From: Kimberly Green
To: <dtyner@entergy.com>,"MICHAEL D STROUD" <MSTROUD@entergy.com>
Date: 10/4/2007 10:04:56 AM
Subject: Telecon Summary of 9/21/07 re Fire Protection and Electrical Draft RAIs
cc: <IPNonPublicHearingFile@nrc.gov>

Donna and Mike,

Attached is the draft telecon summary of 9/21/07 regarding our discussion of the draft RAIs on fire protection and electrical systems. Please look over and notify me of any discrepancies or inaccuracies.

Thanks,
Kim

Hearing Identifier: IndianPointUnits2and3NonPublic
Email Number: 191

Mail Envelope Properties (47669826.HQGWDO01.OWGWPO04.200.2000008.1.15729E.1)

Subject: Telecon Summary of 9/21/07 re Fire Protection and Electrical Draft RAIs
Creation Date: 10/4/2007 10:04:56 AM
From: Kimberly Green

Created By: KJG1@nrc.gov

Recipients
<IPNonPublicHearingFile@nrc.gov>
<dtyner@entergy.com>
"MICHAEL D STROUD" <MSTROUD@entergy.com>

Post Office	**Route**
OWGWPO04.HQGWDO01	nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	240	10/4/2007 10:04:56 AM
Telecon Summary 09-21-07.doc	91136	12/17/2007 3:39:18 PM

Options
Priority: Standard
Reply Requested: No
Return Notification: None
None

Concealed Subject: No
Security: Standard

LICENSEE: Entergy Nuclear Operations, Inc.

FACILITY: Indian Point Nuclear Generating, Units 2 and 3

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON SEPTEMBER 21, 2007, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND ENTERGY NUCLEAR OPERATIONS, INC., CONCERNING DRAFT REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE INDIAN POINT NUCLEAR GENERATING, UNITS 2 AND 3, LICENSE RENEWAL APPLICATION

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Entergy Nuclear Operations, Inc. held a telephone conference call on September 21, 2007, to discuss and clarify the staff's draft requests for additional information (D-RAIs) concerning the Indian Point Nuclear Generating, Units 2 and 3, license renewal application. The telephone conference call was useful in clarifying the intent of the staff's D-RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the D-RAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

Kimberly Green, Safety Project Manager
License Renewal Branch RLRB
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosures:
1. List of Participants
2. List of Draft Requests for Additional Information

cc w/encls: See next page

LICENSEE: Entergy Nuclear Operations, Inc.

FACILITY: Indian Point Nuclear Generating, Units 2 and 3

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON SEPTEMBER 21, 2007, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND ENTERGY NUCLEAR OPERATIONS, INC., CONCERNING DRAFT REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE INDIAN POINT NUCLEAR GENERATING, UNITS 2 AND 3, LICENSE RENEWAL APPLICATION

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Entergy Nuclear Operations, Inc. held a telephone conference call on September 21, 2007, to discuss and clarify the staff's draft requests for additional information (D-RAIs) concerning the Indian Point Nuclear Generating, Units 2 and 3, license renewal application. The telephone conference call was useful in clarifying the intent of the staff's D-RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the D-RAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

Kimberly Green, Safety Project Manager
License Renewal Branch RLRB
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosures:
1. List of Participants
2. List of Draft Requests for Additional Information

cc w/encls: See next page
DISTRIBUTION: See next page
ADAMS Accession No.:
DOCUMENT NAME: G:\ADRO\DLR\RLRB\Green\Indian Point\Telecon Summaries\Telecon Summary 09-21-07.doc

OFFICE	LA:DLR	PM:RLRB:DLR	BC:RLRB:DLR
NAME		KGreen	RAuluck
DATE	/ /	/ /	/ /

OFFICIAL RECORD COPY

TELEPHONE CONFERENCE CALL
INDIAN POINT NUCLEAR GENERATING, UNITS 2 AND 3
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
SEPTEMBER 21, 2007

PARTICIPANTS	AFFILIATIONS
Kim Green	NRC
Naeem Iqbal	NRC
Phil Qualls	NRC
Bo Pham	NRC
Mike Stroud	Entergy
Alan Cox	Entergy
Ted Ivy	Entergy
Roger Rucker	Entergy
Leland Loyd	Entergy
Randy Smith	Entergy
Don Curry	Entergy
George Dahl	Entergy
Donna Tyner	Entergy
Charlie Caputo	Entergy

DRAFT REQUESTS FOR ADDITIONAL INFORMATION
INDIAN POINT NUCLEAR GENERATING, UNITS 2 AND 3
LICENSE RENEWAL APPLICATION

SEPTEMBER 21, 2007

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Entergy Nuclear Operations, Inc. held a telephone conference call on September 21, 2007, to discuss and clarify the following draft requests for additional information (D-RAIs) concerning the Indian Point Nuclear Generating (IPNG), Units 2 and 3 license renewal application (LRA).

