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Fred Dacimo
Vice President
License Renewal

May 28, 2008

Re: Indian Point Units 2 & 3
Docket Nos. 50-247 & 50-286

NL-08-090

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

SUBJECT: **Reply to Request for Additional Information
Regarding License Renewal Application –
Metal Enclosed Buses and Fire Protection**

Reference: NRC letter dated April 29, 2008; "Request for Additional Information for the Review of the Indian Point Nuclear Generating Unit Nos. 2 and 3, License Renewal Application – Metal Enclosed Buses and Fire Protection"

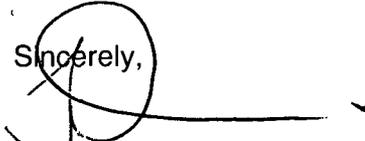
Dear Sir or Madam:

Entergy Nuclear Operations, Inc is providing, in Attachment I, the additional information requested in the referenced letter pertaining to NRC review of the License Renewal Application for Indian Point 2 and Indian Point 3. The additional information provided in this transmittal addresses staff questions for Metal Enclosed Buses and Fire Protection.

There are no new commitments identified in this submittal. If you have any questions or require additional information, please contact Mr. R. Walpole, Manager, Licensing at (914) 734-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 5-28-08.

Sincerely,


Fred R. Dacimo
Vice President
License Renewal

A006
A128
NPR

Attachment:

1. Reply to NRC Request for Additional Information Regarding License Renewal Application – Metal Enclosed Buses and Fire Protection

cc: Mr. Bo M. Pham, NRC Environmental Project Manager
Ms. Kimberly Green, NRC Safety Project Manager
Mr. John P. Boska, NRC NRR Senior Project Manager
Mr. Samuel J. Collins, Regional Administrator, NRC Region I
Mr. Sherwin E. Turk, NRC Office of General Counsel, Special Counsel
IPEC NRC Senior Resident Inspectors Office
Mr. Paul D. Tonko, President, NYSERDA
Mr. Paul Eddy, New York State Dept. of Public Service

ATTACHMENT I TO NL-08-090

REPLY TO NRC REQUEST FOR ADDITIONAL INFORMATION

REGARDING

LICENSE RENEWAL APPLICATION

Metal Enclosed Buses and Fire Protection

ENERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 and 3
DOCKETS 50-247 and 50-286

INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
LICENSE RENEWAL APPLICATION (LRA)
REQUESTS FOR ADDITIONAL INFORMATION (RAI)
METAL ENCLOSED BUSES AND FIRE PROTECTION

The U.S. Nuclear Regulatory Commission (NRC or staff) has reviewed the information related to Metal Enclosed Buses and Fire Protection provided by the applicant in the Indian Point Nuclear Generating Unit Nos. 2 and 3 (IP2 and IP3) LRA. The staff has identified that additional information is needed to complete the review as addressed below.

RAI 3.6.2.3-1

License renewal application (LRA), Table 3.6.1, under Item Number 3.6.1-10, "Metal enclosed bus – Enclosure assemblies," states that the only elastomers are access door gaskets and are considered consumables. NUREG-1801, Volume 2, Item VI.A-12, identifies elastomers as a commodity type that requires an aging management review (AMR). Confirm that for in-scope metal enclosed buses, there are no other elastomers or gaskets other than the access door gaskets. For access door elastomers, provide a technical justification of why these components are excluded from an AMR.

Response for RAI 3.6.2.3-1

Based on site documents, the in-scope 6.9 kV and the 480 V metal-enclosed bus does not contain elastomers except for the gaskets that provide a seal around the edge of the access covers. During the period of extended operation, the access cover gasket will be replaced periodically in conjunction with preventive maintenance inspections. Since the access cover gasket is replaced based on a specified time period, it is not subject to aging management review per 10 CFR 54.21(a)(1)(ii).

RAI 3.0.3.2.7-2

In response to RAI 3.0.3.2.7-1 in a letter dated March 12, 2008, Entergy states that fire stops (penetration seals) are visually inspected at least once every seven operating cycles (15% every 24 months). During an audit, the NRC staff reviewed bases documents (for Indian Point Unit 3) associated with the fire protection AMP. One of the bases documents states that 15% of fire seals located in fire barriers are demonstrated to be operable by visual inspection on a frequency of 24 months. However, for those penetration seals that are inaccessible, the frequency of inspection is given as "not required." Justify the lack of visual inspections of inaccessible penetration seals.

Response for RAI 3.0.3.2.7-2

As provided in response to RAI 3.0.3.2.7-1 penetration seals are inspected at least once every seven operating cycles. However, IP3 site surveillance procedure provides provisions for cases where a penetration seal may become inaccessible for periodic inspection as result of a plant configuration changes (i.e., installation of new plant equipment, walls, barriers, or other obstacles). In such cases, the IP3 site procedure includes guidance for the cessation of periodic

surveillance of such penetration seals, subject to preparation of a formal fire protection engineering evaluation justifying the discontinuance of periodic visual surveillance.

As stated in the IP3 bases document, the visual inspection of inaccessible penetration seals is "not required" if justified by a supporting fire protection engineering evaluation, developed in accordance with the guidance of Generic Letter (GL) 86-10. On a case-by-case basis, the inaccessibility of any such penetration seal must be justified, and the fire protection adequacy of the configuration must be demonstrated. The evaluation, as stated in the bases document, must include assessment of proximate combustible loading, mitigating features, and the consequences of potential failure of the affected seal.

If the formal fire protection engineering evaluation (prepared in accordance with guidance of GL 86-10) demonstrates that the penetration seal is inaccessible for inspection, that the fire challenge to the barrier is insubstantial, and the consequences of failure of the seal would not compromise fire safety or nuclear safety, then periodic surveillance of that specific seal is not required.