

August 6, 2002

Mr. Michael R. Kansler
Senior Vice President and
Chief Operating Officer
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 (IP2) - REQUEST FOR
ADDITIONAL INFORMATION (RAI) REGARDING SECTION 3.6
(CONTAINMENT SYSTEMS) OF THE IMPROVED TECHNICAL
SPECIFICATIONS (ITS) (TAC NO. MB4739)

Dear Mr. Kansler:

The Nuclear Regulatory Commission staff is reviewing your application for a license amendment dated March 27, 2002, to change the format and content of the current Technical Specifications (TSs) for the Indian Point Nuclear Generating Unit No. 2 (IP2) to be generally consistent with NUREG-1431, "Standard Technical Specifications Westinghouse Plants Technical Specifications," Revision 2, dated April 2001.

On the basis of our review of the changes proposed for Improved TS Section 3.6, "Containment Systems," we find that additional information identified in the Enclosure is needed.

We have discussed this with your staff and it was agreeable to your staff to respond to this RAI and provide comments within 60 days from receipt of this letter.

If you have questions regarding this letter or are unable to meet this response schedule, please contact me by phone on (301) 415-1441 or by electronic mail at gsv@nrc.gov.

Sincerely,

/RA/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosure: As stated

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
CONCERNING
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
IMPROVED TS REVIEW COMMENTS
ITS SECTION 3.6 CONTAINMENT SYSTEMS

3.6.0 General

3.6.0-1 DOC A.3 (Section 3.6.9)
DOC A.4 (Section 3.6.10)
DOC M.1 (Sections 3.8.2, 3.8.5, 3.8.8, and 3.8.10)
DOC L.1 (Sections 3.3.6, 3.3.7, and 3.7.10)
DOC R.27 (CTS 3.8.B.6, CTS 4.5.F, and STS 3.7.13)
DOC R.28 (CTS 3.8.B.8 and STS 3.9.4)
JFD CLB (Sections 3.6.1, 3.6.2, 3.6.3, 3.7.10, and 3.8.5)
JFD DB.1 (Sections 3.3.6, 3.3.7, 3.7.10, and 3.8.2)
JFD X.1 (Sections 3.3.6, 3.3.7, 3.6.9, and 3.6.10)
CTS 3.3.A.1, 3.3.C.1, 3.3.D.1, 3.3.H.1, 3.6.A.1, 3.8.B.6, 3.8.B.8, and 4.5.F
ITS 3.3.6, 3.3.7, 3.6.1, 3.6.2, 3.6.3, 3.6.9, 3.6.10, 3.7.10, 3.8.2, 3.8.5, 3.8.8,
3.8.10 and associated Bases.
STS 3.3.6, 3.3.7, 3.3.8, 3.6.1, 3.6.2, 3.6.3, 3.7.10, 3.7.13, 3.8.2, 3.8.5, 3.8.8,
3.8.10, 3.9.4, and associated Bases

NUREG-1431 "Standard Technical Specifications-Westinghouse Plants," Revision 2 was based on Technical Specifications Task Force (TSTF)-51, which allowed various components, systems, and structures to be inoperable during movement of recently irradiated fuel. "Recently irradiated fuel" is defined in the Standard Technical Specifications (STS)/TSTF-51 as irradiated "fuel that has occupied part of a critical reactor core within the previous [X] days" where X days has been determined by analysis that after sufficient radioactive decay has occurred, the offsite doses resulting from a fuel-handling accident (FHA) remain below the Standard Review Plan (SRP) limits (well within 10 CFR Part 100). A review of Improved Technical Specifications (ITS) 3.3, 3.6, 3.7, 3.8; and 3.9 shows that the STS Rev. 2/TSTF-51 changes are inconsistent and unacceptable in most areas. The changes made in ITS 3.8 seem to be in conformance with STS Rev. 2/TSTF-51 and thus would be acceptable. However, the changes made in the other ITS Sections specified above are not in conformance and thus are unacceptable. The changes made to ITS 3.3.6, 3.3.7, 3.7.10, and their associated Bases deleted "During movement of recently irradiated fuel assemblies" from the APPLICABILITY and the Bases. The changes made to the Bases for ITS 3.6.1, 3.6.2, and 3.6.3 added paragraphs discussing why these systems, components, structures, and surveillances (ITS Surveillance requirement (SR)3.6.3.7) were not required during MODES 5 and 6. In addition, Current Technical Specifications (CTS) 3.8.B.6, 3.8.B.8, and 4.5.F were relocated out of the CTS by DOCs R.27 and R.28. The justification used for all of these changes is that because Indian Point 2 cannot, and has committed to not move irradiated fuel until the reactor has been sub-critical for at least 100 hours, and the analysis used to determine the offsite doses resulting from an FHA showed that the doses are below Standard Review Plan (SRP) limits (well within 10 CFR Part 100), thus validating the 100 hours, and this analysis was reviewed and

Enclosure

found acceptable by the staff in Amendment No. 211, dated July 27, 2000. It is the Nuclear Regulator Commission (NRC) staff's position that STS Rev. 2/TSTF-51 did not allow or approve the removal of the "During movement of irradiated fuel assemblies" from the APPLICABILITY, it only allowed the addition of the word "recently," where "recently" is defined in the Bases as discussed above. Thus, the APPLICABILITIES would either be "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies." The NRC staff and the licensee cannot definitively state that the licensee would not move irradiated fuel prior to 100 hours. Plant conditions may require movement prior to 100 hours, or plant and industry design and operational changes may result in the ability to move irradiated fuel prior to 100 hours. In fact, the staff has received TSTF-51 amendment requests where recently is defined in the range of 24 hours to 3 days. The staff cannot accept TSs without some requirement or limitations during movement of irradiated fuel assemblies. Therefore, it is the staff's position that STS Rev. 2/TSTF-51 be implemented with no changes that is: 1) The APPLICABILITIES for ITS 3.3.6, 3.3.7, 3.7.10 and their associated Bases be modified to include either "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies;" 2) The Bases discussions in ITS 3.6.1, 3.6.2, and 3.6.3 be revised to require these systems, components, and structures be operable during movement of irradiated fuel assemblies or recently irradiated fuel assemblies in accordance with STS 3.9.4; 3) CTS 3.8.B.6, 3.8.B.8, and 4.5.F be retained in the ITS based on STS 3.3.8, 3.7.13, and 3.9.4; 4) ITS 3.6.9 and 3.6.10, because of their operability requirements associated with ITS 3.6.2 and 3.6.3, be reevaluated to determine if they need to be operable "During movement of irradiated fuel assemblies" or during movement of recently irradiated fuel assemblies; and 5) that the licensee commits to the guidelines specified in TSTF-51 Westinghouse Owners Group (WOG) Insert 0/STS B3.9.4 "Reviewer's Note." **Comment:** Comply with this staff position.

Entergy Reponse:

3.6.1 Containment

3.6.1-1 DOC A.1
 CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F, and 4.4.G
 ITS 5.5.14 and 5.5.15.

The markups of CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F, and 4.4.G show that the containment leakage requirements are relocated to ITS 5.5.15. ITS 5.5.15 is the "Battery Monitoring and Maintenance Program." The correct specification should be ITS 5.5.14 "Containment Leakage Rate Testing Program." See Comment Numbers 3.6.2-1, 3.6.3-1, and 3.6.10-3. **Comment:** Correct this discrepancy.

Entergy Response:

3.6.1-2 DOC A.3
 DOC LA.1
 CTS 1.7
 ITS B3.6.1 Bases - Background

CTS 1.7 defines CONTAINMENT INTEGRITY. A markup of CTS 1.7 shows that only CTS 1.7.b is relocated to ITS B3.6.1 Bases - Background and the relocation is justified by DOC LA.1. The rest of CTS 1.7 is covered by DOC A.3. DOC A.3 states that portions of CTS 1.7 are covered or relocated to other limiting conditions for operation (LCOs) in ITS 3.6 and that CONTAINMENT INTEGRITY is changed to containment shall be OPERABLE. DOC A.3 also states that this definition is deleted. While the former statements are correct and acceptable, the latter statement is incorrect. The definition is not deleted but is relocated to ITS B3.6.1 Bases - Background which makes this portion of the change a Less Restrictive (LA) change. See Comment Number 3.6.3.12. **Comment:** Revise the CTS markup and the discussions and justifications associated with DOC LA.1 to include the rest of CTS 1.7. Modify DOC A.3 accordingly. See Comment Number 3.6.3.12.

