



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

Fred Dacimo
Site Vice President
Administration

February 28, 2005

Re: Indian Point Units No. 2 and 3
Docket Nos. 50-247 and 50-286
NL-05-023

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Stop O-P1-17
Washington, DC 20555-0001

**SUBJECT: 90-Day Response to NRC Generic Letter 2004-02, Potential Impact Of
Debris Blockage On Emergency Recirculation During Design Basis
Accidents At Pressurized-Water Reactors**

References: 1. NRC Generic Letter 2004-02, "Potential Impact Of Debris Blockage On
Emergency Recirculation During Design Basis Accidents At Pressurized-
Water Reactors", dated September 13, 2004.

Dear Sir:

This letter provides Entergy Nuclear Operations (Entergy), Inc. 90-day response to NRC Generic Letter (GL) 2004-02 (Reference 1) for Indian Point Unit 2 and Indian Point Unit 3. The information requested by the Generic Letter is provided in Attachment 1.

Commitments being made by Entergy are listed in Attachment 2 to this letter. If you have any questions or require additional information, please contact Mr. Patric W. Conroy, Licensing Manager at 914-734-6668.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 02-28-05.

Sincerely,

A handwritten signature in black ink, appearing to be "FD", with a horizontal line extending to the right.

Fred R. Dacimo
Site Vice President
Indian Point Energy Center

cc: next page

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Attachment 1: 90-day response to NRC Generic Letter 2004-02
Attachment 2: Commitments in 90-day Response to NRC Generic Letter 2004-02

cc:

Mr. Patrick D. Milano, Senior Project Manager
Project Directorate I,
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop O 8 C2
Washington, DC 20555

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

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

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

Mr. Paul Eddy
NYS Department of Public Service
3 Empire Plaza
Albany, NY 12223

ATTACHMENT 1 TO NL-05-023

**90-Day Response to NRC Generic Letter 2004-02, Potential Impact Of Debris
Blockage On Emergency Recirculation During Design Basis Accidents At
Pressurized-Water Reactors**

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNITS 2 AND 3
DOCKETS 50-247 AND 50-286**

90-Day Response to NRC Generic Letter 2004-02, Potential Impact Of Debris Blockage On Emergency Recirculation During Design Basis Accidents At Pressurized-Water Reactors

Requested Information Item:

All addressees are requested to provide the following information:

Within 90 days of the date of the safety evaluation report providing the guidance for performing the requested evaluation, addressees are requested to provide information regarding their planned actions and schedule to complete the requested evaluation. The information should include the following:

(a) A description of the methodology that is used or will be used to analyze the susceptibility of the ECCS and CSS recirculation functions for your reactor to the adverse effects identified in this generic letter of post-accident debris blockage and operation with debris-laden fluids identified in this generic letter. Provide the completion date of the analysis that will be performed.

(b) A statement of whether you plan to perform a containment walkdown surveillance in support of the analysis of the susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in this generic letter. Provide justification if no containment walkdown surveillance will be performed. If a containment walkdown surveillance will be performed, state the planned methodology to be used and the planned completion date.

Entergy Response:

The safety evaluation providing guidance for performing the evaluation requested by GL 2004-02 was issued December 6, 2004 (Reference 1) and the following provides the requested information.

(a) Entergy plans to follow the guidance of the Nuclear Energy Institute (NEI) document titled "*Pressurized-Water Reactor Sump Performance Evaluation Methodology*", as approved and supplemented by the Reference 1 NRC Safety Evaluation, to analyze the susceptibility of the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions to the adverse effects of post-accident debris blockage and operation with debris-laden fluids identified in GL 2004-02.

In February 2005 Entergy began the formal analysis using the guidance of Reference 1. No exceptions to the Safety Evaluation have been identified to date. However, as the analysis develops, the current licensing basis or plant specific features may require that exceptions be taken. Entergy will notify the NRC of any such exceptions in a timely manner. The analysis is scheduled to be completed by September 1, 2005.

(b) Containment walkdowns, to support the analysis of susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in GL 2004-02, were completed for Unit 2 in November 2004. These walkdowns were performed in accordance with the guidance provided in the NEI document titled "*Pressurized-Water Reactor (PWR) Sump Performance Methodology*", (Reference 2) and NEI 02-01 (Reference 3).

The corresponding Unit 3 containment walkdowns will be performed using guidance provided in NEI 02-01 (Reference 3). In addition, the walkdowns will include sampling for latent debris (dust and lint) using guidance in NEI 04-07 and the NRC Safety Evaluation (Reference 1). These walkdowns will be completed by April 30, 2005.

References

1. Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Generic Letter 2004-02, Nuclear Energy Institute Guidance Report (NEI 04-07) "*Pressurized Water Reactor Sump Performance Evaluation Methodology*", dated December 6, 2004.
2. Nuclear Energy Institute Proposed Document NEI 04-07, "*Pressurized-Water Reactor (PWR) Sump Performance Methodology*", dated May 28, 2004.
3. Nuclear Energy Institute Report NEI 02-01, "*Condition Assessment Guidelines: Debris Sources Inside PWR Containments*", Revision 1, dated September, 2002

ATTACHMENT 2 TO NL-05-023

**Commitments in 90-Day Response to NRC Generic Letter 2004-02, Potential
Impact Of Debris Blockage On Emergency Recirculation During Design Basis
Accidents At Pressurized-Water Reactors**

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNITS 2 AND 3
DOCKETS 50-247 AND 50-286**

Number	Commitment	Due Date
1	Complete Indian Point Unit 3 containment walkdowns to support the analysis of susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in Generic Letter 2004-02.	April 30, 2005
2	Complete the analyses of the susceptibility of the ECCS and CSS recirculation functions for Indian Point Unit 2 and Unit 3 to the adverse effects of post accident debris blockage and operation with debris-laden fluids identified in Generic Letter 2004-02.	September 1, 2005