



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

April 12, 2010

Mr. Paul Blanch
[HOME ADDRESS DELETED]
UNDER 10 CFR 2.390(a)]

Dear Mr. Blanch:

This letter is in response to your E-mail message dated March 4, 2010 to Mel Gray, of my staff, in which you raised a concern regarding the external hazard posed by the natural gas pipelines that traverse the owner-controlled area at the Indian Point site; and stated your belief that the potential for an explosion involving these pipelines is an "unanalyzed condition" for the Indian Point facility.

The two gas pipelines traverse the owner controlled area and are physically located closer to Indian Point Unit 3 (IP3) than Indian Point Unit 2 (IP2). The initial licensee and the Atomic Energy Commission (AEC), predecessor to the Nuclear Regulatory Commission (NRC), considered the hazards posed by these pipelines during the initial licensing process of IP3, and determined that the presence of the gas pipelines did not endanger the safe operation of IP3. The licensing documentation for IP3 provides information to address your questions. In this regard, you may wish to review (a) item 7, "Gas Pipeline Fire," in the Preliminary Safety Analysis Report (PSAR) for IP3, filed by Consolidated Edison Co. of New York, dated August 30, 1968, which can be accessed from the NRC's Agencywide Documents Access and Management System (ADAMS), using Accession No. ML093480204. This document describes the design and construction of the gas lines, operation and maintenance practices, postulated failure modes, and standoff distances provided to determine safety-related structures would not be affected. The AEC's safety evaluation report (SER) for IP3, Section 2.2, describes the staff's conclusions regarding this analysis that the failure of these gas pipelines would not impair the safe operation of IP3. The SER is dated September 21, 1973, and can be accessed in ADAMS using Accession No. ML072260465.

In addition, approximately two years ago, the NRC staff requested that the licensee perform a further evaluation of the hazard posed by the gas pipelines. In response, in August 2008, the licensee completed a further evaluation of the consequences of a failure of the gas pipelines, including the simultaneous failure of both pipelines with rupture and explosion or fire. In that analysis, submitted to the NRC in September 2008, the licensee concluded that the pipelines do not pose a safety or security hazard to the Indian Point facility. This evaluation is not available to the public, as it contains security-related information. The NRC staff reviewed the licensee's evaluation, and concluded that the presence of the gas pipelines at the Indian Point site does not endanger the safe or secure operation of the facility.

The NRC staff has reviewed your E-mail message, and has determined that it does not provide material new information which was not considered previously. However, in our review of this issue the staff identified a discrepancy in the Indian Point Environmental Report ((ER) for license renewal submitted to the NRC by letter dated April 23, 2007 (Accession No. ML071210530). In the ER, at page 8-9, the licensee stated that three gas lines traverse the Indian Point owner controlled area. In contrast, the licensee's 2008 external hazard analysis indicates there are two gas pipelines that traverse the site. These pipelines interconnect with a third gas pipeline, which is used for maintenance purposes, near property boundary. The staff has determined that consistent with the hazard analysis, two gas pipelines traverse the site and interconnect with a third gas pipeline, which is used for maintenance purposes, near the property boundary. This third pipeline was incorrectly identified as traversing the site in the licensee's ER for license renewal. The licensee has placed this issue in its corrective action program and plans to revise its submittal to the NRC. This error does not impact the conclusions reached by the staff in the NRC's draft environmental impact statement for license renewal. Accordingly, no further action is necessary at this time with respect to the matters you have raised.

We appreciate your questions and your expression of your views. We trust the referenced information addresses the safety concerns that you referenced in your email dated March 4, 2010. If you have further concerns or new information regarding these gas pipelines, please contact Richard Barkley at (610) 337-5065.

Sincerely,



David C. Lew, Director
Division of Reactor Projects
Region I

cc: N. Salgado
D. Wrona
D. Huyck
S. Turk
M. Gray
D. Lew

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Sincerely,

/RA/

David C. Lew, Director
Division of Reactor Projects
Region I

cc: N. Salgado
D. Wrona
D. Huyck
S. Turk
M. Gray
D. Lew

SUNSI Review Complete: MG (Reviewer's Initials)

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