Entergy Response:

3.6.1-3 DOC L.1
 CTS 3.6.E
 ITS SR 3.0.1 and associated Bases

The CTS markup of CTS 3.6.E shows that this specification is deleted. This deletion is justified by DOC L.1. DOC L.1 states that this requirement is “Redundant to the requirements in ITS SR 3.0.1 for post maintenance testing that applies to all systems and components governed by Technical Specifications.” This makes the change an Administrative change rather than a Less Restrictive (L) change since the specification is relocated and encompassed by ITS SR 3.0.1. **Comment:** Revise the CTS markup to show this change as an Administrative change.

Entergy Response:

3.6.1-4 JFD CLB.1
 CTS 3.6.A.1
 ITS B3.6.1 Bases - Applicability and References
 STS B3.6.1 Bases - Applicability

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1

Entergy Response:

-
- 3.6.1-5 JFD DB.1
ITS B3.6.1 Bases - Applicable Safety Analyses and SR 3.6.1.1
ITS 5.5.14
STS B3.L.1 Bases - Applicable Safety Analyses and SR 3.6.1.1

STS B3.6.1 Bases - Applicable Safety Analysis and SR 3.6.1.1 are modified by Inserts B3.6.1-2-02 and B3.6.1-4-01, respectively. Inserts B3.6.1-2-02 and B3.6.1-4-01 use the exact same words and imply that the as left leakage prior to entering a MODE where containment integrity is required shall not exceed $0.75 L_a$ is for the Type A, B, and C tests. This is not in accordance with ITS 5.5.14 or the staff Safety Evaluation (SE) implementing 10 CFR Part 50 Appendix J Option B (Amendment 190 dated April 10, 1997) which specifies that the $0.75 L_a$ only applies to the Type A tests. The discussion also needs to address the Type B and C leakage rates. **Comment:** Revise the ITS markup to reflect the correct leakage rates for the Type A, B, and C tests.

Entergy Response:

-
- 3.6.1-6 CTS 3.6.A.3
ITS 3.6.1 Action A

See Comment Number 3.6.2-4 **Comment:** See Comment Number 3.6.2-4

Entergy Response:

-
- 3.6.1-7 CTS 4.4.A.2
ITS 5.5.14.c
ITS B3.6.1 Bases - Applicable Safety Analyses

See Comment Number 5.5.14-2. **Comment:** See Comment Number 5.5.14-2.

Entergy Response:

3.6.2 Containment Air Locks

- 3.6.2-1 DOC A.1
CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.C, 4.4.D, 4.4.F and 4.4.G
ITS 5.5.14 and 5.5.15

See Comment Number 3.6.1-1. **Comment:** See Comment Number 3.6.1-1.

Entergy Response:

3.6.2-2 DOC A.8
 DOC M.2
 CTS 3.6.A.1.d and 3.6.A.3
 ITS 3.6.2 Required Actions A.1 and B.1 Note 1 and associated Bases.

CTS 3.6.A.3 is modified by the addition of Required Actions (RA) A.1, and B.1 and associated Note 1 to both RAs. These changes are justified by DOCs M.2 and A.8, respectively. RA A.1/B.1 Note 1 directs the operator to enter Condition C if both doors in an air lock are inoperable. Condition C requires immediate action to evaluate the containment leakage rate, verify an air lock door is closed within 1 hour and restore the air lock to OPERABLE status within 24 hours. The corresponding actions in the CTS would be verify containment leakage rate and restore the air lock to OPERABLE status within 4 hours (CTS 3.6.A.3), which would be the same action if one air lock door were inoperable. Thus, the addition of RA A.1/B.1 Note 1 is a More Restrictive change since it directs the operator to a More Restriction action and the addition of RA A.1 and B.1 are classified in the CTS markup as More Restrictive changes (DOC M.2). **Comment:** Revise the CTS markup and provide a justification and discussion on this More Restrictive change.

Entergy Response:

3.6.2-3 DOC A.11
 CTS 1.7.c, 3.6.A.1.d and 3.6.A.3
 ITS 3.6.2 ACTION Note 2 and associated Bases

CTS 3.6.A.3 is modified to add ITS 3.6.2 ACTION Note 2 which specifies separate condition entry is allowed for each air lock. This change is characterized as an Administrative change (DOC A.11). DOC A.11 states that the change is considered Administrative since this allowance is consistent with an unstated assumption in the CTS. The wording of CTS 1.7.c, 3.6.A.1.d, and 3.6.A.3 does not seem to allow for separate condition entry, and the staff cannot determine how this can be concluded from the CTS. Thus, the staff considers this change to be a Less Restrictive (L) change. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

Entergy Response:

3.6.2-4 DOC M.2
 DOC M.4
 DOC M.6
 CTS 3.6.A.3
 ITS 3.6.1 ACTION A
 ITS 3.6.2 RA A.1, B.1, C.2 and associated Bases

CTS 3.6.A.3 is modified by the addition of ITS 3.6.2 RA A.1, B.1, and C.2 which requires that an air lock door is verified closed within 1 hour. This change is characterized as a

More Restrictive change (DOC M.2) since CTS 3.6.A.3 would require this be done within 4 hours. DOC M.2 states the following under “Justification for Change”: “This action must be completed within 1 hour. This specified time period is consistent with the Actions of LCO 3.6.1 which requires containment be restored to Operable status within 1 hour.” ITS 3.6.1 ACTION A requires the containment be restored to OPERABLE status within 4 hours consistent with CTS 3.6.A.3. DOC M.4 states the following in “Description of Change”: “CTS 3.6.A.3 specifies that... containment integrity shall be restored within 4 hours. Under the same conditions, ITS 3.6.2 Required Actions A.1 and B.1 maintain this requirement (See ITS 3.6.2 DOCs M.1 and M.2)....” **Comment:** Correct this discrepancy by providing additional discussions and justifications for this change if it is considered a More Restrictive change (1-hour Completion Time), if it is considered an Administrative change (maintains a 4-hour Completion Time or modify the Completion Time for ITS 3.6.1 ACTION A to 1 hour (a More Restrictive change). Revise the CTS/ITS accordingly. See Comment Number 3.6.1.6.

Entergy Response:

3.6.2-5 JFD CLB
ITS B3.6.2 Bases - Applicable Safety Analyses, LCO, and Applicability
STS B3.6.2 Bases - Applicable Safety Analyses, LCO, and Applicability

STS B3.6.2 Bases - Applicable Safety Analyses, LCO, and Applicability are modified by Inserts B3.6.2-2-01, B3.6.2-2-02, and B3.6.2-2-03, respectively. These Inserts in the ITS markup are designated as Justification for Differences (JFD) CLB changes. The JFD section ITS 3.6.2 does not contain a JFD CLB discussion and justification. See Comment Numbers 3.6.2-6, 3.6.2-7 and 3.6.2-8 . **Comment:** Provide a discussion and justification for these JFD CLB changes. See Comment Numbers 3.6.2-6, 3.6.2-7, and 3.6.2-8.

Entergy Response:

3.6.2-6 JFD CLB
ITS B3.6.2 Bases - Applicable Safety Analyses, Applicability, and References
STS B3.6.2 Bases - Applicable Safety Analyses and Applicability

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

Entergy Response:

3.6.2-7 JFD CLB
CTS 4.4.C
ITS B3.6.2 Bases - LCO
STS B3.6.2 Bases - LCO

STS B3.6.2 Bases - LCO is modified by Insert B3.6.2-2-02 which describes the air lock testing performed when air lock doors are opened when containment integrity is required. Insert B3.6.2-2-02 seems to differ from the requirements specified in CTS 4.4.C, the Safety Evaluation implementing 10 CFR Part 50 Appendix J Option B (Amendment 190 dated April 10, 1997) and 10 CFR Part 50 Appendix J. **Comment:** Provide a discussion and justification for this difference.

Entergy Response:

3.6.2-8 JFD CLB
CTS 4.4.C.2
ITS B3.6.2 Bases - LCO
ITS 5.5.14
STS B3.6.2 Bases - LCO

STS B3.6.2 Bases - LCO is modified by Insert B3.6.2-2-02 which describes the airlock testing performed when air lock doors are opened. CTS 4.4.C.2 also describes the airlock testing performed when airlock doors are opened. The CTS markup shows CTS 4.4.C.2 as being contained in ITS 5.5.14 (See Comment Numbers 3.6.1-1 and 3.6.2-1). This is not entirely correct. This statement is also contained in Insert B3.6.2-2-02, which means this is also a Less Restrictive (LA) change. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (LA) change.