D-RAI 2.3.3.11-1

The following LRA drawings show fire protection system components as out of scope:

LRA drawing LRA-227551-0 shows following fire protection system's components out of scope (i.e., not colored in green):

- M.O. Building
- PAB and BAB Charcoal Filter Deluge System

LRA drawing LRA-227552-0 shows following fire protection system's components out of scope (i.e., not colored in green):

- #11 Fire Pump Room
- Fuel Oil Tank/Water Meter House
- Ignition Oil Tank and Pump Room Deluge System
- Main and Auxiliary Transformer Deluge System

LRA drawing LRA-227553-0 shows following fire protection system's components out of scope (i.e., not colored in green):

- Staircase No. 2, 3, 4, 5 and 6
- Turbine Oil Piping System

LRA drawing LRA-227554-0 shows following fire protection system's components out of scope (i.e., not colored in green):

- Staircase No. 1, 8, and 9

LRA drawing LRA-9321-40903-0 shows following fire protection system's components out of scope (i.e., not colored in green):

- FP-T-4 Pneumatic Tank and Components

LRA drawing LRA-9321-20913-001-0 shows following fire protection system's components out of scope (i.e., not colored in green):

- Turbine Generator Building Automatic Deluge System.

- Turbine Building Wall Spray System No. 3.
- Yard Transformer Separation
- Main Transformer No. 31
- Main Transformer No. 32
- Unit Auxiliary Transformer
- Station Auxiliary Transformer
- North Half Sprinkler No. 6
- Boiler Room Sprinkler System
- Sprinkler System for Auxiliary Feed Water Pump Room
- Lube Oil Storage Tank
- Lube Oil Reservoir
- Manual/Spray System No. 2, Boiler Feed Pump
- H2 Seal Oil Unit
- Manual Boiler Feed Pump Oil Accumulators No. 31 and 32
- Boiler Feed Console Pump

The staff requests that the applicant verify whether the above components are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If these components are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI. During the telecon, the staff added asked about fire hydrants, hose reels, and hose connections on LRA drawing LRA-9321-4006-0. The applicant understands the question and acknowledged that this additional request will be added to the formal RAI.

D-RAI 2.3.3.11-2

LRA Section 2.3.3.11 discusses requirements for the fire water supply system but does not mention trash racks and traveling screens for the fire pump suction water supply. Trash racks and traveling screens are located upstream of the fire pump suctions to remove any major debris from fresh or raw water. Trash racks and traveling screens are necessary to remove debris from and prevent clogging of the fire protection water supply system. Trash racks and traveling screens are typically considered to be passive, long-lived components. Both trash racks and traveling screens are located in a fresh or raw water/air environment and are typically constructed of carbon steel. Carbon steel in a fresh or raw water environment or water/air environment is subject to loss of material, pitting, crevice formation, and microbiologically influenced corrosion, and fouling. The staff requests that the applicant explain the apparent exclusion of the trash racks and traveling screens that are located upstream of the fire pump suctions from the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1).

Discussion: The applicant referred the staff to license renewal drawing LRA-9231-4006 at location H4. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.11-3

Section 3.13.B of the SER dated November 30, 1977, discusses the electrical tunnel fire protection water spray system, diesel generator water spray system, and containment fan cooler charcoal filter. These water spray systems do not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether these water spray systems for the electrical tunnel, diesel generator building, and containment fan cooler charcoal filter are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawing LRA-227551-0, details B and C. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.11-4

Section 5.8.4 of the SER dated January 31, 1979, discusses the cable tunnel closed head pre-action sprinkler system. The closed head pre-action sprinkler system does not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the closed head pre-action sprinkler system to cover the cable trays at multiple levels in cable tunnel is in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawing LRA-227551-0, detail B. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.11-5

Section 3.1.5 of the SER dated March 6, 1979, discusses two 2500 gpm fire pumps, one electric motor driven and one diesel engine driven, along with two jockey pumps. The two jockey pumps and their associated components do not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the jockey pumps and their associated components are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawings LRA-227553-0 and . LRA-9321-40903-0. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.11-6

Section 3.1.8 of the SER dated March 6, 1979, discusses dry-pipe pre-action sprinkler systems for all cable trays in the electrical tunnels, electrical penetration areas, and cable trays in the motor control center areas. The dry-pipe pre-action sprinkler systems do not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the dry-pipe pre-action sprinkler systems for all cable trays in the electrical tunnels, electrical penetration areas, and cable trays in the motor control

center areas are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.11-7

Section 5.9.1 of the SER dated March 6, 1979, discusses automatic deluge foam suppression systems for various areas in turbine building. The foam suppression systems do not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the foam suppression systems for various areas in the turbine building are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.11-8

Section 5.11.1 of the SER dated March 6, 1979, discusses wet pipe automatic sprinklers in the diesel generator building sump area beneath each diesel engine and on the diesel day tank. The wet pipe automatic sprinkler system does not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the wet pipe sprinkler system to protect the diesel generator building sump area and diesel day tank is in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawings LRA-9321-40913-0 and LRA-227551-0. However, the information at location E3 of LRA-9321-40913-0 needs additional clarification from the applicant. Therefore, the staff will revise this question as follows. The revised question will be sent as a formal RAI.

