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**John A. Ventosa**  
Site Vice President  
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NL-12-093

July 11, 2012

Mr. William M. Dean  
Regional Administrator  
USNRC Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

Subject: Revision to Response to Request for Additional Information Regarding  
Operator Manual Actions  
Indian Point Nuclear Generating Unit 2  
Docket No. 50-247  
License No. DPR-26

- References:
1. NRC letter dated February 1, 2012, "Indian Point Nuclear Generating Unit No.2 – Exemption from the Requirements of 10 CFR Part 50, Appendix R, Paragraph III.G.2 (TAC No. ME0798)
  2. NRC letter dated February 1, 2012, "Indian Point Energy Center Units 2 & 3-Request for Additional Information Regarding Operator Manual Actions"
  3. Entergy letter NL-12-041 dated March 1, 2012, "Response to Request for Additional Information Regarding Operator Manual Actions"

Dear Sir:

By letter dated February 1, 2012 (Reference 1), exemptions from the requirements of 10 CFR 50, Appendix R, Paragraph III.G.2 for the use of operator manual actions (OMAs) were granted in part and denied in part for Indian Point Unit 2. A request for additional information regarding the plans by Entergy Nuclear Operations, Inc. (Entergy) for achieving compliance with fire protection regulations in light of the denied exemptions was also transmitted by letter dated February 1, 2012 (Reference 2). Entergy's response to Reference 2 was provided in Reference 3. Entergy committed to inform the NRC in Reference 3 of any changes in resolution concept and/or completion schedule that may be determined to be necessary as an outcome of the engineering analysis and evaluation process. Accordingly, the attachment to this letter provides a revision to the response for Unit 2, and contains Entergy's current and planned actions and the

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schedule for completion of corrective actions that will resolve each of the identified OMA concerns, and thereby establish full compliance with the requirements of the applicable subsection of 10 CFR 50, Appendix R, Section III.G.

The attachment presents a listing of the Unit 2 OMAs that were denied. The table in the attachment presents the OMAs sorted by the fire zone(s) of concern, i.e., those fire zones for which use of the discrete OMAs had been requested, and they include a description of the planned resolution and scheduled completion date for each of the OMAs. It has been determined that a plant modification will be required to eliminate OMA 6 in Fire Area/Zone F/7A and Fire Area/Zone F/27A rather than a revision to the safe-shutdown analysis and methodology to credit an equipment train independent of these zones. Also, the two OMAs that were inadvertently omitted from the exemption request process were added to Fire Area/Zone F/7A as OMAs 20 and 21, and these will be eliminated by another plant modification. The footnote in the table, the note for OMA 19 in Fire Area/Zone K/60A, and the note on page 4 were also revised. These changes to the attachment are identified by revision bars. There are no other changes to the information provided in Reference 3.

As noted in Reference 3, given the substantial technical challenge imposed by the OMA resolution effort, and recognizing that the requisite engineering evaluations are in progress at this time, the presently conceptualized solutions may change, in that the scope of analyses and/or the nature and scope of plant physical modifications may require revision as the OMA resolutions are finalized. The target completion dates shown in the attachment represent Entergy's current informed projection, and any change in resolution concept and/or completion schedule that may be determined to be necessary as an outcome of the engineering analysis and evaluation process will be promptly communicated to NRC, as previously committed to in Reference 3. There are no new regulatory commitments made in this submittal.

In the event of any questions, please contact Mr. Robert W. Walpole, Manager, Licensing at 914-254-6710.