Entergy Response:

3.6.2-9 JFD PA.1
ITS B3.6.2 Bases - C.1, C.2 and C.3
STS B3.6.2 Bases - C.1, C.2 and C.3

The third paragraph, first sentence of STS B3.6.2 Bases C.1, C.2, and C.3 is modified in ITS B3.6.2 Bases C.1, C.2, and C.3 by the addition of "unless Condition C is exited in accordance with LCO 3.0.2 (one door is made OPERABLE)" at the end of the sentence. This addition is not entirely correct. Entry into Condition C may not necessarily be for inoperable airlock doors or interlock mechanism. Returning one inoperable airlock door to Operable status would not allow one to exit Condition C per LCO 3.0.2 since the ITS LCO 3.6.2 "Two containment airlocks shall be OPERABLE" with both airlock doors Operable will not be met. In addition, RA C.3 requires that the airlock be restored to Operable status, not just one airlock door. Furthermore, this addition is unnecessary since ITS LCO 3.0.2 is valid throughout the ITS and there is no need to specify it here. **Comment:** Delete this addition.

Entergy Response:

3.6.3 Containment Isolation Valves

3.6.3-1 DOC A.1
CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.D.2.a,
ITS 5.5.14 and 5.5.15

See Comment Number 3.6.1-1. **Comment:** See Comment Number 3.6.1-1.

Entergy Response:

3.6.3-2 DOC A.11
DOC M.2
CTS 3.0.1
CTS 3.6.A.3.a
ITS 3.6.3 Required Action B.1, ACTION E and associated Bases

CTS3.6.A.3.a is modified by the addition ITS 3.6.3 RA B.1. This change is justified by DOCs A.11 and M.2. DOC M.2 describes the change with respect to the pressure relief line isolation valves, but also discusses penetrations with two containment isolation valves inoperable. DOC A.11 also discusses penetrations with two inoperable containment isolation valves. The discussions state that with two or more inoperable containment isolation valves the CTS defaults to CTS 3.0.1 which is equivalent to ITS 3.6.3 RA B.1 and ACTION E; i.e., the reactor must be in hot shutdown (MODE 3) within 7 hours and cold shutdown (MODE 5) within 37 hours. Thus, this portion of the change is Administrative. This is incorrect. The change is a More Restrictive change. Granted the time to reach hot shutdown (MODE 3) in the CTS and ITS is the same 7 hours. However, in ITS RA B.1, the operator has one (1) hour to isolate the penetration or shutdown. In the CTS there is no requirement to isolate the penetration; in this situation (2 or more inoperable valves); isolation could occur at any time up to 6 hours and 59 minutes after discovery. **Comment:** Revise the CTS markup and provide a discussion and justification for this More Restrictive change.

Entergy Response:

3.6.3-3 DOC M.4
DOC L.3
CTS 3.6.A.1.a and 3.6.A.2.b
ITS 3.6.3 ACTION Note 1, SR 3.6.3.1, SR 3.6.3.7, and associated Bases

CTS 3.6.A.1.a is modified to become ITS 3.6.3 ACTION Note 1, which allows containment isolation valves except for the 36-inch purge valve to be un-isolated intermittently under administrative controls. The changes are justified by DOCs M.4 and L.3. ITS 3.6.3 Action Note 1 conflicts with CTS 3.6.A.2.b and ITS SR 3.6.3.1, SR 3.6.3.7 and the associated Bases which allows or implies that the 36-inch purge valves can be opened intermittently. See Comment Numbers 3.6.3-4, 3.6.3-5, 3.6.3-7, and 3.6.3-8. **Comment:** Correct the discrepancy. See Comment Numbers 3.6.3-4, 3.6.3-5, 3.6.3-7, and 3.6.3-8.

Entergy Response:

3.6.3-4 DOC M.4
 DOC L.3
 JFD PA.1
 CTS 3.6.A.1.a
 ITS 3.6.3 ACTION Note 1 and associated Bases
 STS 3.6.3 ACTION Note 1 and associated Bases

CTS 3.6.A.1.a and STS 3.6.3 ACTION Note 1 are modified to become ITS 3.6.3 ACTION Note 1, which allows containment isolation valves except for the 36-inch purge valves to be un-isolated intermittently under administrative controls. See Comment Number 3.6.3-3. The changes are justified by DOCs M.4 and L.3 and JFD PA.1. The STS Bases discussion for STS 3.6.3 Action Note 1 is modified by an Insert. STS page B3.6.3-4 shows that the insert is Insert B3.6.3-4-02, but the NUREG-1431 Markup Insert page does not show an insert B3.6.3-4-02. It does show two inserts labeled "Insert B3.6.3-4-01." It is assumed that the second Insert B3.6.3-4-01 on this page is Insert B3.6.3-4-02. See Comment Numbers 3.6.3-5, and 3.6.3.6. **Comment:** Correct this discrepancy. See Comment Numbers 3.6.3-3, and 3.6.3-5, and 3.6.3-6.

Entergy Response:

3.6.3-5 DOC M.4
 DOC L.3
 JFD PA.1
 CTS 3.6.A.1.a
 ITS 3.6.3 ACTION Note 1 and associated Bases
 STS 3.6.3 ACTION Note 1 and associated Bases

CTS 3.6.A.1.a and STS 3.6.3 ACTION Note 1 are modified to become ITS 3.6.3 ACTION Note 1 which allows containment isolation valves except for the 36-inch purge valves to be un-isolated under administrative controls. See Comment Number 3.6.3-3. The changes are justified by DOCs M.4 and L.3 and JFD PA.1. The STS Bases discussion for STS 3.6.3 ACTION Note 1 is modified by Insert B3.6.3-4-01/B3.6.3-4-02 (See Comment Number 3.6.3-4), which states that "This allowance applies to both containment isolation valves that are normally closed and inoperable automatic isolation valves that are closed to meet Required Actions of this LCO." This statement conflicts with the requirements of CTS 3.6.A.1.a, is too restrictive and does not meet the intent of the Note. The Note allows any containment isolation valve (manual, automatic, deactivated automatic, etc.) that is closed as a result of the Action statements or that is normally closed during plant operation to be opened intermittently. The insert would limit the valves that could be opened to only those normally closed during plant operation and inoperable automatic valves closed as a result of the Action statements.

Any manual valve, check valve with the flow through the valve secured or blind flange closed due to meet the Action statements would not be allowed to be opened. See Comment Number 3.6.3-6. **Comment:** Delete this statement. See Comment Numbers 3.6.3-3, 3.6.3-4, and 3.6.3-6.

Entergy Response:

3.6.3-6 DOC M.4
 DOC L.3
 JFD PA.1
 CTS 3.6.A.1.a
 ITS 3.6.3 ACTION Note 1 and associated Bases
 STS 3.6.3 ACTION Note 1 and associated Bases

CTS 3.6.A.1.a and STS 3.6.3 ACTION Note 1 are modified to become ITS 3.6.3 Action Note 1 which allows containment isolation valves except for the 36-inch purge valves to be un-isolated under administrative controls. See Comment Number 3.6.3-3. The changes are justified by DOCs M.4 and L.3 and JFD PA.1. DOC M.4 states that the IP2 Bases provides additional clarification as to when a dedicated operator is needed and his location with respect to control room operation of a valve. Insert B3.6.3-5-01 in the Bases provides this explanation; however the insert is in the wrong place. It has been inserted between the ITS Bases discussion of ITS 3.6.3 Action Note 2 and Note 3. It should be placed with the discussion for Note 1. **Comment:** Revise the ITS Base markup to correct this error. See Comment Number 3.6.3-3.

Entergy Response:

3.6.3-7 DOC M.7
 JFD CLB
 CTS 3.6.A.2.b
 ITS SR 3.6.3.1 and associated Bases
 STS SR 3.6.3.1 and associated Bases

CTS 3.6.A.2.b and STS SR3.6.3.1 are modified to become ITS SR 3.6.3.1 which verifies that the 36-inch containment purge valves are sealed closed except for specific reasons. This change is justified by DOC M.7. ITS SR 3.6.3.1 maintains the STS requirement that the purge valves be "sealed closed." However, the STS Bases discussion on why the purge valves need to be sealed closed in STS B3.6.3 Bases - Applicable Safety Analyses and LCO is deleted. The intent of the STS requirement of sealing closed the valve is to ensure that the valve will not be opened for any reason during operation since they may be unable to close during or following a loss-of-coolant accident (LOCA). Since CTS 3.6.A.2.b and ITS SR 3.6.3.1 allow these valves to be opened for specific reasons, there is no need or CTS requirement to seal the valves closed. See Comment Number 3.6.3-3. **Comment:** Revise the ITS markup to delete the word "sealed."

