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**J.E. Pollock**  
Site Vice President  
Administration

July 30, 2008

Indian Point Unit 2  
Docket No. 50-247  
NL-08-094

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

Subject: Exigent License Amendment Request to the  
Allowable Completion Time for Offsite AC Sources

Dear Sir or Madam:

Pursuant to 10 CFR 50.90 and 10 CFR 50.91(a)(6), Entergy Nuclear Operations, Inc (Entergy) hereby requests an exigent amendment to the Indian Point 2 (IP2) Operating License DPR-26. The proposed change to Technical Specification (TS) 3.8.1 would allow a one time extension to the completion time of Required Action A.4 to support replacement of one of the Station Auxiliary Transformer (SAT) cooling oil pumps.

The SAT has two cooling banks with one bank necessary to maintain operability of the transformer. One cooling bank is currently unavailable due to a failed oil pump. Restoration of the unavailable cooling bank is desired to improve SAT reliability. Maintenance to replace the failed cooling pump is expected to take 60 hours and needs to be pursued as soon as possible to restore all normal cooling. Recognizing that problems can occur, Entergy is requesting a one time extension of the completion time from 72 hours to 144 hours. This change request meets the criterion for an exigent change under 10 CFR 50.91(a)(6) because the failure of the cooling pump was not anticipated and the maintenance is considered to be urgent.

ACD  
NRR

Entergy has evaluated the proposed change in accordance with 10 CFR 50.91 (a)(1) using the criteria of 10 CFR 50.92 (c) and has determined that this proposed change involves no significant hazards considerations, as described in Attachment 1. The proposed changes to the Technical Specification are shown in Attachment 2. There are no planned changes to the Bases. This submittal contains commitments in Attachment 3.

A copy of this letter with the attachments containing the proposed changes, safety evaluation and marked up Technical Specification pages is being provided as required by 10 CFR 50.91 to the designated New York State official. If you have any questions, please contact Mr. Robert Walpole, Licensing Manager, at (914) 734-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 30, 2008.

Sincerely,



J. E. Pollock  
Site Vice President  
Indian Point Energy Center

Attachments:

1. Analysis of Proposed License Amendment Request Regarding the Allowable Completion Time for Offsite AC Sources
2. Markup of Technical Specification Page Regarding the Allowable Completion Time for Offsite AC Sources
3. Commitments

cc: Mr. Samuel J. Collins, Regional Administrator, NRC Region 1  
Mr. John P. Boska, Senior Project Manager, NRC NRR DORL  
NRC Resident Inspectors Office, Indian Point 2  
Mr. Paul Eddy, NYS Department of Public Service  
Mr. Paul D. Tonko, President, NYSERDA

**ATTACHMENT 1 TO NL-08-094**

**ANALYSIS OF PROPOSED LICENSE AMENDMENT REQUEST  
REGARDING THE ALLOWABLE COMPLETION TIME  
FOR OFFSITE AC SOURCES**

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

## **1.0 DESCRIPTION**

Pursuant to 10 CFR 50.90 and 10 CFR 50.91(a)(6), Entergy Nuclear Operations, Inc (Entergy) hereby requests an exigent amendment to the Indian Point 2 (IP2) Operating License DPR-26. Entergy is planning required maintenance on one of the two Station Auxiliary Transformer (SAT) cooling oil pumps. Although the SAT remains operable, Entergy is planning to perform this maintenance as soon as possible to reduce the possibility of loss of SAT cooling. This change request is being made because Entergy is concerned that the duration may exceed the completion time of Technical Specification (TS) 3.8.1, Required Action A.4. This change request meets the criterion for an exigent change under 10 CFR 50.91(a)(6) because the failure of the cooling pump was not anticipated and the maintenance is considered to be urgent. This creates the potential for the 72 hour completion time to be exceeded with no option for extension.

The proposed change is a one time extension to the completion time for TS 3.8.1, Required Action A.4 to allow replacement of the SAT cooling oil pump. The cooling oil pump replacement requires removal of the SAT from service which makes the 138 kV offsite power source inoperable. The cooling oil pump replacement is expected to take 60 hours which leaves little or no margin to the current completion time. Entergy recognizes that circumstances (e.g., delays in the removal of the old pump or installation of the new pump, additional work activities identified when the old pump is removed, or anomalies detected during the testing of the new oil pump while in place) may require some extension of the scheduled work and is therefore requesting a one time change to extend the completion time from 72 to 144 hours.

