

RHS E-302

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C O U N S E L O R S A T L A W

DOCKETED
USNRC

November 18, 2009 (8:30am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

November 19, 2009

Lawrence G. McDade, Chairman
Dr. Richard E. Wardwell
Dr. Kaye D. Lathrop
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket: *Entergy Nuclear Operations, Inc. (Indian Point Nuclear Generating Units 2 and 3), Docket Nos. 50-247-LR and 50-286-LR*

RE: Notification of Entergy's Commitment to Re-Analyze the SAMAs for Indian Point Units 2 and 3

Dear Administrative Judges:

Entergy Nuclear Operations, Inc. ("Entergy") is providing this notice to the Atomic Safety and Licensing Board ("Board") regarding a discrepancy found recently with the wind direction inputs to the MACCS2 code for the Indian Point Energy Center ("IPEC") severe accident mitigation alternative ("SAMA") analysis. As documented in the attached November 16, 2009 letter to the U.S. Nuclear Regulatory Commission ("NRC"), Entergy found this discrepancy during investigations to resolve a question from the NRC staff regarding wind directions. Specifically, the method used to obtain the five-year average hourly wind directions used in the MACCS2 code inputs has been determined to be faulty. As further noted in the letter, Entergy will correct the wind direction inputs, re-analyze the SAMAs for both IPEC units, and provide the results to the NRC by December 16, 2009.

Entergy is providing this notice to the Board and the parties because the revised SAMA analysis may be relevant and material to admitted contentions NYS-12/12A and NYS-16/16A. Although contentions NYS-12/12A and NYS-16/16A do not concern the adequacy of the wind direction inputs, the revised estimates of offsite population dose and offsite economic costs, and

TEMPLATE = SECY-043

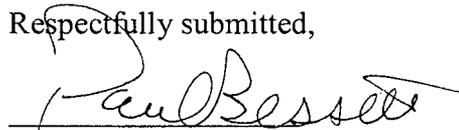
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Lawrence G. McDade, Chairman
Dr. Richard E. Wardwell
Dr. Kaye D. Lathrop
November 17, 2009
Page 2

Morgan Lewis
COUNSELORS AT LAW

the revised SAMA analysis results, may have some bearing on the adjudication of these contentions.

Respectfully submitted,



Kathryn M. Sutton, Esq.
Paul M. Bessette, Esq.

Counsel for Entergy Nuclear Operations, Inc.

JMR/als
Attachment
cc: Service List



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Fred Dacimo
Vice President
License Renewal

NL-09-151

November 16, 2009

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

SUBJECT: Entergy Nuclear Operations Inc.
Telephone Conference Call Regarding
Met Tower Data for SAMA Analysis
Indian Point Nuclear Generating Unit Nos. 2 & 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

REFERENCE: 1. Meeting Minutes, Telephone Conference, November 9, 2009,
between Ms. Kimberly Green NRC and Entergy Staff Regarding Met
Tower Data for SAMA Analyses

Dear Sir or Madam:

Entergy Nuclear Operations, Inc is providing this letter to document a discrepancy found with the wind direction inputs to the MACCS2 code for the IPEC SAMA analysis. Entergy found the discrepancy during investigations to resolve a question from the NRC staff regarding wind directions. The method used to obtain the five-year average hourly wind directions has been determined faulty. This issue has been entered into Entergy Corrective Action Program as CR-HQN-2009-01044. IPEC will correct the wind direction inputs, re-analyze the SAMAs for both units and provide the results to the NRC by December 16, 2009.

As requested during the telephone conference summarized in reference 1, Entergy will provide the following information on or before December 16, 2009.

- The meteorological data and justification supporting its use in the SAMA analysis (e.g., if a single year is used or an average of several years),
- Revised estimates of the offsite population dose and offsite economic costs,
- Identification of the meteorological tower elevation from which meteorological data were obtained and the rationale for selecting the data from that tower elevation,
- Revised SAMA analysis results, specifically for the analysis case discussed in response to RAI 4e, dated February 5, 2008, and
- The complete MACCS2 input file used for the reanalysis (in electronic format).

If you have any questions, or require additional information, please contact Mr. Robert Walpole at 914-734-6710.

Sincerely,

A handwritten signature in black ink, appearing to be 'RW', written over a horizontal line.

FRD/dmt

Attachment: 1. Regulatory Commitment

cc: Mr. Samuel J. Collins, Regional Administrator, NRC Region I
Mr. Sherwin E. Turk, NRC Office of General Counsel, Special Counsel
Ms. Kimberly Green, NRC Safety Project Manager
Mr. John Boska, NRR Senior Project Manager
IPEC NRC Resident Inspector's Office
Mr. Paul Eddy, New York State Department of Public Service
Mr. Francis J. Murray, President and CEO, NYSERDA

ATTACHMENT 1 TO NL-09-151

Regulatory Commitment

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 & 3
DOCKET NOS. 50-247 AND 50-286
LICENSE NOS. DPR-26 AND DPR-64

Regulatory Commitment

The following table identifies an action committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE	RELATED LRA SECTION / AUDIT ITEM
1	<p>Entergy will provide the following information on or before December 16, 2009.</p> <ul style="list-style-type: none"> • The meteorological data and justification supporting its use in the SAMA analysis (e.g., if a single year is used or an average of several years), • Revised estimates of the offsite population dose and offsite economic costs, • Identification of the meteorological tower elevation from which meteorological data were obtained and the rationale for selecting the data from that tower elevation, • Revised SAMA analysis results, specifically for the analysis case discussed in response to RAI 4e, dated February 5, 2008, and • The complete MACCS2 input file used for the reanalysis (in electronic format). 	<p>IP2: December 16, 2009</p> <p>IP3: December 16, 2009</p>	NL-09-151	Appendix E Section 4.21

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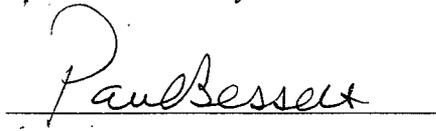
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* Original and 2 copies provided to the Office of the Secretary.

A handwritten signature in cursive script, reading "Paul Bessette", is written above a horizontal line.

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DB1/63994238.1