Entergy Response:

-
- 3.6.3-8 DOC M.7
 JFD CLB
 CTS 3.6.A.2.a and 3.6.A.2.b
 ITS SR 3.6.1, SR 3.6.3.2, SR 3.6.3.7 and associated Bases
 STS SR 3.6.3.1 and associated Bases

CTS 3.6.A.2.b and STS SR 3.6.3.1 are modified to become ITS SR 3.6.3.1 which verifies that the 36-inch containment purge valves are sealed closed except for specific reasons. This change is justified by DOC M.7. ITS SR 3.6.3.1 maintains the STS requirement that the purge valve be "sealed closed." However, the STS Bases discussion on why the purge valves need to be sealed closed in STS B3.6.3 Bases - Applicable Safety Analyses and LCO is deleted. See Comment Number 3.6.3-7. Part of the STS B3.6.3 Bases - LCO discussion deals with blocking the valves from fully opening so they can automatically close on an actuation signal. This discussion defines what constitutes an OPERABLE purge valve. Since the 36-inch containment purge valves and the containment pressure relief isolation valves are allowed to be opened during plant operation (CTS 3.6.A.2.b, ITS 3.6.3 ACTION Note 1, ITS SR 3.6.3.1 and ITS SR 3.6.3.2), are blocked from fully opening (CTS 3.6.A.2.a and ITS SR 3.6.3.7) and are automatic valves (CTS 3.6.A. 2.b and ITS Bases discussions), the sentences in STS B3.6.3 Bases - LCO dealing with blocking the valves and automatic actuation of the blocked cannot be deleted. **Comment:** Revise the ITS markup to include this information.

Entergy Response:

-
- 3.6.3-9 DOC M.9
 DOC LA.3
 CTS 3.6.A.2.a and Table 4.1-3
 ITS SR 3.6.3.5, SR 3.6.3.7 and associated Bases

CTS Table 4.1-3 is modified by the addition of ITS SR 3.6.3.5 which verifies the isolation time of containment isolation valves. This change is justified by DOC M.9. DOC M.9 discusses the isolation times for the containment purge valves and pressure relief isolation valves and refers the reviewer to DOC LA.3 for additional information. DOC LA.3 relocates the isolation times for these valves specified in CTS 3.6.A.2.a to the Updated Final Safety Analysis Report (UFSAR). All these changes are acceptable; however, DOC LA.3 states that the ITS SR that verifies valve isolation time is ITS SR 3.6.3.7 rather than ITS SR 3.6.3.5. **Comment:** Correct this discrepancy.

Entergy Response:

-
- 3.6.3-10 DOC L.4
 CTS 4.4.E
 ITS SR 3.0.1

The CTS markup shows that CTS 4.4.E as being deleted, and justifies the deletion by DOC L.4. DOC L.4 states that the requirements of CTS 4.4.E are redundant to the requirements of ITS SR 3.0.1 and thus the requirements of CTS 4.4.E are maintained in the ITS. This justification justifies an Administrative change - relocation of CTS requirements to another ITS section. **Comment:** Revise the CTS markup and DOC L.4 to show that this change is an Administrative change rather than a Less Restrictive (L) change.

Entergy Response:

3.6.3-11 DOC L.6
 CTS 3.6.A.4 and 4.4.D.3

The CTS markup of CTS 3.6.A.4 and 4.4.D.3 shows that these requirements are deleted and are justified by DOC L.6. DOC L.6 only addresses the deletion of CTS 4.4.D.3. **Comment:** Provide a discussion and justification for the deletion of CTS 3.6.A.4.

Entergy Response:

3.6.3-12 DOC LA.2
 CTS 1.7.a and 3.6.A.1.a
 ITS SR 3.6.3.3, SR 3.6.3.4, and associated Bases

The CTS markup of CTS 1.7.a and 3.6.A.1.a shows that these requirements - manual valves required to be closed during operation are closed and blind flanges installed where required - as encompassed by ITS LCO 3.6.3 requirement that containment isolation valves shall be Operable and the details of what constitutes Operability for the non-automatic valves is relocated to the Bases of ITS 3.6.3, and justified by DOC LA.2. This justification is incomplete and misleading. Both CTS 1.7.a and 3.6.A.1.a are the basis for ITS SR 3.6.3.3 and SR 3.6.3.4 which makes this portion of the change an Administrative change. In addition, this information is also relocated to ITS B3.6.1 Bases - Background (See Comment Number 3.6.1-2). **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for these Administrative and Less Restrictive (LA) changes. See Comment Number 3.6.1-2.

Entergy Response:

3.6.3-13 DOC LA.3
 CTS 3.6.A.3.a.2.(b) and associated Note 3)

CTS 3.6.A.3.a.2.(b) specifies that with one or more inoperable containment isolation valves one of the remedial actions is to isolate the affected penetration within 4 hours using at least one deactivated automatic isolation valve secured in the isolation position. This requirement is supplemented by associated Note 3) which states that "This may be

the valve previously maintained operable per 3.a.l above or the valve initially declared inoperable.” The CTS markup shows the Note being relocated and justified by DOC LA.3. DOC LA.3 only discusses the relocation of the closing times for the containment purge isolation valves and pressure relief isolation valves. See Comment Number 3.6.3-14. **Comment:** Provide a discussion and justification for this Less Restrictive (L/LA) change. See Comment Number 3.6.3-14.

Entergy Response:

3.6.3-14 DOC LA .3
 DOC LA .4
 CTS 1.7.d, 3.6.A.1.b, 3.6.A.3.a.2.(b) and associated Note 3), and 3.6.A.3.a.2.(d)
 ITS B3.6.3 Bases - A.1 and A.2, B.1, and C.1 and C.2.
 STS B3.6.3 Bases - A.1 and A.2, B.1, and C.1 and C.2

CTS 1.7.d, 3.6.A.1.b, 3.6.A.3.a.2.(b) and associated Note 3), and 3.6.A.3.a.2.(d) specify that manual valves, blind flanges and automatic valves used to isolate automatic containment isolation valve penetrations shall meet the same design criteria as the penetration isolation valve. In the CTS markup, this requirement in CTS 1.7.d, 3.6.A.1.b, and 3.6.A.3.a.2.(d) is being relocated per DOC LA.4 to the Bases for ITS 3.6.3. The ITS Bases markup for ITS 3.6.3 shows that this requirement has been relocated to ITS B3.6.3 Bases - A.1, and A.2, and B.1. This requirement is not included in the ITS markup for ITS B3.6.3 Bases - C.1 and C.2. The STS does not specify or require that the valves used to isolate inoperable containment penetrations meet the same design criteria as the containment isolation valves. The ITS maintains the CTS requirement in ITS 3.6.3 ACTIONS A and B, but tries to take advantage of the less restrictive STS requirement in ITS 3.6.3 ACTION C. This Less Restrictive (L) change for ITS 3.6.3 Action C has not been justified. The staff recommends that the less restrictive STS requirement be applied to ITS 3.6.3 ACTIONS A, B, and C. See Comment Number 3.6.3-13. **Comment:** Revise the CTS/ITS markups to be consistent and provide the appropriate discussions and justification to either maintain the Less Restrictive (LA) CTS requirement or use the Less Restrictive (L) STS requirement. See Comment Number 3.6.3-13.

Entergy Response:

3.6.3-15 DOC R.16
 CTS 4.4.D.2.b
 Indian Point 3 ITS 3.6.3 ACTION D, SR 3.6.3.10 and associated Bases
 NUREG-1433/1434 STS 3.6.1.3 ACTION D, SR 3.6.1.3.14 (NUREG-1433),
 SR 3.6.1.3.11 (NUREG-1434) and associated Bases.

See Comment Numbers 3.6.3-22 and 4.4.D.2.b-1. **Comment:** See Comment Numbers 3.6.3-22 and 4.4.D.2.b-1.