## **2.0 PROPOSED CHANGE**

Proposed change to TS 3.8.1, Completion Time for Required Action A.4 is identified below:

Indian Point 2 TS 3.8.1, Completion Time for Required Action A.4 currently says:

“72 hours”

The proposed amendment will revise the Completion Time for Required Action A.4 to read:

“72 hours

OR

144 hours for a one time maintenance outage on the Station Auxiliary Transformer to be completed as conditions allow in 2008”

There are no changes required to the Bases.

## **3.0 BACKGROUND**

The one time TS change is needed to replace a failed Station Auxiliary Transformer (SAT) cooling oil pump. The cooling oil pump replacement requires removal of the SAT from service which makes one of the offsite power circuits, the 138 kV power circuit, inoperable. During the maintenance, the plant will be operating on the remaining operable 13.8 kV power circuit.

Normally there are two banks of cooling in operation on the SAT. Each bank consists of one cooling oil pump and three cooling fans. One bank is in constant operation and called the lead bank. The second bank, known as the lagging bank, starts when the local hot spot temperature detector senses a temperature of 75°C. The local hot spot temperature detector is monitoring winding temperature for hot spots. In the current degraded condition of the SAT cooling system, a local hot spot temperature of 75°C or higher will not be reduced since the second bank of cooling is not available, which could result in accelerated degradation to the transformer winding insulation. Loss of the lead bank with the lagging bank already out of service would require shutdown of the transformer.

Offsite power is required by Technical Specifications to be supplied from the offsite transmission network to the plant by two electrically and physically separated circuits (a 138 kV circuit and a 13.8 kV circuit). During normal operations, offsite power enters the plant via 6.9 kV buses 5 and 6 which are normally connected to the 138 kV offsite circuit. Both buses have the ability to be manually connected to the 13.8 kV offsite circuit. The 138 kV offsite circuit satisfies the requirement in GDC 17 that at least one of the two required circuits can, within a few seconds, provide power to safety-related equipment following a loss-of-coolant accident. The 13.8 kV offsite circuit is considered a delayed access circuit because operator action is normally required to supply offsite power to the plant using the 13.8 kV offsite source.

For the 138 kV offsite circuit, IP2 has a dedicated Station Auxiliary Transformer (SAT) that can be supplied by either the preferred (95332) or the backup (95331) 138 kV feeder. The 138 kV offsite circuit is designed to supply all IP2 loads, including four operating Reactor Coolant Pumps (RCPs) and Engineered Safety Features (ESF) loads, when using either the preferred or backup feeder. There are no restrictions when IP2 and IP3 are both using the same 138 kV feeder concurrently.

For the 13.8 kV offsite circuit, there is a separate 13.8 kV/6.9 kV auto-transformer associated with each of two feeders (13W92 and 13W93). Feeder 13W92 and its associated auto-transformer is the preferred feeder for the IP2 13.8 kV circuit and the backup feeder for the IP3 13.8 kV circuit. Feeder 13W93 and its associated auto-transformer is the backup feeder for the IP2 13.8 kV circuit and the preferred feeder for the IP3 13.8 kV circuit.

The plant distribution system is configured around 6.9 kV buses 1, 2, 3, 4, 5, and 6. All offsite power to the safeguards buses enters the plant via buses 5 and 6, normally supplied by the 138 kV offsite circuit but may be manually loaded on the 13.8 kV offsite circuit. When the plant is operating, 6.9 kV buses 1, 2, 3, and 4 receive power from the main generator via the unit auxiliary transformer (UAT). However, when the main generator or UAT is not capable of supporting this arrangement, 6.9 kV buses 1 and 2 receive offsite power via 6.9 kV bus 5 and 6.9 kV buses 3 and 4 receive offsite power via 6.9 kV bus 6. Following a unit trip, 6.9 kV buses 1, 2, 3, and 4 will auto transfer (fast bus transfer) to 6.9 kV buses 5 and 6 in order to receive offsite 138 kV offsite power. When 138 kV power is unavailable, the fast bus transfer is taken out of service due to the inability to power all the loads (e.g., four reactor coolant pumps).

