



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc
Indian Point Energy Center
295 Broadway, Suite 1
P O Box 249
Buchanan, NY 10511-0249

January 9, 2003
NL-03-004

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

SUBJECT: Indian Point Nuclear Generating Units 2 & 3
Docket Nos. 50-247 & 50-286
**10 CFR 50.55a Inservice Testing Program Relief Request Regarding
Relief Valve Testing; Elapsed Time Between Successive Openings**

- References:
1. ASME/ANSI OM Code, Operation and Maintenance of Nuclear Power Plants, Part 1, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices", 1987 Edition.
 2. ASME/ANSI OM Code, Operation and Maintenance of Nuclear Power Plants, Part 1, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices", 1995 Edition, 1997 Addenda.
 3. Federal Register Notice 67FR60520, published September 26, 2002; "Industry Codes and Standards; Amended Requirements."
 4. NEI White Paper, "Standard Format for Requests from Commercial Reactor Licensees Pursuant to 10 CFR 50.55a", dated September 30, 2002.

Dear Sir:

Entergy Nuclear Operations, Inc. (ENO) is requesting NRC approval for use of a later ASME Code Edition / Addenda in accordance with 10 CFR 50.55a(f)(4)(iv). This request pertains to Inservice Testing (IST) Program relief valve testing requirements at Indian Point Units 2 and 3 (IP2 and IP3).

The IST Programs currently require a minimum elapsed time of 10 minutes between successive lifts, based on ASME OM Code, 1987 Edition (Reference 1). ENO is requesting approval to use ASME OM Code, 1995 Edition, 1997 Addenda (Reference 2), which allows a minimum elapsed time of 5 minutes. The later ASME Code editions / addenda recently have been incorporated into 10 CFR 50.55a (Reference 3).

The 10 CFR 50.55a requests for IP2 and IP3 are provided in Attachments I and II, respectively. These requests follow the format of the recently issued NEI White Paper (Reference 4). ENO is

A047

requesting approval by March 15, 2003 to support implementation during the upcoming IP3 refueling outage. There are no new commitments made by this letter. If you have any questions, please contact Kevin Kingsley at 914-734-5581.

Very truly yours,



Fred Dacimo
Site Vice President
Indian Point Energy Center

Attachments: I. Indian Point Unit 2, IST Program Relief Request 45 (Valve)
II. Indian Point Unit 3, IST Program Relief Request VR-5

cc: Mr. Hubert J. Miller
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. Patrick Milano, Senior Project Manager
Project Directorate I-1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 0-8-C2
Washington, DC 20555-0001

U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 2 Nuclear Power Plant
P.O. Box 38
Buchanan, NY 10511

U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant
P.O. Box 337
Buchanan, NY 10511

ATTACHMENT I TO NL-03-004
INDIAN POINT 2 IST PROGRAM RELIEF REQUEST 45 (Valve)
SAFETY AND RELIEF VALVE TESTING

1. ASME Code Components Affected

System: Various
Component: Safety and relief valves
Valve Category: A/C, C
Functions: Safety and relief valves lift at a set pressure to relieve system pressure thereby providing overpressure protection for components and piping systems.

2. Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 1987 Edition (ASME/ANSI-1987), Part 1, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices (OM-1), paragraphs 8.1.1.8, 8.1.2.8, and 8.1.3.7 for safety and relief valves providing steam service, compressible fluid services other than steam, and liquid service, provide test method requirements for the time between valve openings, and states "*A minimum of 10 min. shall elapse between successive openings.*"

3. Proposed Subsequent Code Edition and Addenda (or Portion)

Entergy proposes to use the ASME OM Code, 1997 Addenda to the 1995 ASME OM Code for Operation and Maintenance of Nuclear Power Plants (the Code), Appendix I, paragraphs 8.1.1(h), 8.1.2(h), and 8.1.3(g) for safety and relief valves providing steam service, compressible fluid services other than steam, and liquid service, which provide test method requirements for the time between valve openings, and states "*A minimum of 5 min shall elapse between successive openings.*" On September 26, 2002, the NRC published a final rule on 10 CFR Part 50 (67 FR 60520) which incorporates, by reference, the 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda of the ASME OM Code, with an effective date of October 28, 2002. This request for relief is submitted pursuant to 10 CFR 50.55a(f)(4)(iv).

4. Related Requirements

10 CFR 50.55a, "Codes and Standards" was revised effective October 2002 (Federal Register 67FR60520) to incorporate, by reference, the 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda of the ASME OM Code with one modification. This modification is not related to the proposed use of the 1997 Addenda. There are no limitations or modifications, which are associated with this section of the OM-1, addressed in 10 CFR 50.55a(b). There are no related requirements which are required to be met.

5. Duration of Proposed Request

Relief is requested for the remainder of the third IST interval for IP2 (July 1, 1994 through April 3, 2006; based on ConEd letter to NRC, dated February 1, 2001.)

ATTACHMENT II TO NL-03-004
INDIAN POINT 3 IST PROGRAM RELIEF REQUEST VR-5
SAFETY AND RELIEF VALVE TESTING

1. ASME Code Components Affected

System:	Various
Component:	Safety and relief valves
Valve Category:	A/C, C
Functions:	Safety and relief valves lift at a set pressure to relieve system pressure thereby providing overpressure protection for components and piping systems.

2. Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 1987 Edition (ASME/ANSI-1987), Part 1, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices (OM-1), paragraphs 8.1.1.8, 8.1.2.8, and 8.1.3.7 for safety and relief valves providing steam service, compressible fluid services other than steam, and liquid service, provide test method requirements for the time between valve openings, and states "*A minimum of 10 min. shall elapse between successive openings.*"

3. Proposed Subsequent Code Edition and Addenda (or Portion)

Entergy proposes to use the ASME Omb Code, 1997 Addenda to the 1995 ASME OM Code for Operation and Maintenance of Nuclear Power Plants (the Code), Appendix I, paragraphs 8.1.1(h), 8.1.2(h), and 8.1.3(g) for safety and relief valves providing steam service, compressible fluid services other than steam, and liquid service, which provide test method requirements for the time between valve openings, and states "*A minimum of 5 min shall elapse between successive openings.*" On September 26, 2002, the NRC published a final rule on 10 CFR Part 50 (67 FR 60520) which incorporates, by reference, the 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda of the ASME OM Code, with an effective date of October 28, 2002. This request for relief is submitted pursuant to 10 CFR 50.55a(f)(4)(iv).

4. Related Requirements

10 CFR 50.55a, "Codes and Standards" was revised effective October 2002 (Federal Register 67FR60520) to incorporate, by reference, the 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda of the ASME OM Code with one modification. This modification is not related to the proposed use of the 1997 Addenda. There are no limitations or modifications, which are associated with this section of the OM-1, addressed in 10 CFR 50.55a(b). There are no related requirements which are required to be met.

6. Duration of Proposed Request

Relief is requested for the remainder of the third IST interval for IP3 (July 21, 2000 through July 20, 2009).