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**Robert Walpole**  
Licensing Manager  
Tel 914 734 6710

August 5, 2009

NL-09-107

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

**SUBJECT:** Relief Request 2-10 for Fourth Ten-Year Inservice Inspection Interval  
Indian Point Unit Number 2  
Docket No. 50-247  
License No. DPR-26

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. (Entergy) is submitting Relief Request No. 2-10 (RR-2-10) (Enclosure 1) for Indian Point Unit No. 2 (IP2). This relief request is for the Fourth 10-year Inservice Inspection (ISI) Interval.

The enclosed relief request evaluates the proposed alternative and concludes that it provides an acceptable level of quality and safety. The relief request is requested under the provisions of 10 CFR 50.55a(a)(3)(i).

Entergy requests approval of the relief request by February 25, 2010, to support the IP2 Refueling Outage (RFO) – 2R19. The relief request was discussed on June 22, 2009 with the NRC staff in order to assure the requirements were understood and that a relief request was the proper means to follow when applying the code.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "RW" followed by a stylized flourish.

RW/sp  
cc next page

A047  
NRR

Enclosure: 1. Use of ASME Section XI IWB-2412 for Reactor Pressure  
Vessel Cold Leg Nozzle Exams

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  
Mr. Paul Eddy, New York State Department of Public Service  
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA

Enclosure 1 To NL-09-107

**RELIEF REQUEST 2-10**

**USE OF ASME SECTION XI IWB-2412 FOR REACTOR PRESSURE  
VESSEL COLD LEG NOZZLE EXAMS**

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

**Indian Point Unit 2  
Fourth 10-Year ISI Interval  
Relief Request No: RR-2-10  
Revision 0  
Page 1 of 2**

**Proposed Alternative In Accordance with 10 CFR 50.55a(a)(3)(i)  
-Alternative Provides Acceptable Level of Quality and Safety-**

**1. ASME Code Component(s) Affected**

Component Number: B15.95 (Per Code Case N-722 Table 1)

Description: Reactor Vessel Cold leg nozzle-to-pipe connections (4 locations)

Code Class: 1

**2. Applicable Code Edition and Addenda**

The Code of Record for Indian Point Unit 2 Inservice Inspection Fourth Ten-Year Interval is the ASME Section XI Code, 2001 Edition, 2003 Addenda as augmented by Code Case N-722 with limitations/modifications for use stated in 10 CFR 50.55a(g)(6)(ii)(E).

**3. Applicable Code Requirement**

Footnote 1 in 10CFR50.55a states in part:

*".....For inspections to be conducted once per interval, the inspections shall begin in the interval in effect on January 1, 2009, and shall be prorated over the remaining periods and refueling outages in this interval."*

**4. Reason for Request**

ASME Code Case N-722 requires that all four cold leg nozzles be visually inspected once during each of the 10 year ISI intervals. 10CFR50.55a imposed this Code Case as a regulatory requirement effective January 1, 2009. The Code Case (through IWB-2412 of ASME Section XI) requires that at least 25% of the inspections be completed during each of the remaining 3 1/3 year periods in the current 10 year interval but it does not require that any inspections be completed during the first period of the fourth interval when the requirement was added. Footnote 1 in 10CFR50.55a states that the inspections shall begin in the interval in effect on January 1, 2009 and shall be prorated over the remaining periods and refueling outages. The requirements in the Footnote 1 are more restrictive than the requirements of the Code Case and would require, if relief is not granted, a visual inspection of one Cold Leg RV nozzle during the upcoming 2R19 refuel outage scheduled for March 2010. Since there is insufficient time to properly plan these inspections prior to the next refueling outage, these inspections would result in additional personnel exposure without a corresponding increase in plant safety.

## **5. Proposed Alternative and Basis For Use**

This relief requests approval of the scheduling methodology provided in Code Case N-722 in lieu of the scheduling requirements provided in Foot Note 1 in 10CFR50.55a. The scheduling of visual examinations under Code Case N-722 is specified in Note 6 to Table 1, which states:

*"VE shall be performed in accordance with the schedule in IWB-2400."*

Paragraph IWB-2412(b) provides the following specific guidance regarding the scheduling of examinations that are added during the first 3 1/3 year period of the current 10 year Inspection Program interval:

*"When items or welds are added during the first period of an interval, at least 25% of the examinations required by the applicable Examination Category and Item Number for the added items or welds shall be performed during each of the second and third periods of that interval."*

Use of ASME Section XI Code, 2001 Edition, 2003 Addenda Paragraph IWB-2412(b) scheduling rules provide an acceptable level of quality and safety because they are already approved for use by 10CFR50.55a(b)(2) and provide for scheduling examinations to coincide with modification work that can improve ALARA performance for the site.

## **6. Duration of Proposed Alternative**

Relief is requested for the fourth ten-year interval of the Inservice Inspection Program for Indian Point Unit 2, which began March 1, 2007 and concludes April 3, 2016.

## **7. Precedents**

None.