The 6.9 kV buses 2, 3, 5 and 6 supply power to the 480 V safeguards power buses 2A, 3A, 5A, and 6A, respectively, using 6.9 kV/480 V station service transformers (SSTs). The onsite safeguards AC Power Distribution System begins with the four 480 V safeguards power buses 5A, 6A, 2A and 3A. The onsite standby power source consists of three 480 V diesel generators (DGs) with a separate DG dedicated to each of the safeguards power trains. Safeguards power train 5A (480 V bus 5A) is supported by DG 21; safeguards power train 6A (480 V bus 6A) is supported by DG 23; and safeguards power train 2A/3A (480 V buses 2A and 3A) is supported by DG 22.

#### 4.0 TECHNICAL ANALYSIS

This is a deterministically based technical specification change. An extension of 72 hours to the completion time of Required Action A.4 is needed to assure that sufficient time is available to complete the cooling system maintenance without causing any unnecessary plant shutdowns. The risk associated with the extension has been compensated for by a number of actions that are described below. The 72 hour extension was determined to be a reasonable time to resolve any unforeseen issue such as delays in the removal of the old pump or installation of the new pump, additional work activities identified after the old pump is removed and the location inspected, or anomalies detected during the testing of the new oil pump while in place. The maintenance requires the oil level in the SAT to be reduced in order to remove the old pump. The new oil pump would then be installed and testing performed.

Engineering has evaluated the possibility of restoring the SAT to service if problems were to be discovered that required an extension of work beyond 72 hours and determined that it is not practical. The schedule calls for completion of the pump replacement and starting to draw vacuum on the SAT in about 32 hours. The restorative work of holding the vacuum, refilling the oil in the SAT, installing the transformer links and removing the protective tag outs will take about 38 hours. This would remain a constant each time the SAT is removed from service.

The SAT is currently operable. However, the present condition does not provide the capability for cooling if there are hot spots and a failure in the remaining cooling bank represents a shutdown risk. An Operational Decision Making Issue (ODMI) has been written with three trigger points (i.e., high winding temperature of  $\geq 117^{\circ}\text{C}$ , high oil temperature of  $\geq 90^{\circ}\text{C}$ , or loss of any remaining cooling) and defined actions to reduce the temperature or remove the transformer from service. This provides an additional assurance of continued operability of the SAT for unplanned events and can result in several actions including plant shutdown.

When the SAT is taken out of service the loss of one source of offsite power will require entry into TS 3.8.1, Condition A. The required actions for Condition A are: 1) verify correct breaker alignment and indicated power availability for the remaining offsite circuit; 2) verify automatic transfer of 6.9 kV buses 1, 2, 3, and 4 to 6.9 kV bus 5 and 6 is disabled when the 138 kV circuit is unavailable; and , 3) declare inoperable all required feature(s) with no offsite power automatically available when its redundant required feature(s) is inoperable. The unavailability of the SAT is already considered in design. The plant TS recognize that there are two sources of offsite power and that each is adequate to support safety related loads given a plant event or shutdown. The proposed increase in completion time has no effect on the capability of the 13.8 kV power supply to perform as required.

During the planned maintenance the plant will be operating on the 13.8 kV offsite power source. Operation on the 13.8 kV power source is not the normal mode of operation. The impact of turbine trip and loss of offsite power is more significant due to the greater unavailability of equipment. Therefore, the operator response to the event is made more difficult. On a turbine trip the reactor coolant pumps are lost (limited return to operation is available due to auto-transformer limits) so natural circulation is depended upon for initial cooling. If offsite power is still available, manual action is required to restore power to the 2A / 3A bus. A loss of the turbine results in the loss of the unit auxiliary transformer (UAT) which supplies power to the 6.9 kV busses 1 to 4. There is no fast bus transfer while on 13.8 kV power so the power to the reactor coolant pumps and other large loads is lost, and the 480 V Bus 2A / 3A is not automatically connected to onsite power when 6.9

kV busses 1 to 4 are lost.

In order to minimize the risk associated with the extension of the completion time a number of actions will be taken. These actions will be controlled under the procedural requirements for an Infrequently Performed Test or Evolution (IPTE). The following actions will be taken:

