

**From:** Boska, John  
**Sent:** Wednesday, September 14, 2011 10:48 AM  
**To:** 'Prussman, Stephen G'  
**Subject:** NRC Request for Additional Information on Indian Point 2 Relief Request RR-14, ME6801

By letter dated August 3, 2011 (Agencywide Documents Access & Management System (ADAMS) at ML11224A026), Entergy Nuclear Operations, Inc., (the licensee), proposed an alternative to 10 CFR 50.55a(g)(6)(ii)(F) for Indian Point Nuclear Generating Unit No. 2 (IP2). The requirement, for which relief is requested defines the inservice volumetric inspection frequency of the reactor vessel cold leg nozzle to safe end welds in accordance with American Society of Mechanical Engineer's (ASME) Boiler and Pressure Vessel Code (Code) Case N-770-1, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated With UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities, Section XI, Division 1," with NRC conditions. The request for relief applies to the fourth 10-year inservice inspection (ISI) interval in which the licensee adopted the 2001 Edition through the 2003 Addenda of ASME Code Section XI, as the Code of Record.

In accordance with Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(a)(3)(i), the licensee has submitted the subject relief request for IP2 in which the licensee proposes to defer volumetric inspections of the reactor vessel cold leg nozzles from March 2012 to March 2014.

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IP2 operating license currently expires on September 28, 2013, but an application for license renewal was submitted to the NRC on April 30, 2007 (ADAMS at ML071210507). Under the provisions of 10 CFR 2.109(b), if the licensee of a nuclear power plant licensed under 10 CFR 50.21(b) or 50.22 files a sufficient application for renewal of either an operating license or combined license at least 5 years before the expiration of the existing license, the existing license will not be deemed to have expired until the application has been finally determined. Hence, the existing license for IP2 will not be deemed to expire in 2013 unless the NRC's review of the IP2 license renewal application has been completed.

The NRC has reviewed the information submitted by the licensee and has determined the following additional information is needed to complete the evaluation. The question is found below. On September 13, 2011, the Entergy staff indicated that a response to the request for additional information would be provided by November 14, 2011, or an extension would be requested.

1. A flaw analysis calculation of hypothetical flaws that grow axially and circumferentially through the period of reinspection frequency is needed to allow the NRC staff to fully evaluate the request. Initial hypothetical flaw size should be based on a conservative assessment of the effectiveness of previous examination techniques including the probability of detection for the inspection methods. Justification of the initial hypothetical flaw size is necessary for the staff to assess the results of the analysis. Comparison of final flaw size to allowable flaw size is also requested. Allowable flaw size is governed by Section XI of the ASME Code. The staff recognizes that additional guidance for input parameters and attributes for an acceptable residual stress analysis are provided in the Materials Reliability Program Report, "Primary Water Stress Corrosion Cracking (PWSCC) Flaw Evaluation Guidance (MRP 287)."

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