Entergy Response:

3.6.3-16 JFD CLB
ITS B3.6.3 Bases - Applicable Safety Analyses and Applicability
STS B3.6.3 Bases - Applicable Safety Analyses and Applicability

STS B3.6.3 Bases - Applicable Safety Analyses and Applicability are modified by Inserts B3.6.3-3-01 and B3.6.3-4-01, respectively. These inserts in the ITS markups are designated as JFD CLB changes. The Justification for Differences Section for ITS 3.6.2 does not contain a JFD CLB discussion and justification. See Comment Number 3.6.3-17. **Comment:** Provide a discussion and justification for these JFD CLB changes. See Comment Number 3.6.3-17.

Entergy Response:

3.6.3-17 JFD CLB
ITS B3.6.3 Bases - Applicable Safety Analyses, Applicability, SR 3.6.3.7 and References
STS B3.3.3 Bases - Applicable4 Safety Analyses, Applicability, and SR 3.6.3.7.

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

Entergy Response:

3.6.3-18 JFD PA.1
ITS B3.6.3 Bases - Applicable Safety Analyses
STS B3.6.3 Bases - Applicable Safety Analyses

STS B3.6.3 Bases - Applicable Safety Analyses is modified by INSERT B3.6-3-02 which defines the term sealed closed valves and sealed closed barriers. While the staff does not seem to have a problem with the definition of sealed closed valves, sealed closed barriers is not a normally defined term from the staff's point of view, is confusing and does not meet the intent of valve and penetration isolation. In particular, the statement that "closed automatic valves which remain closed after a loss of coolant accident" is unacceptable. The ITS requires that closed automatic valves used for penetration isolation be deactivated. In addition, normally closed automatic containment isolation valves are also deactivated. The sealed barrier definition would allow closed activated automatic valves. In addition, the statement "Sealed closed barriers may be used in place of any automatic isolation valve" does not connote leak tightness. There may be penetrations normally isolated by sealed closed barriers that are required to be leak tight. This is not discussed. **Comment:** Delete this change.

Entergy Response:

3.6.3-19 CTS 4.4.D.2.b and Table 4.4-1 Notes 5 and 6

CTS 4.4.D.2.b specifies the surveillance and criteria for the service water isolation valve leakage system. Table 4.4-1, Note 6 indicates which containment isolation valves are sealed by the service water isolation valve leakage system. See Comment Numbers 3.6.3-15 and 4.4.D.2.b-1 for retention of this surveillance. Table 4.4-1, Note 5 indicates that certain containment isolation valves in the Residual Heat Removal (RHR) System are sealed by the RHR system fluid. It seems logical that the SR required by Comment Number 4.4.D.2.b-1 should also include the hydrostatic leakage tests for the RHR containment isolation valves. See Comment Number 3.6.3-22. **Comment:** Revise the CTS/ITS markups and provide the appropriate discussions and justifications to address this concern. See Comment Numbers 3.6.3-15, 3.6.3.22, and 4.4.D.2.b-1.

Entergy Response:

3.6.3-20 CTS Table 4.1-3 Item 5
ITS SR 3.6.3.6 and associated Bases

CTS Table 4.1-3, Item 5 requires the automatic actuation of the Containment Isolation System on a 24-month frequency. The corresponding ITS SR is ITS SR 3.6.3.6. While the CTS phrase “automatic actuation” can be interpreted to mean “an actual or simulated actuation signal,” the CTS seems explicit in that all automatic containment isolation valves must be tested. The ITS exempts valves which are locked, sealed or otherwise secured in position. Thus, the ITS is Less Restrictive than the CTS. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

Entergy Response:

3.6.3-21 CTS Table 4.4-1
ITS B3.6.3 Bases - LCO and References
STS B3.6.3 - Bases - LCO

The third paragraph of STS B3.6.3 Bases - LCO deals with those containment isolation valves that are required to be closed during an accident and are in the closed position during normal operation. The last sentence in this paragraph states that these passive isolation valves/devices are listed in a plant-specific document(s). This sentence has been deleted from ITS B3.6.3 Bases - LCO. Since ITS changes to the STS Bases were made based on changes to the STS, on plant-specific system design, on current licensing basis as specified in the CTS or for editorial reasons, the deletion does not seem to fall into any of these categories. This statement directs the operator/inspector to those documents which list these passive devices similar to the document that lists the automatic valves. In addition, it would seem that some, if not all of these valves are listed in Table 4.4-1 which is being relocated per DOC LA.1 to the UFSAR. The staff

requires that this statement be retained. **Comment:** Revise the ITS markup to retain this statement modified to include specific plant documents containing the listing of the passive isolation valves/devices or if the listing of the documents is extensive, a general description of the type of documents.

Entergy Response:

3.6.3-22 ITS 3.6.3 ACTION D, SR 3.6.3.8 and associated Bases
ITS B3.6.3 Bases - LCO
STS B3.6.3 Bases - LCO

The fourth paragraph of STS 3.6.3 Bases - LCO states the following: "Purge valves with resilient seals [secondary containment bypass valves] must meet additional leakage rate requirements. The other containment isolation valve leakage rates are addressed by LCO 3.6.1 "Containment," as Type C testing." This paragraph has been deleted from ITS B3.6.3 Bases - LCO. Since ITS changes to the STS Bases were made based on changes to the STS, on plant-specific system design, on current licensing basis as specified in the CTS or for editorial reasons, the deletion, except for the purge valve portion, does not seem to fall into any of these categories. This paragraph discusses the reason for the specific STS/ITS leakage SRs in STS/ITS 3.6.3 and specifies which specification controls the leakage requirements - STS/ITS 3.6.3 for specific leakage criteria and STS/ITS for Type C testing. Since ITS 3.6.3 includes ACTION D, SR 3.6.3.8 and additional leakage SRs required by Comment Numbers 3.6.3-15, 3.6.3-19, and 4.4.D.2.b-1, this STS paragraph modified to take into account the plant special design needs to be retained. See Comment Number 3.6.3-24 for concerns on ITS SR 3.6.3.8. **Comment:** Revise the ITS markup to retain this STS paragraph as modified by the plant-specific design. See Comment Numbers 3.6.3-15, 3.6.3-19, 3.6.3-24, and 4.4.D.2.b-1.

Entergy Response:

3.6.3-23 ITS B3.6.3 Bases - D.1

ITS B3.6.3 Bases - D.1 has the following statement at the very end: "The 24 hour Completion Time for purge valve leakage... does not exist." Since the ITS does not have a specific purge valve leakage requirement per the SE for Amendment 190 dated April 10, 1997, this statement is not valid for ITS B3.6.3 Bases - D.1. **Comment:** Delete this statement.

Entergy Response:

3.6.3-24 CTS 4.4.D
ITS 3.6.3 ACTION D, SR 3.6.3.8 and associated Bases
STS 3.6.3 ACTION D, SR 3.6.3.7, SR 3.6.3.11 and associated Bases

NUREG-1431 STS 3.6.3 ACTION D, SR 3.6.3.7, SR 3.6.3.11 and similar ACTIONS and SRs in the other NUREGs were added to the containment isolation valve specification because certain containment isolation valves had additional leakage rate requirements beyond those specified for 10 CFR Part 50 Appendix J. These requirements were placed in STS 3.6.3 because it was considered the more appropriate location given that it specified the valves and penetrations, rather than in STS 3.6.1. The ITS markup of STS 3.6.3 ACTION D and SR 3.6.3.11 modifies the wording by substituting "containment" for "shield" and deleting the word "bypass." Similar changes were made throughout the Bases. In Indian Point 3 (IP3), the corresponding ACTION and SR(ITS 3.6.3. ACTION D and SR 3.6.3.9) did not delete the word "bypass." No justification is provided for the deletion of the word "bypass" or the difference between two virtually similar plants. However, from the CTS markup of CTS 4.4.D, it would seem that ITS SR 3.6.3.8 is an attempt to include the 10 CFR Part 50 Appendix J, Type B and C leakage rate test as part of ITS 3.6.3. If this is the case, the proposed change causes confusion since it will conflict with STS/ITS 3.6.1, 3.6.3 ACTION Note 4, and 5.5.16/14. In addition, this change would be considered as a generic change which would be a beyond scope of review item for this conversion. If it is indeed a bypass leakage rate surveillance, similar to IP-3, then ITS 3.6.3 ACTION D, SR 3.6.3.8 and the associated Bases need to be revised to reflect this design. **Comment:** Revise the CTS/ITS markup as appropriate and provide the appropriate discussions and justifications for this change.

