Entergy

Entergy Nuclear Northeast
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249
Tel 914 734 6700

Fred Dacimo
Site Vice President
Administration

September 9, 2004
NL-04-115

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Indian Point Nuclear Generating Units No. 2 and No. 3
Docket No. 50-247, and 50-286
Reply to RAI regarding Relief Request Nos. RR-65 and 3-34 Concerning Examination Qualification Requirements (TAC Nos. MC1263 & MC1264)

References:

1. USNRC letter from Patrick D. Milano to Michael Kansler; "Request for Additional Information Regarding Relief Request Nos. RR-65 and 3-34 Concerning Examination Qualification Requirements, Indian Point Nuclear Generating Unit Nos. 2 and 3 (TAC Nos. MC1263 and MC1264)", dated July 21, 2004.

2. Entergy Letter NL-03-173, "Third Ten-Year Inservice Inspection Program Pressure Retaining Piping Welds Relief Requests, RR-65 and RR-66 (for IP2), and RR 3-34 and RR 3-35 (for IP3)", dated October 30, 2003.

Dear Sir or Madam:

This letter provides a reply to the Request for Additional Information (RAI) from the Nuclear Regulatory Commission (Reference 1) regarding the relief request nos. RR-65 and 3-34 submitted by Entergy Nuclear Operations, Inc (Entergy) in Reference 2. Entergy's responses to the RAI questions are provided in Attachment I.

Approval of RR-65 for IP2 is requested by September 30, 2004 to support the IP2 Fall 2004 refueling outage. Due to the similarity of these requests for relief, it is also requested that approval of RR 3-34 for IP3 be granted at the same time.

A047

There are no new commitments made in this letter. If you have any questions, please contact Mr. Pat Conroy at 914-734-6668.

Very truly yours,

Fred Dacimo
Site Vice President
Indian Point Energy Center

Attachment I: Response to RAI Regarding Relief Request Nos. RR-65 and 3-34.

cc: next page

cc:

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

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

Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511-0337

Senior Resident Inspector's Office
Indian Point Unit 2
U.S. Nuclear Regulatory Commission
P.O. Box 59
Buchanan, NY 10511-0059

Mr. Paul Eddy
New York State Department
of Public Service
3 Empire State Plaza
Albany, NY 12223

Mr. Peter R. Smith, President
New York State Energy, Research,
and Development Authority
17 Columbia Circle
Albany, NY 12203

ATTACHMENT I TO NL-04-115

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING

RELIEF REQUEST NOS. RR-65 AND 3-34

CONCERNING EXAMINATION QUALIFICATION REQUIREMENTS

ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 AND 3
DOCKETS 50-247 AND 50-286

Response to RAI Regarding Relief Request Nos. RR-65 and 3-34

By letter dated October 30, 2003, Entergy Nuclear Operations, Inc. (the licensee) proposed alternatives to certain requirements in Supplement 10 to Appendix VIII of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) at Indian Point Nuclear Generating Unit Nos. 2 and 3 (IP2 and 3). Specifically, the licensee requested in the Addenda to relief requests (RR) 65 and 3-34 (Enclosures 1 and 3 to the October 30 letter) alternatives to certain requirements for the procedure qualification requirements for inspection of ASME Class 1 pressure retaining piping welds. The staff needs the following information to continue its review:

Question 1:

"The licensee is requesting relief for Examination Category B-F, "Pressure Retaining Piping Welds," Items B5.10, B5.40, and B5.70.

Provide a list of the unique identification numbers for the dissimilar metal welds (DMW) within scope of the RRs."

Response to Question 1:

The unique identification numbers for the dissimilar metal welds (DMW) within scope of the respective RRs are as follows:

A). For IP2 (dissimilar metal welds under RR-65):

Category	Item	Drawing Nos.	Weld Numbers
B-F	B5.10	206913	RPVS21- 1A
B-F	B5.10	206913	RPVS21- 14A
B-F	B5.10	206913	RPVS22- 1A
B-F	B5.10	206913	RPVS22- 14A
B-F	B5.10	206913	RPVS23- 1A
B-F	B5.10	206913	RPVS23- 14A
B-F	B5.10	206913	RPVS24- 1A
B-F	B5.10	206913	RPVS24- 14A
B-F	B5.40	206918	PZRS1
B-F	B5.40	206918	PZRS2
B-F	B5.40	206918	PZRS3
B-F	B5.40	206918	PZRS4
B-F	B5.40	206918	PZRS5
B-F	B5.40	206918	PZRS6
B-F	B5.70	206914	SGS 21R-4
B-F	B5.70	206914	SGS 21R-5
B-F	B5.70	206915	SGS 22R-4
B-F	B5.70	206915	SGS 22R-5
B-F	B5.70	206916	SGS 23R-4
B-F	B5.70	206916	SGS 23R-5
B-F	B5.70	206917	SGS 24R-4
B-F	B5.70	206917	SGS 24R-5

B). For IP3 (dissimilar metal welds under RR 3-34):

Category	Item	INT Sketch	Weld Numbers
B-F	B5.10	1-4100	1(DM), 16 (DM)
B-F	B5.10	1-4200	1(DM), 16(DM)
B-F	B5.10	1-4300	1(DM), 16(DM)
B-F	B5.10	1-4400	1(DM), 16(DM)
B-F	B5.40	1-4500	1(DM)
B-F	B5.40	1-4501	1(DM)
B-F	B5.40	1-4502	1(DM)
B-F	B5.40	1-4503	1(DM)
B-F	B5.40	1-4504	16(DM)
B-F	B5.40	1-4505	1(DM)
B-F	B5.70	1-4100	5(DM), 6(DM)
B-F	B5.70	1-4200	5(DM), 6(DM)
B-F	B5.70	1-4300	5(DM), 6(DM)
B-F	B5.70	1-4400	5(DM), 6(DM)

Question 2:

"The licensee stated that the its vendor contracted to perform the DMW examinations was not successful in achieving the ASME Code, Appendix VIII, Supplement 10, Paragraph 3.2 requirement for a depth sizing of weld defects with a 0.125-inch root mean square error value.

Provide the error value that was actually achieved, and provide an explanation on the acceptability of this value."

Response to Question 2:

For Appendix VIII, Supplement 10 examinations, Entergy's vendor (WesDyne) achieved an actual depth sizing root mean square (RMS) error value of 0.189" instead of the ASME Code, Appendix VIII, Supplement 10, Paragraph 3.2 requirement for a depth sizing of weld defects with a 0.125-inch root mean square error value.

For flaw assessment purposes, Entergy will add the difference between the Code required value of 0.125" and the achieved value of 0.189" (i.e., 0.064") to the measured depth of the indications recorded. This will add a conservative value of approximately 0.064" to the measured flaw depth prior to assessment of the indication according to the requirements of Section XI.

Question 3:

"The licensee stated that the examination procedure is fully qualified only for the detection and length sizing of circumferential flaws at IP2 and 3.

Provide a discussion on the examination and disposition of axial flaws."

Response to Question 3:

To clarify the statement made by Entergy in the original submittal, the examination procedure is indeed fully qualified only for the detection and length sizing of circumferential flaws. For axial flaws, the vendor's procedure on Supplement 10 detection has limitations that apply only to axial flaws in pipe ID conditions of "exposed root or counter bore" (Ref. PDI PDQS No. 471, dated 10-11-03.) However, these ID conditions are not present at Indian Point Units 2 and 3, where the ID surface has been ground smooth and flat after the application of a layer of overlay. Good transducer contact is expected on this particular ID surface at both IP2 and IP3, and no limitation of detection of axial flaws is expected in the application of the examination procedure.