> Section 5.11.1 of the SER dated March 6, 1979, discusses wet pipe automatic sprinklers in the diesel generator building sump area beneath each diesel engine and on the diesel day tank. On license renewal drawing LRA-9321-40913-0 at location E3, the wet pipe automatic sprinkler system does not appear to be within the scope of the license renewal and subject to an AMR, i.e., the box surrounding the sprinklers in question are not highlighted. The staff requests that the applicant verify whether the wet pipe sprinkler system to protect the diesel generator building sump area and diesel day tank is within the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of

license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

D-RAI 2.3.3.11-9

Section 5.13.1 of the SER dated March 6, 1979, discusses the charcoal filter manual water spray system. The manual water spray system and its associated components do not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the charcoal filter manual water spray system and its associated components are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.11-10

Section 5.15.1 of the SER dated March 6, 1979, discusses automatic water spray systems for oil-filled transformers located adjacent to the control building. The automatic water spray systems and their associated components do not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the automatic water spray systems for oil-filled transformers are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.11-11

Section 2.1 of the SER dated May 2, 1980, discusses an automatic water curtain to protect an 8' wide x 12' high opening in the primary auxiliary building. The automatic water curtain and its associated components do not appear in LRA Section 2.3.3.11 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the automatic water curtain is in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant stated that referred the staff to license renewal drawing LRA-9321-40913-0, location F4. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.11-12

LRA Tables 2.3.3-11-IP2 and 2.3.3-11-IP3 exclude several types of fire protection components that appear in the SERs and/or UFSAR, and which also appear in the LRA drawings colored in green. These components are listed below:

- hose connections
- hose racks
- yard hose houses
- interior fire hose stations
- pipe fittings
- pipe supports
- couplings
- threaded connections
- restricting orifices
- interface flanges
- chamber housings
- heat-actuated devices
- tank heaters
- thermowells
- water motor alarms
- expansion joint
- filter housing
- gear box housing
- heat exchanger (bonnet)
- heat exchanger (shell)
- heat exchanger (tube)
- heater housing
- diesel driven fire pump engine's muffler
- orifice
- sight glass
- strainer housing
- turbocharger housing
- flexible hose
- latch door pull box
- pneumatic actuators
- actuator housing
- dikes for oil spill confinement
- buried underground fuel oil tanks for emergency diesel generators
- expansion tank
- fire water main loop valves
- post indicator valves
- jacket cooling water keepwarm pump and heater
- lubricating oil collection system components for each reactor coolant pump
- lubricating oil cooler
- auxiliary lubricating oil makeup tank
- rocker lubricating oil pump
- floor drains and curbs for fire-fighting water
- backflow prevention devices
- flame retardant coating for cables
- fire retardant coating for structural steel supporting walls and ceilings

For each, determine whether the component should be included in Tables 2.3.3-11-IP2 and 2.3.3-11-IP3, and if not, justify the exclusion.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.12-1

The following LRA drawings show fire protection system components as out of scope:

LRA drawing LRA-9321-24403-0 shows following fire protection system's components out of scope (i.e., not colored in brown):

- Appendix R Diesel Generator Halon 1301 System
- TSC/Plant Computer Halon System
- Record Room Vault Halon 1301 System for Unit 3

LRA drawing LRA-D-8775-002-0 shows the following fire protection system's components out of scope (i.e., not colored in brown):

- Cable Spreading Room (CSR) Halon 1301 System

The staff requests that the applicant verify whether the above components are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If these components are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawing LRA-8775-005-0. The information contained on this drawing eliminates a portion of the staff's question. Therefore, the staff will revise this question as follows. The revised question will be sent as a formal RAI.