Entergy Response:

3.6.5 Containment Air Temperature

3.6.5-1 DOC M.2
 JFD DB.1
 JFD PA.1
 ITS B3.6.5 Bases - SR 3.6.5.1
 STS B3.6.5A Bases - SR 3.6.5A.1

STS B3.6.5A Bases - SR 3.6.5A.1 states the following: "In order to determine the containment average air temperature, an arithmetic average is calculated... atmosphere." ITS B3.6.5 Bases - SR 3.6.5.1 deletes this STS sentence and replaces it with Insert B3.6.5-3-01. DOC M.2 which adds ITS SR 3.6.5.1 to the CTS states that the Bases is modified to "clarify that the containment average air temperature is an arithmetic average that is calculated using measurements taken at locations within the containment...." Insert B3.6.5-3-01 does state that more containment locations may be used to monitor the containment temperature but it does not state that an arithmetic average will be used. The statement implies that any method could be used to determine or calculated the containment average temperature. **Comment:** Revise ITS B3.6.5 Bases-SR 3.6.5.1 to be consistent with the statements in DOC M.2.

Entergy Response:

3.6.6 Containment Spray System and Containment fan Cooler Unit (FCU) System

- 3.6.6-1 DOC M.3
 CTS 3.3.B.2.a and 3.3.B.2.b
 ITS 3.6.6 Required Actions A.1 and C.1 and associated Bases

CTS 3.3.B.2.a and 3.3.B.2.b specify the actions to take during normal reactor operation for an inoperable FCU and containment spray pump, respectively. The CTS markup of CTS 3.3.B.2.b shows that the words "During normal reactor operation" are changes to MODES 1, 2, 3, and 4, and is justified by DOC M.3. No such change is shown or justified in CTS 3.3.B.2.a. Since both CTS actions are converted to the same ITS LCO, the changes should be consistent. **Comment:** Revise the CTS markup of CTS 3.3.B.2.a to be consistent with CTS 3.3.B.2.b and provide a discussion and justification for this More Restrictive change.

Entergy Response:

-
- 3.6.6-2 DOC M.5
 CTS 4.5.B
 ITS SR 3.6.6.1 and associated Bases
 STS SR 3.6.6A.1 and associated Bases

CTS 4.5.B is modified by the addition of ITS SR 3.6.6.1 and justified by DOC M.5. While the addition of ITS SR 3.6.6.1 is acceptable, changes made to the associated Bases are questionable. STS B3.6.6A Bases - SR 3.6.6A.1 states the following: "Rather, it involves verification, through a system walkdown, that those valves outside containment (only check valves are inside containment) and capable of potentially being mispositioned are in the correct position." ITS B3.6.6 Bases - SR 3.6.6.1 modifies this sentence by deleting the words "outside containment (only check valves are inside containment)." No specific justification for this deletion is provided. The proposed change would require that all valves both inside and outside containment be verified to be in the correct position through a system walkdown. Unless the valves inside containment are either check valves (like stated in the STS), are all locked, sealed or secured in position, or a combination of check and locked, sealed or secured valves, a system walkdown inside containment would be required, which would be undesirable. **Comment:** Provide a discussion and justification for this change and/or Revise the ITS Bases as necessary.

Entergy Response:

-
- 3.6.6-3 DOC M.8
 CTS 4.5.B.1
 ITS SR 3.6.6.5, SR 3.6.6.6 and associated Bases

CTS 4.5.B.1 specifies that the Containment Spray System system test shall be performed except that the isolation valves in the spray supply lines at the containment are blocked closed. The ITS breaks this CTS surveillance into two surveillances - ITS SR 3.6.6.5 and SR 3.6.6.6. ITS SR 3.6.6.5 verifies that each automatic containment spray valve that is not locked, sealed or otherwise secured in position actuates to its

correct position on an actuation signal. It is implied from CTS 4.5.B.1, DOC M.8 and the ITS Bases, that these blocked valves are automatic valves, but it is not clear. If they are manual valves there is no problem. However, if these valves are automatic, then there is the concern as to when these valves will be tested per ITS SR 3.6.6.5 since the locked, sealed, and secured exception in the SR could result in the valves never being tested for this SR. The exception from testing of locked, sealed or otherwise secured valves was only intended to apply to those valves that during normal operating conditions are locked, sealed, or otherwise secured in position. It is also implied by DOC M.8 that ITS SR 3.6.6.5 and SR 3.6.6.6 would be performed independent of each other and this may not be the case nor is it required by the ITS. **Comment:** Specify whether these blocked valves are manual or automatic. If automatic, discuss when and how this valve will be tested in accordance with ITS SR 3.6.6.5.

Entergy Response:

3.6.6-4 DOC L.1
 CTS 3.3.B.2
 ITS 3.6.6 ACTIONS, 3.6.7 ACTIONS and associated Bases

CTS 3.3.B.2 specifies that during power operation any one of the following components may be inoperable: One containment spray system, one fan cooler or the re-circulation fluid pH control system. The CTS markup shows this requirement as being modified to allow any combination of the above components to be inoperable in converting to ITS 3.6.6 and 3.6.7 ACTIONS. This change is justified by DOC L.1. DOC L.1 is incorrect. The DOC summary states the following: "Allows the containment spray system or the fan cooler units to be inoperable regardless of the Operability status of the re-circulation pH control system." The rest of the justification elaborates on this sentence. The discussion does not address the CTS inoperability requirement of an inoperable containment spray and an inoperable FCU which the ITS would allow. **Comment:** Revise the discussion and justification of this Less Restrictive (L) change to address all the inoperability combinations allowed by the ITS.

Entergy Response:

3.6.6-5 DOC L.2
 CTS 3.3.B.2
 ITS 3.6.6 Required Action B.2 and associated Bases

CTS 3.3.B.2 requires that after HOT SHUTDOWN (MODE 3) is reached, the action is to restore the inoperable subsystem to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the next 30 hours. This requirement is changed in the CTS markup to MODE 5 in 84 hours for the Containment Spray System. This modification is justified by DOC L.2. The corresponding ITS ACTION is ITS 3.6.6 Required Action B.2, which requires the plant to be in MODE 5 within 84 hours. Even though the overall time to complete the CTS and ITS ACTIONS of 84 hours does not change (CTS 6 to MODE 3 + 48 + 30 = 84 hours), there is a change in converting the CTS to the ITS. This change relates to when the commencement of shutting down to MODE 5 begins or is declared. In the CTS, it officially starts immediately after the 48-hour allowed outage

time to restore the subsystem to OPERABLE status is completed. In the ITS, it starts immediately after MODE 3 is reached. This change is not indicated or justified in the CTS markup for CTS 3.3.B.2. The change is a More Restrictive change (Time for commencement of shutdown to MODE 5 is declared earlier in ITS versus CTS).

Comment: Revise the CTS markup and provide the appropriate discussions and justification for this More Restrictive change.

Entergy Response:

3.6.6-6 DOC L.3
 CTS 3.3.B.2.a and 3.3.B.2.b
 ITS 3.6.6 ACTIONS and associated Bases

CTS 3.3.B.2.a specifies the Actions to take for an inoperable FCU provided both containment spray trains are OPERABLE. CTS 3.3.B.2.b specifies the actions to take for an inoperable containment spray pump provided the five FCUs and the remaining containment spray pump are OPERABLE. In converting the CTS Actions to ITS 3.6.6 Actions the requirements for containment spray pump and/or FCU OPERABILITY are being deleted. This deletion is justified by DOC L.3. DOC L.3 is incomplete. The justification describes and justifies the deletion associated with CTS 3.3.B.2.a, but not for CTS 3.3.B.2.b. **Comment:** Revise DOC L.3 to include a discussion and justification for the deletion associated with CTS 3.3.B.2.b.

Entergy Response:

3.6.6-7 DOC LA.1
 CTS 4.5.D.1
 ITS SR 3.6.6.2 and associated Bases

CTS 4.5.D.2 specifies that the monthly operation of the FCU be initiated from the control room with flow through the unit. The CTS markup indicates that the requirements for FCU initiation from the control room and flow through the unit is being relocated. This change is justified by DOC LA.1. DOC LA.1 states that this information is being relocated to ITS 3.6.6 Bases. The staff cannot find this information in the Bases for ITS 3.6.6. **Comment:** Revise ITS 3.6.6 Bases to include this information.

