

July 12, 2006

Mr. Michael R. Kansler
President
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3 - REQUEST
FOR ADDITIONAL INFORMATION REGARDING AMENDMENT APPLICATION
TO REVISE TECHNICAL SPECIFICATIONS (TAC NOS. MD2178 AND
MD2179)

Dear Mr. Kansler:

On May 31, 2006, Entergy Nuclear Operations, Inc. (Entergy), submitted an application for a proposed amendment for Indian Point Nuclear Generating Unit Nos. 2 and 3 which would revise the Technical Specifications (TSs) on steam generator tube integrity per the TS Task Force (TSTF) change document TSTF-449, "Steam Generator Tube Integrity."

The Nuclear Regulatory Commission staff is reviewing the 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 June 21, 2006, the Entergy staff indicated that a response to the RAI would be provided within 60 days of the date of this letter.

Please contact me at (301) 415-2901 if you have any questions on this issue.

Sincerely,

/RA/

John P. Boska, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:
RAI

cc w/encl: See next page

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Indian Point Nuclear Generating Unit Nos. 2 & 3

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Indian Point Nuclear Generating Unit Nos. 2 & 3

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING STEAM GENERATOR TUBE INTEGRITY TECHNICAL SPECIFICATIONS
ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
DOCKET NOS. 50-247 AND 50-286

In a letter dated May 31, 2006, Agencywide Documents Access and Management System Accession No. ML061590405, Entergy Nuclear Operations, Inc. (Entergy), submitted an application for a proposed amendment to the Technical Specifications (TSs) for Indian Point Nuclear Generating Unit Nos. 2 and 3 which would revise the TSs on steam generator tube integrity per the TS Task Force (TSTF) change document TSTF-449, "Steam Generator Tube Integrity." The Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has the following questions:

1. In proposed TS 5.5.7.a for Unit 2 and TS 5.5.8.a for Unit 3, you indicated that condition monitoring will be performed when steam generator tubes "are inspected, plugged, to confirm" that the performance criteria are being met. Please discuss your plans to correct this apparent typographical error. The phrase should read: "are inspected or plugged."
2. In proposed TS 3.4.17 for Unit 2 and 3, the second limiting condition for operation contains the phrase "[or repaired]" whereas all other references to tube repair have been crossed out. Since repair is not authorized for Unit 2 or 3, please discuss your plans for removing this phrase.
3. In proposed TS 3.4.13, the added text for Action B is not clear. Please confirm that the proposed addition is "OR Primary to secondary leakage not within limit."
4. The proposed wording for the last sentence in TS 5.5.8.b.2 for Unit 3 is not clear. It currently reads: "Leakage is not to exceed 0.3 gpm [gallons per minute] per SG not to exceed 1 gpm total leakage." Please discuss your plans to clarify this sentence in both your proposed TS and in your Bases (page B 3.4.17-3). For example, "Leakage is not to exceed 0.3 gpm per SG and 1 gpm through all SGs."
5. In your proposed Bases, the reference numbers do not appear correct. Please discuss your plans to correct the reference numbers in the Bases. For example:

Insert B 3.4.13 B for Unit 2: Reference 4 in the first paragraph should be Reference 5.

Insert B 3.4.13 D (WOG) for Unit 2: Reference 5 in the first and third paragraph should be Reference 6.

Insert B 3.4.13 B for Unit 3: Reference 4 in the first paragraph should be Reference 3.

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Insert B 3.4.13 D (WOG) for Unit 3: Reference 5 in the first and third paragraph should be Reference 4.

6. In the second paragraph on proposed TS Bases page B 3.4.17-2 for Unit 2, there is reference to General Design Criterion (GDC) 19 and Title 10 of the *Code of Federal Regulations* (10 CFR) Part 100. However, on page B 3.4.13-2, there is reference to a Westinghouse report and NRC Regulatory Guide 1.183. Please confirm that 10 CFR 50.67 is not applicable to your current Unit 2 licensing basis dose assessments.

Similarly, on proposed TS Bases page B 3.4.13-2 for Unit 3, the dose consequences were indicated to be within the limits of 10 CFR 50.67 and the NRC staff approved licensing bases whereas on page B 3.4.17-2, the dose consequences are indicated to be within the limits of GDC19 and 10 CFR 100, or the NRC-approved licensing basis. Please clarify this apparent discrepancy.

7. In your current Unit 3 safety analyses for reactor coolant system operational leakage (refer to page B 3.4.13-2), there is a statement that the 1 gallon per minute (gpm) primary to secondary leakage is relatively inconsequential. You have proposed to change the 1 gpm to 0.9 gpm. Please discuss the basis for revising this limit. In addition, confirm that the 0.9 gpm is consistent with your current licensing basis for Unit 3.
8. On page B 3.4.13-2 of the Unit 3 TS Bases, there is a statement that the safety analysis for the steam line break accident assumes 432 gallons per day primary to secondary leakage through the affected steam generator. This statement appears to be incomplete. Please confirm that your current licensing basis steam line break accident analysis not only assumes 432 gallons per day leakage but also that the total leakage from all steam generators is limited to 1 gpm. If so, discuss your plans to modify your TS Bases. If this is not the case, please confirm the adequacy of insert B 3.4.13A for Unit 3, which indicates that leakage is limited to 1 gpm from all steam generators.
9. In the Unit 3 Bases for Surveillance Requirement (SR) 3.4.13.1 (page B 3.4.13-5), you indicated that the surveillance is modified by two notes. The next statement then starts with "Therefore, this SR...". TSTF-449 indicated that this should have been modified to indicate that "Note 1 states...". Please discuss your plans to modify the Bases to be consistent with TSTF-449.
10. Several of the marked-up TS pages you submitted do not match the previously NRC issued pages. For Unit 2, pages ii, iv, and 1.1-3 were issued by the NRC as Amendment No. 238. For Unit 3, page ii was issued by the NRC as Amendment No. 205, and page iv as Amendment No. 207. Please revise the marked-up pages to show the changes from the NRC issued pages.