- Equipment in the TS relied upon for postulated transients and accidents will be administratively controlled and protected to ensure the equipment remains operable and available for the duration of the planned SAT outage. This equipment includes the EDGs, the turbine driven and motor driven Auxiliary Feedwater pumps, Service Water, Component Cooling Water, etc. Protection includes any planned activities to remove TS equipment from service for testing and / or maintenance.
- Procedures will be developed and issued for using the Unit 3 Appendix R diesel and the Unit 2 Appendix R / SBO diesel as backup power supplies for the Unit 2 emergency diesel generators.
- Operations will restrict plant work activities with the potential to create a plant trip. This includes hot work limitations.
- Equipment used during normal operation that is not in TS but would be useful for any transient or accident (e.g., charging pumps, primary water pumps), will be powered from buses 5A and 6A to the extent feasible. This eliminates the potential for that equipment to be stripped.
- During this extended outage time all activity in the switchyards will be closely monitored and controlled. There will be no elective switchyard work (Consolidated Edison will be contacted to assure they are not performing elective work in the switchyard) that could challenge the operability of the 13.8 kV offsite power supply.
- The Grid operator will be consulted regarding grid stability prior to removal of the SAT from service.
- The work planning will consider weather conditions. Work planning will consider the weather forecast and avoid times when there will be a strain on the grid. There will be discussions with the grid operator. Similarly, the work will not be planned during the periods when severe weather is forecast. The work is projected to be complete in less than three days but may take up to six days so the work window is well within the short term weather forecast window.
- Alternate power sources will be kept available for the duration while the SAT is inoperable. The alternate power sources are as follows:
  - (1) If the loss of 13.8 kV power occurs due to a failure of the autotransformer associated with preferred feeder 13W92 then feeder 13W93 with its autotransformer is available as a backup source of offsite power. There are procedural controls for the use of one 13.8 kV feeder for both units. Power can be restored in 60 minutes.
  - (2) The Emergency Diesel Generators, which normally provide on-site AC power with a loss of offsite power, will be maintained operable.

- (3) The Unit 3 Appendix R diesel is available to supply power to the Unit 2 480 V buses. This diesel normally supplies 2,500 kW at 6.9 kV and can be started and manually load sequenced within 60 minutes. The Unit 3 Appendix R diesel can be aligned to supply power to the 6.9 kV buses 5 or 6 which can be routed to any of the 480 volt buses. Procedural controls will be put in place governing the operation and electrical alignment needed to accomplish this function.
- (4) The Unit 2 Station Blackout / Appendix R diesel generator (SBO / App R DG) is available to supply power to the Unit 2 480 V buses. The Unit 2 SBO / App R DG supplies 2,435 kW at 13.8 kV and can be started and manually load sequenced within 60 minutes. The Unit 2 SBO / App R DG can be aligned to supply power through SBO Transformer 13.8 kV – 6.9 kV to the 6.9 kV buses 5 or 6 which can be routed to any of the 480 volt buses. Procedural controls will be put in place governing the operation and electrical alignment needed to accomplish this function.

Because this request is based upon a deterministic evaluation a risk assessment that conforms to Regulatory Guide 1.200 guidelines was not performed. An estimate of the incremental risk associated with the requested additional completion time has been completed using the baseline “no maintenance” PRA model. The assessment assumed an increased potential for loss of offsite power due to a grid disturbance or plant event during the 72 hour extension of the completion time. The plant centered loss of offsite power was doubled and the need for manual restoration of power to Buses 2A and 3A (a procedurally controlled consequence of turbine trip) following a postulated plant trip was addressed. The incremental conditional core damage probability was determined to be 7.89E-8 for the additional 72 hours of completion time. The incremental conditional large early release probability was determined to be 4.76E-10 for the additional 72 hours of completion time. Compensating actions were therefore judged to be reasonable.

## **5.0 REGULATORY ANALYSIS**

### **5.1 No Significant Hazards Consideration**

Entergy Nuclear Operations, Inc. (Entergy) has evaluated the safety significance of the proposed change regarding the one time extension of the completion time for loss of an offsite power circuit according to the criteria of 10 CFR 50.92, “Issuance of Amendment”. Entergy has determined that the subject change does not involve a Significant Hazards Consideration as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No. The proposed change will revise the completion time for the loss of one offsite power source from 72 hours to 144 hours. The proposed one time extension of the completion time for the loss of one offsite power circuit does not significantly increase probability of an accident previously evaluated. The Station Auxiliary Transformer (SAT) is not the initiator of previously evaluated accidents involving a loss of offsite power. The proposed one time extension to the completion time for loss of offsite power will not significantly increase the consequences of an accident previously evaluated. The Technical Specifications continue to require equipment needed to power the 480 V buses that will power safety related equipment necessary to perform any required safety function. The one time

