

December 31, 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 - REQUEST FOR
ADDITIONAL INFORMATION (RAI) REGARDING SECTION 3.8.1 - AC
SOURCES OPERATING - BEYOND SCOPE ISSUE NO. 7 (TAC NO. MB5068)

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 3.8.1, "AC Sources - Operating," 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

REVIEW OF IMPROVED TECHNICAL SPECIFICATION (ITS) BEYOND SCOPE ITEM NO. 7

ITS SECTION 3.8.1 - AC SOURCES - OPERATING

INDIAN POINT UNIT 2

1. Note that Surveillance Requirement (SR) 3.8.1.12 allows all three emergency diesel generators (EDGs) to be tested concurrently, however during shutdown at least one EDG is required to be operable. Please justify testing all three EDGs simultaneously.
2. Provide justification for performing SR 3.8.1.10 for 8 hours rather than 24 hours as required by NUREG-1432, Rev. 2.
3. Limiting Condition for Operation (LCO) 3.8.1A3 of NUREG-1432 establishes a limit on the maximum time of 6 days allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. Please provide justification for not providing this 6-day limit as required by NUREG-1432 in the proposed SRs 3.8.1.A and B.
4. The proposed SRs 3.8.1.7 and 8 verify manual transfer of AC power sources from the normal offsite circuit to the alternate offsite circuit and automatic transfer of AC power for 6.9 kV buses 2 and 3 from the unit auxiliary transformer to 6.9 kV buses 5 and 6 respectively. NUREG-1432 requires that these surveillances not be performed during Modes 1 and 2. Please provide justification for not having any Mode restrictions for these SRs.
5. Required Action 3.8.1.A2 replaces the requirement of current technical specification 3.7.B.4 that "6.9 kV bus tie breaker control switches -- in the CCR [central control room] shall be placed in the 'pull-out' position and tagged" with the requirement to disable the automatic transfer within 1 hour and re-verify every 8 hours thereafter. It is not clear to the staff as to how the operator will know that the switches are in the "pull-out position" if these switches are not tagged. Please justify for removing the current requirement of tagging the switches.
6. The proposed LCO 3.8.1.A3 requires the declaration of the required feature(s) with no offsite power automatically available inoperable when its redundant required feature(s) is inoperable. Provide justification for not declaring required feature(s) inoperable when its redundant required feature(s) is inoperable when manually connected offsite power source is available.
7. It is stated that on a trip of the main generator, one or two reactor coolant pumps are supplied by the 13.8 kV offsite source and that the 13.8 kV source retains sufficient capacity to support engineered safety feature loads required in Modes 3 and 4. It is not clear to the staff if this source has enough capacity to supply these loads in Modes 1 and 2. Please clarify.

Enclosure

8. Please explain as to why the proposed change to verify that auto transfer is disabled within 1 hour rather than the current requirement to disable the automatic transfer performed prior to switching to the 13.8 kV offsite source is a more restrictive change. In addition, please explain if the 13.8/6.9 kV source is capable of powering the safety loads for 1 hour in the event of a unplanned transfer.
9. NUREG-1432, SR 3.8.1.18 requires verification that the interval between each sequenced load block is within $\pm 10\%$ of design interval for each emergency load sequencer. The proposed change verifies that load sequence timer relay functions are within the required design interval. It is not clear to the staff why there is not any compensation provided for the load sequencer timer relay drift.