Sincerely,

*Robert W. Conway for John A. Ventosa*

JAV/gd

Attachment: Resolution of Indian Point Unit 2 III.G.2 OMAs For Which Exemptions Have Been Denied (Revised from Letter NL-12-041 dated March 1, 2012)

cc: Mr. Douglas V. Pickett, Senior Project Manager, NRC NRR DORL  
U.S. Nuclear Regulatory Commission Document Control Desk  
NRC Resident Inspectors  
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA  
Ms. Bridget Frymire, New York State Department of Public Service

Attachment  
to  
NL-12-093

Resolution of Indian Point Unit 2  
III.G.2 OMAs For Which Exemptions Have Been Denied  
(Revised from Letter NL-12-041 dated March 1, 2012)

ENTERGY NUCLEAR OPERATIONS, INC.  
Indian Point Nuclear Generating Unit No. 2  
Docket No. 50-247  
License No. DPR-26

<b>RESOLUTION OF INDIAN POINT UNIT 2</b>			
<b>III.G.2 OMAS FOR WHICH EXEMPTIONS HAVE BEEN DENIED</b>			
<b>Fire Area / Zone</b>	<b>OMA No.<sup>1</sup></b>	<b>Planned Resolution</b>	<b>Scheduled Completion Date</b>
F/5A	6	Revise Appendix R safe-shutdown analysis and methodology to credit equipment train independent of the fire area/zone, thereby eliminating this OMA	Q3 2012
F/6	6	As described for OMA 6, Fire Area F, Fire Zone 5A	Q3 2012
	7	Revise Appendix R safe-shutdown analysis and methodology to credit equipment train independent of the fire area/zone, thereby eliminating this OMA	Q4 2012
F/7A	6	Implement modification to protect circuits of concern, thereby eliminating this OMA	Spring 2014 RFO
	7	As described for OMA 7, Fire Area F, Fire Zone 6	Q4 2012
	20	Implement modification to protect circuits of concern, thereby eliminating this OMA (see Note on page 4)	Spring 2014 RFO
	21	Implement modification to protect circuits of concern, thereby eliminating this OMA (see Note on page 4)	Spring 2014 RFO
F/22A	6	As described for OMA 6, Fire Area F, Fire Zone 5A	Q3 2012
F/27A	5	Revise Appendix R safe-shutdown analysis and methodology to credit equipment train independent of the fire area/zone, thereby eliminating this OMA	Q3 2012
	6	As described for OMA 6, Fire Area F, Fire Zone 7A	Spring 2014 RFO
F/33A	5	As described for OMA 5, Fire Area F, Fire Zone 27A	Q3 2012
F/59A	5	As described for OMA 5, Fire Area F, Fire Zone 27A	Q3 2012
H/72A	8	Revise Appendix R safe-shutdown analysis and methodology to credit equipment train independent of the fire area/zone, thereby eliminating this OMA	Q3 2012
H/75A	8	Revise Appendix R safe-shutdown analysis and methodology to credit a train of equipment free of fire damage in the fire area/zone, thereby eliminating this OMA	Q3 2012
	9,10	Implement modification to protect circuits of concern, thereby eliminating these OMAS	Spring 2014 RFO

<sup>1</sup> As identified in table on pages 5 and 6 in Exemption transmitted by Reference 1, with the exception of OMAS 19, 20 and 21 – see Note on page 4