> The following LRA drawings show fire protection system components as out of scope:
>
> LRA drawing LRA-9321-24403-0 shows following fire protection system's components out of scope (i.e., not colored in brown):
>
> - Appendix R Diesel Generator Halon 1301 System
> - TSC/Plant Computer Halon System
> - Record Room Vault Halon 1301 System for Unit 3
>
> The staff requests that the applicant verify whether the above components are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If these components are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

D-RAI 2.3.3.12-2

Section 5.4.1 of the SER dated January 31, 1979, discusses the manually actuated CSR Halon total flooding fire suppression system. The total flooding Halon fire suppression system does not appear in LRA Section 2.3.3.12 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the CSR Halon fire suppression system is in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawings LRA-8775-002-0, LRA-8775-004-0, and LRA-8775-005-0. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.12-3

Section 3.1.9 of the SER dated March 6, 1979, discusses a total flooding carbon dioxide (CO2) system for the switchgear room. The total flooding CO2 fire suppression system does not appear in LRA Section 2.3.3.12 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether switchgear room total flooding CO2 fire suppression system is in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the CO2 system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawing LRA-9321-24403-0. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.12-4

Section 2.2 of the SER dated May 2, 1980, discusses the total flooding CO2 fire suppression system for the diesel generator rooms. The CO2 fire suppression systems do not appear in LRA Section 2.3.3.12 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the diesel generator rooms' CO2 total flooding fire suppression systems are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the CO2 systems are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawing LRA-9321-24403-0. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.12-5

Section 2.6 of the SER dated May 2, 1980, discusses the switchgear room automatic total flooding CO2 fire suppression system. The CO2 fire suppression system does not appear in LRA Section 2.3.3.12 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the switchgear room automatic total flooding CO2 fire suppression system is in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is

excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawing LRA-9321-24403-0. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.12-6

Section 2.7 of the SER dated May 2, 1980, discusses an automatic total flooding CO2 fire suppression system for the CSR. The automatic total flooding CO2 fire suppression system does not appear in LRA Section 2.3.3.12 as being in the scope of the license renewal and subject to an AMR. The staff requests that the applicant verify whether the CSR automatic total flooding CO2 fire suppression system is in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If the system is excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant referred the staff to license renewal drawing LRA-9321-24403-0. Therefore, this question is withdrawn and will not be sent as a formal RAI.

D-RAI 2.3.3.12-7

LRA Tables 2.3.3-12-IP2 and 2.3.3-12-IP3 excludes several types of CO2 and Halon 1301 fire suppression system components that appear in the SERs and/or UFSAR, and which also appear in the LRA drawings colored in brown. These components are listed below:

- strainer housings
- pipe fittings
- pipe supports
- couplings
- odorizer
- threaded connections
- flexible hose
- latch door pull box
- pneumatic actuators

For each, determine whether the component should be included in LRA Tables 2.3.3-12-IP2 and 2.3.3-12-IP3, and if not, justify the exclusion.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.5-1

General Design Criterion 17 of Title 10 Code of Federal Regulations Part 50 (10 CFR Part 50), Appendix A, requires that electric power from the transmission network to the onsite electric distribution system be supplied by two physically independent circuits to minimize the likelihood

of their simultaneous failure. In addition, the guidance provided by letter dated April 1, 2002, "Staff Guidance on Scoping of Equipment Relied on to Meet the Requirements of the Station Blackout (SBO) Rule (10 CFR 50.63) for License Renewal (10 CFR 54.4(a)(3))," states:

For purposes of the license renewal rule, the staff has determined that the plant system portion of the offsite power system that is used to connect the plant to the offsite power source should be included within the scope of the rule. This path typically includes switchyard circuit breakers that connect to the offsite system power transformers (startup transformers), the transformers themselves, the intervening overhead or underground circuits between circuit breaker and transformer and transformer and onsite electrical system, and the associated control circuits and structures. Ensuring that the appropriate offsite power system long-lived passive structures and components that are part of this circuit path are subject to an aging management review will assure that the bases underlying the SBO requirements are maintained over the period of extended license.

According to the above, both paths, from the safety-related 480 Volt (V) buses to the first circuit breaker from the offsite line, used to control the offsite circuits to the plant should be age managed. The guidance does not specify that the switchyard is not part of the plant system nor that the switchyard does not need to be included in the scope of license renewal. Explain in detail which high voltage breakers and other components in the switchyard will be connected from the startup transformers up to the offsite power system for the purpose of SBO recovery.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.5-2

NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," Appendix B indicates that elements, resistance temperature detectors (RTDs), sensors, thermocouples and transducers should be included in the list of components/commodity groups subject to an aging management review (AMR) if a pressure boundary is applicable. Explain why these components are not included in Section 2.5 of the LRA.

Discussion: The applicant stated that LRA Section 2.1.3.1 provides an explanation; however, this information did not address the staff's concern in its entirety. Therefore, this D-RAI will be sent as a formal RAI.

D-RAI 2.5-3

NEI 95-10, Appendix B indicates that electrical splices, terminal blocks, control cables and isolated-phase bus should be included in the commodity group of "cables & connections, bus, electrical portions of electrical and I&C penetration assemblies." Explain why these components are not included in Section 2.5 of the LRA.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.