



Entergy Nuclear Northeast
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249
Tel 914 734 6700

Robert Walpole
Licensing Manager
Tel (914) 734-6710

June 3, 2010

NL-10-059

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

SUBJECT: Relief Request IP2-ISI-RR-11 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 IP2-ISI-RR-11 (Enclosure 1) for Indian Point Unit No. 2 (IP2) for the Fourth 10-year Inservice Inspection (ISI) Interval.

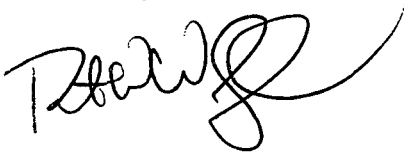
The enclosed relief request evaluates the proposed alternative and concludes that it provides an acceptable level of quality and safety. The relief request is requested under the provisions of 10CFR 50.55a(a)(3)(i). Entergy requests to utilize the alternative qualification requirements of the American Society of Mechanical Engineers and Pressure Vessel Code (ASME Code) Case N-739-1, "Alternative Qualification Requirements for Personnel Performing Class CC Concrete and Post-Tensioning System Visual Examinations" in lieu of the requirements in the ASME Code Section XI, Article IWA-2300, "Qualification of Nondestructive Examination Personnel," for personnel performing visual examinations of ASME Code Class CC concrete surfaces for this interval.

Entergy requests approval of the relief request within 12 months of docketing which will allow time for implementation during the next refuel outage.

AO47
NLR

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'RW', with a long, sweeping flourish extending to the right.

RW/sp

Enclosure 1. Relief Request No: IP2-ISI-RR-11, Proposed Alternative to Use ASME
Code Case N-739-1

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Samuel J. Collins, Regional Administrator, NRC Region 1
NRC Resident Inspector, IP2
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA
Mr. Paul Eddy, New York State Dept. of Public Service

Enclosure 1 TO NL-10-059

RELIEF REQUEST NO: IP2-ISI-RR-11

PROPOSED ALTERNATIVE TO USE ASME CODE CASE N-739-1

**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: IP2-ISI-RR-11
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

Code Class: CC
References: ASME Section XI, 2001 Edition with 2003 Addenda, Article IWA-2300
and Subsection IWL-2310
Code Case N-739-1
Examination Category: L-A
Item Number: L1.11, L1.12
Description: Request to Utilize the Alternative Requirements of Code Case N-739-1: Alternative Qualification Requirements for Personnel Performing Class CC Concrete and Post-Tensioning System Visual Examinations

2. Applicable Code Edition and Addenda

The Code of Record for the Indian Point Unit 2 Inservice Inspection Fourth Interval is the ASME Section XI Code, 2001 Edition including the 2003 Addenda.

3. Applicable Code Requirement

IWA-2300 provides requirements for qualification of nondestructive examination personnel.

IWL-2310 provides requirements for the qualification of personnel performing Class CC Concrete and Post-Tensioning System Visual Examinations.

Per 10 CFR 50.55a(b)(2)(viii)(F), personnel that examine containment concrete surfaces and tendon hardware, wires, or strands must meet the qualification provisions in IWA-2300. The "owner-defined" personnel qualification provisions in IWL-2310(d) are not approved for use.

4. Reason for Request

Pursuant to 10 CFR 50.55a(a)(3)(i), authorization is requested on the basis that the proposed alternative, use of Code Case N-739-1, would provide an acceptable level of quality and safety.

5. Proposed Alternative and Basis for Use

Pursuant to 10 CFR 50.55a(a)(3)(i), Entergy requests authorization to utilize the alternative requirements in ASME Code Case N-739-1 in lieu of the requirements of IWA-2300.

Basis for Use

The reason the NRC has included the modification in 10 CFR 50.55a(b)(2)(viii)(F), that prohibits licensees to utilize the "owner-defined" personnel qualification provisions in IWL-2310 is that they believe it is inappropriate to approve Code provisions that do not contain specific containment inspection guidance when prior experience demonstrates that specific containment inspection guidance is necessary. In lieu of the IWL-2310 personnel qualification requirements, the 10 CFR 50.55a(b)(2)(viii)(F) modification requires that licensees implement the IWA-2300 personnel qualification provisions.

In response to this NRC concern, ASME has developed an alternative set of qualification requirements in Code Case N-739-1. This Code Case provides detailed criteria to qualify personnel who examine containment concrete surfaces and tendon hardware, wires, or strands.

Similar to the requirements in IWA-2300, Code Case N-739-1 includes plant and Section XI Subsection IWL experience requirements as well as detailed training proficiency requirements for personnel performing Class CC concrete and post-tensioning system visual examinations.

Entergy believes that the alternative requirements in Code Case N-739-1 satisfy the NRC's concern of licensees utilizing Code requirements that do not contain specific containment inspection guidance. In addition, Entergy believes that the alternative requirements in Code Case N-739-1 provide an acceptable level of quality and safety to the requirements in IWA-2300.

6. Duration of Proposed Alternative

Relief is requested for the Fourth Ten Year Interval (effective from March 2007 thru May 2016).

7. Precedents

This request is essentially identical to the previous Entergy Northeast Indian Point Nuclear Generating Unit No. 3 - Relief Request RR-03 which was approved in NRC letter dated April 12, 2010, TAC No. ME1577.

8. References

None