extension of the completion time by 72 hours does not affect the design of the SAT, the interface of the SAT with other plant systems, the operating characteristics of the SAT or the reliability of the SAT. Therefore, the proposed change does not involve a significant increase in the probability or consequences of previously evaluated accidents.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No. The proposed change will only affect the time allowed to restore the operability of the offsite power source through the SAT. The proposed changes do not affect the design, configuration or operation of the plant. There are no changes to the SAT or the supporting systems operating characteristics or conditions. Therefore, there are no potential new system interactions or failures that could create the possibility of a new or different kind of accident from any accident previously evaluated. The plant remains analyzed for a total loss of offsite power.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No. The proposed change will revise the completion time for an offsite AC power circuit but does not affect the Limiting Conditions for Operation used to establish the margin of safety. The increase in the completion time increases the period when the plant may be operating with one offsite power source. The margin of safety is maintained by maintaining the ability to safely shut the plant down and remove residual heat. Actions will be taken to perform work during periods of lower risk to grid stability and to provide assurance that required equipment is kept operable and provided with a backup onsite power source in addition to the normal sources. The proposed change does not involve a significant reduction in the margin of safety.

Based on the above, Entergy Nuclear Operations, Inc. concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92 (c), and, accordingly, a finding of "no significant hazards consideration" is justified.

## 5.2 Applicable Regulatory Requirements / Criteria

The proposed changes have been evaluated to determine whether applicable requirements continue to be met. IP2 is not a General Design Criteria (GDC) plant. Nevertheless GDC 17 was evaluated for the level of compliance and provides the overall requirements for electric power sources. The GDC requires an onsite and an offsite electric power system to permit functioning of structures, systems, and components important to safety. Each power system has to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences, and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents. The onsite electric power sources, including the batteries, and the onsite electrical distribution system, are required to have sufficient independence, redundancy, and testability to perform their safety functions, assuming a single failure. The offsite power system requires two physically independent circuits designed and located to minimize to the extent practical the likelihood of their simultaneous failure under operating and postulated accident and environmental conditions. Each of the offsite circuits must

be available in sufficient time following a loss of all onsite AC power and the other offsite electrical power circuit, to assure that specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded. One of the offsite circuits must be available within a few seconds following a-loss-of-coolant accident to assure that core cooling, containment integrity, and other vital safety functions are maintained.

The proposed change to increase the completion time does not affect IP2 compliance with this regulatory requirement. The FSAR Section 8.1.2.1 describes IP2 compliance with the GDC. The plant is supplied with normal, standby, and emergency power sources as follows:

1. The normal source of auxiliary power for 6.9-kV buses 1, 2, 3, and 4 during plant operation is the unit auxiliary transformer, which is connected to the main generator via the iso-phase bus.
2. The normal source of auxiliary power for 6.9-kV buses 5 and 6 and standby power required during plant startup, shutdown, and after reactor trip is the station auxiliary transformer, which is supplied from the Con Edison 138-kV system by either of two separate overhead lines from the Buchanan substation approximately 0.5 mile from the plant. Alternate feeds from the Buchanan 13.8-kV system are also available for immediate manual connection to the auxiliary buses.
3. Three diesel-generator sets supply emergency power to the engineered safety features buses in the event of a loss of AC auxiliary power. There are no automatic bus ties associated with these buses.
4. Power for vital instrumentation and controls and for emergency lighting is supplied from the four 125-V DC systems. The station batteries supply emergency power to the instrumentation and control systems when their associated battery chargers are not available.

The emergency diesel-generator sets are located in the Diesel Generator Building adjacent to the Primary Auxiliary Building and supply emergency power to separate 480-V switchgear buses. Each set will be started automatically on a safety injection signal or upon the occurrence of an undervoltage condition on any 480-V switchgear bus. Any two diesels have adequate capacity to supply the required engineered safety features for the design basis accident concurrent with a loss of offsite power. One diesel is adequate to provide power for a safe and orderly plant shutdown in the event of loss-of-offsite electrical power." The remainder of the discussion of compliance with the GDC is extensive and not repeated here. The change to the completion time in the TS has no effect on the manner of compliance with the GDC 17 but affects only the length of time an offsite circuit may remain inoperable.

Similarly, the extension of the completion time does not affect other regulations that are associated with electrical power (e.g., GDC 18 -Inspection and Testing of Electric Power System).

### 5.3 Environmental Considerations

The proposed change to the IP2 Technical Specifications regarding offsite power completion time does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed

amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

## **6.0 PRECEDENCE**

The proposed change is consistent with the one time completion time extension for Comanche Peak Units 1 and 2. The one time completion time extension from 72 hours to 21 days was requested in Reference 1 and granted in Reference 2.