Entergy Response:

3.6.6-8 JFD PA.1
 ITS 3.6.6 and associated Bases

The Justification for Differences Section for ITS 3.6.6 provides a JFD PA.1 and an associated discussion. The ITS markup does not show a JFD PA.1 and the discussion refers to consistency with the intent of ITS 3.8.9, which has nothing to do with this LCO. **Comment:** Correct this discrepancy.

Entergy Response:

3.6.6-9 CTS 4.5.D.2
ITS SR 3.6.6.9 and associated Bases

CTS 4.5.D.2 and ITS SR 3.6.6.9 verify the air flow rate for the FCUs. In CTS 4.5.D.2 the frequency for this SR is “once every refueling interval (#).” The CTS markup shows this as changing to 24 months. No justification is provided for this Administrative change as was done for similar changes in other ITS 3.6. sections. **Comment:** Revise the CTS markup and provide a discussion and justification for this Administrative change.

Entergy Response:

3.6.6-10 ITS 3.6.6 ACTIONS C and D, SR 3.6.6.2, SR 3.6.6.3, SR 3.6.6.7, and associated Bases
STS 3.6.6.A ACTIONS C and D, SR 3.6.6A.2, SR 3.6.6A.3, SR 3.6.6.A.7, and associated Bases

STS 3.6.6A ACTIONS C and D, SR 3.6.6A.2, SR 3.6.6.A.3, SR 3.6.6.A.7, and their associated Bases specify the actions to be taken when the required containment cooling train is inoperable and the surveillances to be performed on the required containment cooling trains. ITS 3.6.6 ACTIONS C and D, SR 3.6.6.2, SR 3.6.6.3, SR 3.6.6.7, and their associated Bases deletes the word “required” except in the Bases discussion for ITS 3.6.6 Action C. **Comment:** Correct this discrepancy.

Entergy Response:

3.6.7 Recirculation Fluid pH Control System

3.6.7-1 DOC L.2
CTS 3.3.B.2
ITS 3.6.7 Required Action B.2 and associated Bases

CTS 3.3.B.2 requires that after Hot Shutdown (MODE 3) is reached, the action is to restore the inoperable subsystem to OPERABLE status within the next 48 hours or be in Cold Shutdown within the next 30 hours. This requirement is changed in the CTS markup to MODE 5 in 84 hours. This modification is justified by DOC L.2. The corresponding ITS Action is ITS 3.6.7 Required Action B.2, which requires the plant to be in MODE 5 within 84 hours. Even though the overall time to complete the CTS and ITS Actions of 84 hours does not change (CTS 6 to MODE 3 + 48 + 30 = 84 hours), there is a change in converting the CTS to the ITS. This change relates to when the commencement of shutting down to MODE 5 begins or is declared. In the CTS, it officially starts immediately after the 48-hour allowed outage time to restore the subsystem to OPERABLE status is completed. In the ITS, it starts immediately after MODE 3 is reached. This change is not indicated or justified in the CTS markup for CTS 3.3.B.2. The change is a More Restrictive change (Time for commencement of

shutdown to MODE 5 declared earlier in ITS versus CTS). **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for this More Restrictive change.

Entergy Response:

3.6.7-2 JFD CLB
JFD DB.1
ITS SR 3.6.7.1 and associated Bases
STS SR 3.6.7.1 and associated Bases

STS SR 3.6.7.1 and its associated Bases are modified by Inserts 3.6.7-1-01 and B3.6.7-4-01, respectively. These Inserts in the ITS markup are designated as JFD CLB changes. The Justification for Differences Section for ITS 3.6.7 does not contain a JFD CLB discussion and justification. **Comment:** Provide a discussion and justification for this JFD CLB change.

Entergy Response:

3.6.7-3 JFD DB.1
ITS B3.6.6 Bases - Background
ITS B3.6.7 Bases - A.1
STS B3.6.7 Bases - A.1

STS B3.6.7 Bases - A.1 contains the following sentence: "The Containment Spray System would still be available... in the event of a DBA [design-basis accident]." ITS B3.6.7 Bases - A.1 modifies this sentence by deleting "Containment Spray System" and replacing it with "Recirculation pH control system." Since ITS 3.6.7 Condition A is the action for an inoperable Recirculation pH Control System, the sentence does not make sense because the system is inoperable. The sentence in the STS justifies the 72-hour Completion Time based on an alternate means of iodine removal-the Containment Spray System. This changes does not provide an adequate justification for the 72-hour Completion Time. ITS B3.6.6 Bases- Background states that the Containment Spray System is used to reduce fission products including iodine from the containment atmosphere during a DBA. Based on this, the staff believes that the STS words are correct for justifying the 72-hour Completion Time at IP2. **Comment:** Revise the ITS markup to reflect the STS words.

Entergy Response:

3.6.7-4 JFD PA.1
ITS 3.6.7 and associated Bases

The Justification for Differences Section for ITS 3.6.7 provides a JFD PA.1 and an associated discussion. The ITS markup does not show a JFD PA.1 and the discussion refers to consistency with the intent of ITS LCO 3.8.9, which has nothing to do with this LCO. **Comment:** Correct this discrepancy.

Entergy Response:

3.6.8 Hydrogen Recombiners

- 3.6.8-1 DOC A.3
- CTS 3.0.1
- CTS 3.3.G.2
- ITS LCO 3.0.4
- ITS 3.6.8 RA A.1 Note and associated Bases

CTS 3.3.G.2 is modified by the addition of ITS 3.6.8 RA A.1 Note. This change is justified by DOC A.3. DOC A.3 states that the CTS does not have a requirement equivalent to ITS LCO 3.0.4 which would prevent entry into a higher MODE when a system is inoperable, and thus it does not change existing requirements. This is incorrect. The staff believes that CTS 3.0.1 and 3.3.G.2 would not allow MODE changes with inoperable hydrogen recombiners, other than shutting down. Furthermore, it would not be the prudent and safe action to take with inoperable equipment. The staff believes the change is a Less Restrictive (L) change since it allows MODE changes. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

Entergy Response:

-
- 3.6.8-2 DOC A.4
 - JFD DB.1
 - CTS Table 1-1
 - CTS 4.5.C.2
 - ITS SR 3.6.8.2 and associated Bases

CTS 4.5.C.2 states that “A sample plate from each PAR shall be removed at each refueling outage and tested....” The CTS markup modifies CTS 4.5.C.2 by changing “each refueling outage” to “24 months.” This change is justified by DOC A.4. This is incorrect. The term “each refueling outage” does not have a qualifier associated with it (i.e., # or ##). Thus, by CTS Table 1-1 “each refueling outage” would be associated with a frequency of 18 months rather than 24 months which is associated with the qualifiers - # and ##. Thus, the change is a Less Restrictive (L) change rather than an Administrative change. In addition, this change is considered a beyond scope of review item for this conversion. **Comment:** Delete this change.

Entergy Response:

-
- 3.6.8.3 JFD DB.1
 - JFD PA.1
 - ITS B3.6.8 Bases - Applicable Safety Analyses and Applicability
 - STS B3.6.8 Bases - Applicable Safety Analyses and Applicability

STS B3.6.8 Bases - Applicable Safety Analyses and Applicability are modified by changing hydrogen concentration of 4.1 v/o to 4.0 v/o. This change is justified by JFDs DB.1 and PA.1. JFD DB.1 justifies changes to the STS surveillance based on current licensing bases and has nothing to do with hydrogen concentration. JFD PA.1 discussed editorial changes with regards to consistency with the intent of ITS LCO 3.8.9 which has nothing to do with hydrogen recombiners or hydrogen concentration.

Comment: Provide a discussion and justification for this change.

