

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

Joseph Pollock Site Vice President Administration

NL-11-131

December 14, 2011

U.S. Nuclear Regulatory Commission Attn: Document Control Desk 11555 Rockville Pike Rockville, MD. 20852

SUBJECT: Response to Request For Additional Information Regarding Response to NRC Bulletin 2011-01, Mitigating Strategies (TAC Nos. ME6441 and ME6442) Indian Point Unit Numbers 2 and 3 Docket Nos. 50-247 and 50-286 License Nos. DPR-26 and DPR-64

REFERENCES: 1. NRC Letter to Entergy Regarding Request for Additional Information – 60-Day Response to Bulletin 2011-01, "Mitigating Strategies" (TAC Nos. ME6441 and ME6442)

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2. Entergy Letter (NL-11-076) to NRC regarding 60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies dated July 8, 2011

Dear Sir or Madam:

The Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011 (ML111250360), to request each licensee to provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2). The NRC requested additional information (Reference 1) regarding the Entergy Nuclear Operations, Inc. response (Reference 2). The response to that request is in Attachment 1.

There are no new commitments contained in this submittal. If you need any additional information, please contact Mr. Robert Walpole, Licensing Manager, at (914) 254-6710.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on December $\underline{14}$, 2011.

Sincerely,

JP/sp

Attachment: Response to RAI on 60-Day Response to NRC Bulletin 2011-01

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL Mr. William M. Dean, Regional Administrator, NRC Region 1 NRC Senior Resident Inspectors Mr. Paul Eddy, New York State Dept. of Public Service

ATTACHMENT 1 to NL-11-131

RESPONSE TO RAI ON 60-DAY RESPONSE TO

NRC BULLETIN 2011-01

ENTERGY NUCLEAR OPERATIONS, INC. INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 and 3 DOCKET NOS. 50-247 and 50-286

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Indian Point Units No 2 and 3

On May 11, 2011, the NRC issued Bulletin 2011-01 'Mitigating Strategies'. On November 15, 2011 the NRC requested additional information regarding the Entergy 60 day response to that Bulletin. The following are the questions and responses.

Question 1

Describe in detail how you ensure that a vehicle is available to move the B.5.b portable pump and other B.5.b equipment to the appropriate place when needed.

The bulletin requested that each licensee describe in detail the controls for ensuring equipment needed to execute the mitigating strategies will be available when needed. A vehicle is typically needed to implement the strategies since the portable pump and other equipment is stored away from target areas. The NRC staff could not determine if you performed activities to ensure that a tow vehicle would be available when needed.

Response

The B.5.b trailer contains the pump (on a trailer), hose and hardware for Unit 3 Fuel pool spray and / or injection. The trailer and equipment are manually moved by operators to allow placement of nozzles and hoses for the spent fuel scenarios. Other identified uses of the pump are not timed events and the trailer can be moved into place without a vehicle, although this is not verified by performance nor is it intended to be. Because of this, a vehicle is not required to move the B.5.b pump. However, there are a number of vehicles normally on site with a 2 inch trailer ball that could be used for moving the pump or equipment if desired.

The ability to manually implement the SFP scenario was demonstrated on August 27, 2008 in a timed drill scenario with the stated objectives of positioning the required equipment in position without a truck within 2 hours. The objectives were successfully met.

Question 2

Clarify the frequency of training provided to your fire brigade.

In response to Question 4 of the bulletin, you describe annual training that is provided to the fire brigade. However, the "annual" training is listed as occurring every "3 years".

Response

The description of the training said "Annual training on scenarios and strategies as part of fire brigade training as well as operations training." The periodicity was given as three years. The fire brigade, consisting of non-licensed operators and fire brigade leaders, is given a brief overview of B5b strategies, equipment and equipment locations during the annual fire brigade training. The Licensed Operators are given continuing training every 2 years and the non Licensed Operators are given continuing training every 3 years. Since these operators also make up the fire brigade, they receive training at least once every 3 years.