

From: Hansraj Ashar NRR/DLPM/PDI-1
To: Patrick Milano NRR/DE/EMEB
Date: 1/24/02 10:44AM
Subject: RAI2, IP2 - ILRT Extension

Pat:

The Attachment is our second RAI. I do not mind having a teleconference on Monday.

Hans

CC: David Terao; James Pulsipher

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REQUEST FOR ADDITIONAL INFORMATION - 2
INDIAN POINT, UNIT 2
ONE TIME DEFERRAL OF INTEGRATED CONTAINMENT LEAK RATE TESTING

- References:
1. Letter from Con Edison to NRC, "Indian Point, Unit 2, License Amendment Request, Containment Integrated Leakage Rate Testing Frequency," July 13, 2001.
 2. Letter from Entergy to NRC, "IP2 - Response to Request for Additional Information Regarding One-time Extension of Containment ILRT Interval, November 30, 2001.

1. Based on the review of Reference 2, the staff observes that the IP2 containment has a number of areas of spalled and cracked concrete, reinforcing bar and cadweld splice corrosion, and liner corrosion. Entergy has decided not to take corrective actions for most of these degradations, based on its engineering analysis. With so many areas of degradations and possibility of degradation in uninspectable areas of the containment liner, provide justification why you should not perform an ILRT between June 2001 and August 2002 to ensure the leak tightness of the "as is" containment.
2. When combined with the possibility of corrosion degradations in uninspectable areas of the liner or penetrations, the areas of liner leakages under a design basis accident pressures or under one of the severe accident scenarios could give rise to leak rates in excess of $35L_a$, [threshold limit for Class 3b accident (Attachment 3, Reference 1)]. For a dry PWR containment (similar to IP2 containment) NUREG 1493 estimates an approximate leak area of 6.5 square inches for leak rate of 100% (or $1000L_a$) of containment air weight. Recent licensees have used their IPE calculations of containment fragility and factored-in the degraded containment capacity as part of Class 7 accident consequences. Recognizing the IP2 containment vulnerability, provide justification as to why the risk assessment should not postulate Class 7 accident for the requested extension of ILRT.

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From: Hansraj Ashar

Created By: HGA@nrc.gov

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JCP2 CC (James Pulsipher)

nrc.gov

owf4_po.OWFN_DO
PDM (Patrick Milano)

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