Entergy

Entergy Nuclear Northeast
Indian Point Energy Center
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T.R. Jones
Licensing Manager
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June 4, 2007

Re: Indian Point Unit 2
Docket No. 50-247
NL-07-068

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

SUBJECT: **Response to Request for Additional Information Regarding Relief Request RR-04, Use of Performance Demonstration Initiative (TAC No. MD4699)**

REFERENCES:

1. Entergy Letter dated February 28, 2007, P.W. Conroy to Document Control Desk, "4th Ten-Year Interval Inservice Inspection and Containment Inservice Inspection Program Plan at Indian Point Unit 2 (IP2)"

2. NRC letter dated May 10, 2007, J.P. Boska to M.R. Kansler, "Indian Point Nuclear Generating Unit No. 2 – Request for Additional Information Regarding Relief Request RR-04, Use of Performance Demonstration Initiative (TAC No. MD4699)"

Dear Sir or Madam:

By letter dated February 28, 2007 (Reference 1) Entergy Nuclear Operations, Inc. submitted the 4th Ten-Year Interval Inservice Inspection and Containment Inservice Inspection Program Plan for the period March 1, 2007 through April 3, 2016 for IP2. Appendix B of the enclosure contained seven (7) relief requests. The NRC staff requested additional information by letter dated May 10, 2007 (Reference 2) in order to complete its review of Relief Request RR-04. The purpose of this letter is to provide the responses to the questions transmitted in Reference 2. Responses to questions 1 through 2 are provided in Attachment 1 to this letter.

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NRR/NRR

If you have any questions or require additional information, please contact Mr. T.R. Jones, Manager, Licensing at (914) 734-6670.

Sincerely,

T. R. Jones
Licensing Manager
Indian Point Energy Center

Attachments:
1. Response to Request for Additional Information Regarding Relief Request RR-04, Use of Performance Demonstration Initiative (TAC No. MD4699)

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Samuel J. Collins, Regional Administrator, NRC Region I
NRC Resident Inspector's Office, Indian Point 2
Mr. Paul Eddy, New York State Dept. of Public Service

ATTACHMENT 1 TO NL-07-068

Response to Request for Additional Information Regarding Relief Request RR-04, Use of Performance Demonstration Initiative (TAC No. MD4699)

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247

Response to Request for Additional Information Regarding Relief Request RR-04, Use of Performance Demonstration Initiative (TAC No. MD4699)

Responses to the questions contained in the May 10, 2007 Request for Additional Information Regarding Relief Request RR-04, Use of Performance Demonstration Initiative (TAC No. MD4699) are as follows:

1. **Request RR-04, Item 6 (page 5 of 19) does not have a technical basis. Provide the technical basis supporting the use of the proposed alternative to the first sentence in the ASME Code, Section XI, Appendix VIII, Supplement 10, Paragraph 2.0.**

   Response

   Technical Basis - The current Code requires that the inside surface be concealed from the candidate. This makes qualifications conducted from the inside of the pipe (e.g., PWR nozzle to safe end welds) impractical. The proposed alternative differentiates between ID and OD scanning surfaces, requires that they be conducted separately, and requires that flaws be concealed from the candidate. This is consistent with the recent revision to Supplement 2.

2. **Request RR-04, Item 11 (page 6 of 19), illustrates Table VIII-S2-1 with the original and proposed changes. The proposed changes are not clearly identifiable in this table subsequently renamed Table VIII-S10-1.**

   (a) **Clarify the minimum number of units in the detection and false call test acceptance criteria that will be used in the proposed Table VIII-S10-1.**

   (b) **For each flawed grading unit in Table VIII-S10-1, identify the number of unflawed grading units and the maximum of false calls that will be used.**

   Response

   The proposed alternative modifies the acceptance criteria of Table VIII-S2-1 [with a new Table VIII-S10-1] as follows:

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TABLE VIII-S2-1
PERFORMANCE DEMONSTRATION DETECTION TEST ACCEPTANCE CRITERIA

Detection Test Acceptance Critera		False Call Test Acceptance Criteria	
No. of Flawed Grading Units	Minimum Detection Criteria	No. of Unflawed Grading Units	Maximum Number of False Calls
~~5~~	~~5~~	~~10~~	~~0~~
~~6~~	~~6~~	~~12~~	~~1~~
~~7~~	~~6~~	~~14~~	~~1~~
~~8~~	~~7~~	~~16~~	~~2~~
~~9~~	~~7~~	~~18~~	~~2~~
10	8	~~20~~ 15	~~3~~ 2
11	9	~~22~~ 17	~~3~~ 3
12	9	~~24~~ 18	~~3~~ 3
13	10	~~26~~ 20	~~4~~ 3
14	10	~~28~~ 21	~~5~~ 3
15	11	~~30~~ 23	~~5~~ 3
16	12	~~32~~ 24	~~6~~ 4
17	12	~~34~~ 26	~~6~~ 4
18	13	~~36~~ 27	~~7~~ 4
19	13	~~38~~ 29	~~7~~ 4
20	14	~~40~~ 30	~~8~~ 5