## **7.0 REFERENCES**

1. Comanche Peak Letter to the NRC dated July 31, 2001 regarding One-Time Change to Technical Specifications Allowable Completion Time for Offsite AC Circuits (ML012180129).
2. NRC Letter to Comanche Peak dated October 9, 2001 regarding Single Occurrence Extension to Outage Time for Offsite AC Circuits (ML012840014).

ATTACHMENT 2 TO NL-06-066

**MARKUP OF TECHNICAL SPECIFICATION PAGE  
REGARDING THE ALLOWABLE COMPLETION TIME  
FOR OFFSITE AC SOURCES**

Underline for added text

~~Strikeout~~ for deleted text

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

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
	<p style="text-align: center;">-----  <b>- NOTE -</b>                      Only required if 13.8 kV offsite circuit is supplying 6.9 kV bus 5 or 6 and the Unit Auxiliary Transformer is supplying 6.9 kV bus 1, 2, 3 or 4.                      -----</p> <p>A.2      Verify automatic transfer of 6.9 kV buses 1, 2, 3, and 4 to 6.9 kV bus 5 and 6 is disabled.</p> <p><u>AND</u></p> <p>A.3      Declare required feature(s) with no offsite power automatically available inoperable when its redundant required feature(s) is inoperable.</p> <p><u>AND</u></p> <p>A.4      Restore offsite circuit to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>24 hours from discovery of no automatically available offsite power to one train concurrent with inoperability of redundant required feature(s)</p> <p>72 hours</p> <p><u>Insert 1</u></p>
<p>B. One DG inoperable.</p>	<p>B.1      Perform SR 3.8.1.1 for the offsite circuits.</p> <p><u>AND</u></p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p>

Insert 1

OR

144 hours for a one time maintenance outage on the Station Auxiliary Transformer to be completed as conditions allow in 2008.

ATTACHMENT 3 TO NL-08-094

COMMITMENTS

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

Number	Commitment
NL-08-094-01	<p data-bbox="417 348 1422 478">In order to minimize the risk associated with the extension of the completion time a number of actions will be taken and these actions will be controlled under the procedural requirements for an Infrequently Performed Test or Evolution (IPTE). The following actions will be taken:</p> <ul data-bbox="417 512 1422 1770" style="list-style-type: none"><li data-bbox="417 512 1422 743">• Equipment in the TS relied upon for postulated transients and accidents will be administratively controlled and protected to ensure the equipment remains operable and available for the duration of the planned SAT outage. This equipment includes the EDGs, the turbine driven and motor driven Auxiliary Feedwater pumps, Service water, Component cooling water, etc. Protection includes any planned activities to remove TS equipment from service for testing and / or maintenance.</li><li data-bbox="417 777 1422 940">• Procedures will be developed and issued for using the Unit 3 Appendix R diesel and the Unit 2 Appendix R / SBO diesel as backup power supplies for the Unit 2 emergency diesel generators. The feeder 13W93 with its autotransformer, the Unit 3 Appendix R diesel and the Unit 3 Appendix R / SBO diesel will be kept available as backup power supplies.</li><li data-bbox="417 974 1422 1041">• Operations will restrict plant work activities with the potential to create a plant trip. This includes hot work limitations.</li><li data-bbox="417 1075 1422 1205">• Equipment used during normal operation that is not in TS but would be useful for any transient or accident (e.g., charging pumps, primary water pumps), will be powered from buses 5A and 6A to the extent feasible. This eliminates the potential for that equipment to be stripped.</li><li data-bbox="417 1239 1422 1402">• During this extended outage time all activity in the switchyards will be closely monitored and controlled. There will be no elective switchyard work (Consolidated Edison will be contacted to assure they are not performing elective work in the switchyard) that could challenge the operability of the 13.8 kV offsite power supply.</li><li data-bbox="417 1436 1422 1503">• The Grid operator will be consulted regarding grid stability prior to removal of the SAT from service.</li><li data-bbox="417 1537 1422 1770">• The work planning will consider weather conditions. Work planning will consider the weather forecast and avoid times when there will be a strain on the grid. There will be discussions with the grid operator. Similarly, the work will not be planned during the periods when severe weather is forecast. The work is projected to be complete in less than three days but may take up to six days so the work window is well within the short term weather forecast window.</li></ul>