July 25, 2002

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING RELIEF

REQUEST TO USE RISK-INFORMED INSERVICE INSPECTION, INDIAN

POINT NUCLEAR GENERATING UNIT NO. 3 (TAC NO. MB4637)

Dear Mr. Kansler:

In a letter dated February 5, 2002, Entergy Nuclear Operations, Inc. (ENO) submitted proposed Relief Request No. RR 3-38 to use the Risk-Informed Inservice Inspection (RI-ISI) Program as an alternative to the requirements in Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for Indian Point Nuclear Generating Unit No. 3. The proposed alternative would be applied to Class 1, Category B-F and B-J welds.

The U.S. Nuclear Regulatory Commission staff is reviewing the information provided in the February 5 submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). During a telephone call on July 11, 2002, the ENO staff indicated that a response to the RAI would be provided within 60 days.

If you should have any questions, please do not hesitate to call me.

Sincerely,

/RA/

Patrick D. Milano, Sr. Project manager, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosure: RAI

cc w/encl: See next page

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Indian Point Nuclear Generating Unit No. 3

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Indian Point Nuclear Generating Unit No. 3

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Request for Additional Information

Regarding Relief Request RR 3-28 to Use Risk-informed Inservice Inspection

Indian Point Nuclear Generating Unit No. 3

In a letter dated February 5, 2002, Entergy Nuclear Operations, Inc. (the licensee) submitted a proposed Relief Request No. RR 3-38 to use the Risk-Informed Inservice Inspection (RI-ISI) Program as an alternative to the requirements in Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the American Society of Mechanical Engineers(ASME) Boiler and Pressure Vessel Code for Indian Point Nuclear Generating Unit No. 3. The NRC staff has the following questions regarding the information provided in the proposed alternative:

- Section 3.4, "Risk Characterization," of RI-ISI Program Plan states, in part, that each piping segment was evaluated to determine its potential for failure and impact on containment performance (isolation, bypass and large early release). The Program Plan does not include a large early release frequency (LERF) estimate for your probablisitc risk assessment nor any other LERF information. Describe how the impact of segment failure on containment performance (isolation, bypass and large early release) was evaluated.
- 2. Provide a discussion of the expected change in LERF due to implementing the RI-ISI program.
- 3. In Section 4, "Implementation and Monitoring," the licensee addresses the procedures to implement and monitor the RI-ISI program. Does the licensee plan, as a minimum, to review and adjust the risk ranking of piping segments on an ASME ISI interval basis? Will information coming from NRC bulletins or generic letters and from industry and plant-specific feedback be evaluated for significance and factored, as necessary, into more frequent adjustments of the ranking?
- 4. Section 3.5.1, "Additional Examinations," states that "[a]dditional examinations will be performed on these elements up to a number equivalent to the number of elements required to be inspected on the segment or segments initially." Clarify this statement regarding the sample size selection for augmented inspections.

If additional examinations are needed following the identification of an unacceptable flaw, will all high and medium risk welds in the population of welds (with the same degradation mechanisms) be included in the examination population from which the additional sample will be selected? Discuss the time frame for performing these expanded examinations.