<b>RESOLUTION OF INDIAN POINT UNIT 2</b>			
<b>III.G.2 OMAs FOR WHICH EXEMPTIONS HAVE BEEN DENIED</b>			
<b>Fire Area / Zone</b>	<b>OMA No.<sup>1</sup></b>	<b>Planned Resolution</b>	<b>Scheduled Completion Date</b>
H/77A	8	As described for OMA 8, Fire Area H, Fire Zone 72A	Q3 2012
	9,10	As described for OMAs 9,10, Fire Area H, Fire Zone 75A	Spring 2014 RFO
H/84A	8	As described for OMA 8, Fire Area H, Fire Zone 72A	Q3 2012
H/85A	8	As described for OMA 8, Fire Area H, Fire Zone 72A	Q3 2012
H/87A	8	As described for OMA 8, Fire Area H, Fire Zone 72A	Q3 2012
	9,10	As described for OMAs 9,10, Fire Area H, Fire Zone 75A	Spring 2014 RFO
J/19	11	Reassess electrical circuit and power supply loading analyses and revise Appendix R safe-shutdown analysis and methodology to provide the basis for elimination of this OMA	Q3 2012
J/25	12	Revise Appendix R safe-shutdown analysis and methodology to credit equipment train independent of the fire area/zone, thereby eliminating this OMA	Q4 2012
J/39A	11	As described for OMA 11, Fire Area J, Fire Zone 19	Q3 2012
	12	As described for OMA 12, Fire Area J, Fire Zone 25	Q4 2012
J/43A	11	As described for OMA 11, Fire Area J, Fire Zone 19	Q3 2012
	12	As described for OMA 12, Fire Area J, Fire Zone 25	Q4 2012
	13	Revise Appendix R safe-shutdown analysis and methodology to credit equipment train independent of the fire area/zone, thereby eliminating this OMA	Q3 2012
J/45A	11	As described for OMA 11, Fire Area J, Fire Zone 19	Q3 2012
J/46A	11	As described for OMA 11, Fire Area J, Fire Zone 19	Q3 2012
	12	As described for OMA 12, Fire Area J, Fire Zone 25	Q4 2012
	13	As described for OMA 13, Fire Area J, Fire Zone 43A	Q4 2012
J/47A	11	As described for OMA 11, Fire Area J, Fire Zone 19	Q3 2012
J/50A	11	As described for OMA 11, Fire Area J, Fire Zone 19	Q3 2012
	12	As described for OMA 12, Fire Area J, Fire Zone 25	Q4 2012
J/270	12	As described for OMA 12, Fire Area J, Fire Zone 25	Q4 2012

RESOLUTION OF INDIAN POINT UNIT 2 III.G.2 OMAS FOR WHICH EXEMPTIONS HAVE BEEN DENIED			
Fire Area / Zone	OMA No. <sup>1</sup>	Planned Resolution	Scheduled Completion Date
K/60A	14	Implement modification to protect circuits of concern, thereby eliminating this OMA	Q4 2012
	15	Implement modification to protect circuits of concern, thereby eliminating this OMA	Q4 2012
	19	Implement modification to protect circuits of concern, thereby eliminating this OMA (see Note on page 4)	Q4 2012
K/65A	14	As described for OMA 14, Fire Area K, Fire Zone 60A	Q4 2012
	15	As described for OMA 15, Fire Area K, Fire Zone 60A	Q4 2012
	19	As described for OMA 19, Fire Area K, Fire Zone 60A	Q4 2012

### Description of Unit 2 Denied OMAs

5. Open HCV-142 bypass valve 227 to align charging pump makeup path to the Reactor Coolant System (RCS)
6. Align charging pump suction source to the Refueling Water Storage Tank (RWST)
7. Transfer instrument buses 23 and 23A to alternate power
8. Fail open valves 204A (charging flow to Loop 2 hot leg) and 204B (charging flow to Loop 1 cold leg) to align charging pump makeup path to the RCS
9. Activate or enable Alternate Safe Shutdown System pneumatic instruments (steam generator level, pressurizer pressure and level) at Fan House local control panel
10. Enable Alternate Safe-Shutdown System source-range channel and Loop 21 and 22 hot leg ( $T_h$ ) and cold leg ( $T_c$ ) temperature channels
11. Trip breakers 52/5A and 52-SAC on Bus 5A and 52/6A and 52/TAO at Bus 6A and remove control power fuses
12. Transfer Instrument Buses 23 and 23A to emergency power source
13. Align charging pump suction to RWST
14. Operate transfer switch EDC5 and close supply breaker at substation 12FD3 to transfer 21 AFW Pump to Alternate Safe Shutdown System power source
15. Open 21 AFW Pump recirculation bypass valve BFD-77
19. Operate 21 AFW Pump flow control valves to control AFW flow to Steam Generators 21 & 22
20. Locally operate 21 Charging Pump scoop tube positioner
21. Locally start 21 Charging Pump using the emergency control station located in the 480V Switchgear Room

NOTE: With the exception of OMAs 19, 20 and 21, the descriptions are copied from the table on pages 5 and 6 in Exemption transmitted by Reference 1. OMA 19 was not addressed in the Exemption transmitted by Reference 1. OMAs 20 and 21 were inadvertently omitted from the exemption request process, and are therefore unapproved OMAs. The three OMAs have been given the next sequential numbers.