection, safeguards, or essential service systems.

#### Reference

- (1) UFSAR Section 5.1.1.1
- (2) UFSAR Section 5.2