Entergy Response:

3.6.9 Isolation Valve Seal Water (IVSW) System

3.6.9-1 DOC A.3
 DOC A.4
 DOC A.4 (ITS 3.6.10)
 DOC A.5 (ITS 3.6.10)
 DOC M.1
 DOC M.4
 DOC M.5 (ITS 3.6.10)
 DOC M.6 (ITS 3.6.10)
 CTS 3.3.C.3 and 3.3.D.3
 ITS 3.6.9 ACTION C, 3.6.10 ACTION C and associated Bases

CTS 3.3.C.3 specifies the actions to be taken if the IVSW system is not restored to OPERABLE status within the time period specified in CTS 3.3.C.2. CTS 3.3.D.3 specifies the Actions to be taken if the Weld Channel and Penetration Pressurization System (WC & PPS) is not returned to OPERABLE status within the time period specified in CTS 3.3.D.2. Both CTS 3.3.C.3 and 3.3.D.3 use the exact same words and in converting from the CTS to the ITS end up with the same ITS shutdown Action - ITS 3.6.9 ACTION C for CTS 3.3.C.3 and ITS 3.6.10 ACTION C for CTS 3.3.D.3. However, the CTS markup for both CTS 3.3.C.3 and 3.3.D.3 is different when they should be the same. The CTS markup shows that CTS 3.3.C.3.a is changed by DOCs A.3, A.4, and M.4 and CTS 3.3.C.3.b and c are changed by DOCs A.3 and M.1; while CTS 3.3.D.3.a is changed by DOCs A.5 and M.6 and CTS 3.3.D.3.b and c are changed by DOCs M.5 and M.6. A review of the DOCs shows that DOCs A.4 and A.5 (ITS 3.6.10) should be the same justification, DOCs M.4 and M.6 (ITS 3.6.10) should be the same, and DOCs M.1 and M.5 (ITS 3.6.10) should be the same. Yet the discussions and justifications are not identical and lack some of the discussions and justifications that are found in the corresponding DOCs. In addition, the markup of CTS 3.3.C.3.b and c needs to show a DOC M.4 similar to the DOC M.6 (ITS 3.6.10) in the CTS markup of CTS 3.3.D.3.b and c, and the markup of CTS 3.3.D.3.a, b, and c needs to show a DOC A.4 (ITS 3.6.10) similar to DOC A.3 in the CTS markup of CTS 3.3.C.3.a, b, and c. **Comment:** Revise the CTS markups of CTS 3.3.C.3 and CTS 3.3.D.3 to be consistent and revise or provide the appropriate discussions and justification associated with the Administrative and More Restrictive changes made to these specifications.

Entergy Response:

3.6.9-2 DOC M.3
 ITS SR 3.6.9.2 and associated Bases

DOC M.3 adds ITS SRs 3.6.9.2, 3.6.9.4, and 3.6.9.5. ITS SR 3.6.9.2 has a frequency of 24 hours while ITS SRs 3.6.9.4 and 3.6.9.5 have a frequency of 24 months. The discussion in the DOC summary for DOC M.3 states that the frequency for all SRs is 24 months. **Comment:** Correct this discrepancy.

Entergy Response:

3.6.9-3 JFD X.1
 ITS 3.6.9 and associated Bases

The Justification for Differences in ITS 3.6.9 shows a JFD X.1. The ITS markup of ITS 3.6.9 and its associated Bases does not show a JFD X.1. **Comment:** Correct this discrepancy.

Entergy Response:

3.6.9-4 CTS 3.3.C.2.b
 ITS 3.6.9 Condition A and associated Bases

CTS 3.3.c.2.b specifies that any valve required for the functioning of the IVSW system may be inoperable provided that all valves in the system that provide a duplicate function are OPERABLE. The corresponding ITS condition is the second part of ITS 3.6.9 Condition A, which allows one IVSW automatic actuation valve to be inoperable in one or both headers. The ITS Condition is not in conformance with the CTS which only allows one valve header to be inoperable, the wording is confusing (one valve inoperable but both headers may be inoperable) and is different from the approved version for the similar system in Indian Point 3 ITS 3.6.9. **Comment:** Delete the change that adds "one or both headers" to ITS 3.6.9 Condition A.

Entergy Response:

3.6.9-5 CTS 3.3.C.2.b
 ITS B3.6.9 Bases - A.1

CTS 3.3.C.2.b states that any IVSW system valve may be inoperable for up to 7 days provided that "all valves in the system that provide a duplicate function are operable." The CTS markup shows this requirement as being part of Condition A and Required Action A.1 when in fact this requirement "all valves...are operable" has been relocated to ITS B3.6.9 Bases. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (LA) change.

Entergy Response:

3.6.10 Weld Channel and Penetration Pressurization System (WC&PPS)

3.6.10-1 DOC A.3 (ITS 3.6.9)
 DOC A.4 (ITS 3.6.9)
 DOC A.4
 DOC A.5
 DOC M.1 (ITS 3.6.9)
 DOC M.4 (ITS 3.6.9)
 DOC M.5
 DOC M.6
 CTS 3.3.C.3 and 3.3.D.3
 ITS 3.6.9 ACTION C, 3.6.10 ACTION C and associated Bases

See Comment Number 3.6.9-1. **Comment:** See Comment Number 3.6.9-1

Entergy Response:

3.6.10-2 JFD X.1
 CTS 4.4.B and associated Bases
 ITS SR 3.6.10.3 and associated Bases

Based on the CTS Bases discussion the sensitive leakage rate test CTS 4.4.B is part of the 10 CFR Appendix J Option B Type C leakage tests. Thus, the test frequency is restricted; i.e., ITS SR 3.0.2 is not applicable to this test. ITS SR 3.6.10.3 is the corresponding ITS SR. The frequency specified for this SR is not restricted; i.e., ITS SR 3.0.2 is applicable. This is unacceptable. A Note should be added to the frequency of ITS SR 3.6.10.3 stating that "SR 3.0.2 is not applicable" similar to what was done for Indian Point 3 ITS SR 3.6.10.3. **Comment:** Revise the CTS/ITS markups to reflect this SR Note addition and provide the appropriate discussion and justification for this change.

Entergy Response:

3.6.10-3 CTS 4.4.A.1e and 4.4.A.2
 ITS 5.5.14 and 5.5.15

See Comment Number 3.6.1-1. **Comment:** See Comment Number 3.6.1-1.

Entergy Response:

5.5.14 Containment Leakage Rate Testing Program

5.5.14-1 JFD CLB
ITS 5.5.14

The ITS markup of ITS 5.5.14 shows a number of changes marked with a JFD CLB. The Justification for Differences for ITS 5.5.14 does not include a JFD CLB. **Comment:** Provide a discussion and justification for this change.

Entergy Response:

5.5.14-2 CTS 4.4.A.2
ITS 5.5.14.c
ITS B3.6.1 Bases - Applicable Safety Analyses

CTS 4.4.A.2 and ITS B3.6.1 Bases - Applicable Safety Analyses defines L_a as equal to 0.1 w/o per day of containment steam air atmosphere at 47 psig and 217° F. ITS 5.5.14.c defines L_a as 0.1% of containment air weight per day at P_a (47 psig) and 271°F. The word “steam” is dropped from the ITS 5.5.14.c definition but retained in the ITS B3.6.1 Bases - Applicable Safety Analyses definition of L_a . **Comment:** Correct this discrepancy and provide any necessary discussion and justification for the change in definition.

Entergy Response:

4.4.D.2.b Service Water Isolation Valve Leakage System

4.4.D.2.b-1 DOC R.16
CTS 4.4.D.2.b
Indian Point 3 ITS 3.6.3 ACTION D, SR 3.6.3.10 and associated Bases
NUREG-1433/1434 STS 3.6.1.3 ACTION D, SR 3.6.1.3.14 (NUREG-1433),
SR 3.6.1.3.11(NUREG-1434) and associated Bases

CTS 4.4.D.2.b specifies the surveillance and acceptance criteria for the service water isolation valve leakage system. The CTS markup indicates by DOC R.16 that these requirements are to be relocated to the UFSAR and TRM. The staff has reviewed the justification provided in DOC R.16, as well as the Safety Evaluation (SE) issued with Amendment No. 190 dated April 10, 1997. The staff concludes, based on the Amendment No. 190 SE that CTS 4.4.D.2.b cannot be relocated out of the ITS since it is considered part of the Containment Leakage Rate Test Program. The staff finds that CTS 4.4.D.2.b must be retained in ITS 3.6.3 and 5.5.14, however, specific details (i.e., pressures and leakage rates) may be relocated to the appropriate ITS Bases or the Containment Leakage Rate Testing Program, depending on how similar SRs are addressed in the STS NUREGs. See IP3 ITS 3.6.3 ACTION D and SR 3.6.3.10 or NUREGs 1433 or 1434 - BWR 4/6 STS for how to incorporate this requirement into the IP2 ITS. See Comment Number 3.6.3-22. In addition, DOC R.16 deals with the relocation of the requirements of the City Water System not the Service Water System and does not specifically address CTS 4.4.D.2.b. **Comment:** Revise the CTS and ITS markups and provide the appropriate discussions and justifications for the retention of the specification. See Comment Number 3.6.3-22.

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