IPRenewal NPEmails

From: Waters, Roger M. [rwater1@entergy.com]
Sent: Thursday, October 18, 2012 7:00 PM
To: Wentzel, Michael
Cc: Daily, John; Pickett, Douglas
Subject: IPEC License Renewal - Clarification of Underground Piping Information
Attachments: NL-12-149.pdf

Mike,

Attached is a pdf version of the subject submittal. The hardcopies will be sent out shortly.

Roger Waters
IPEC Licensing
914-254-7714

Hearing Identifier: IndianPointUnits2and3NonPublic_EX
Email Number: 3878

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From: Waters, Roger M.

Created By: rwater1@entergy.com

Recipients:
"Daily, John" <John.Daily@nrc.gov>
Tracking Status: None
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Fred Dacimo
Vice President
Operations License Renewal

NL-12-149
October 18, 2012

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

SUBJECT: Clarification of Underground Piping Information Provided in Letter NL-11-032 Regarding the License Renewal Application
Indian Point Nuclear Generating Unit Nos. 2 & 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

REFERENCE: (1) Entergy letter (NL-11-032), "Response to Request for Additional Information (RAI) Aging Management Programs," dated March 28, 2011

Dear Sir or Madam:

Reference (1) stated in the response to RAI 3.0.3.1.2-1 Part 5a that "Underground piping and tanks are below grade, but are contained within a tunnel or vault such that they are in contact with air and are located where access for inspection is restricted. In-scope SSCs that are subject to aging management review at IPEC include no underground piping or tanks." Indian Point made this statement because piping located in underground vaults is periodically accessed for visual inspections during pressure tests. However, during a recent review of the NRC Interim Staff Guidance (ISG) for Buried Piping, LR-ISG-2011-03, a question was raised relative to the definition of "restricted" and whether the Indian Point definition was consistent with the intent of the ISG. As a result of this question, Entergy Nuclear Operations, Inc held a conference call with the NRC staff to clarify the definition of "restricted" as used in the ISG. Although definition of the term "restricted" as related to underground piping was not found in NRC guidance documents related to license renewal, during the conference call on October 11, 2012, the NRC Staff indicated that it was intended that piping located in vaults for which access requires more than simply opening a locked access cover should be classified as underground piping.

As a result of this change in understanding of the definition of underground piping, Indian Point has identified portions of the service water, city water and fuel oil systems that are located in vaults that require more than unlocking a hatch or cover for access. This piping will now be considered underground piping as defined in LR-ISG-2011-03. Specifically, this includes

portions of two 24" diameter Indian Point 3 service water inlet headers (approximate total length of 70 feet) that run over the discharge canal, portions of the Indian Point 2 and 3 fuel oil piping (1 ½", 3" and 4" in diameter) that supply and run between the fuel oil storage tanks and from the storage tanks to each of the emergency diesel generator (EDG) rooms (approximate total length of 160 feet) and a portion of the ¾" diameter Indian Point 3 city water piping (approximate total length of 40 feet) that runs in the EDG pipe trench.

The above piping will be periodically inspected under the Buried Piping and Tanks Inspection Program at a frequency that meets or exceeds NUREG-1801 Section XI.M41 guidance for underground piping which will ensure the effects of aging are adequately managed. Attachment 1 identifies changes to the service water, city water and fuel oil systems aging management review tables that result from the clarification identified in this letter.

If you have any questions, or require additional information, please contact Mr. Robert Walpole at 914-254-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 10/18/12.

Sincerely,

FRD/rw

Attachment: 1. Changes to the Indian Point LRA Service Water, City Water, and Fuel Oil Systems Aging Management Review Tables

cc: Mr. William Dean, Regional Administrator, NRC Region I
Mr. Sherwin E. Turk, NRC Office of General Counsel, Special Counsel
Mr. Dave Wrona, NRC Branch Chief, Engineering Review Branch I
Mr. John Daily, NRC Sr. Project Manager, Division of License Renewal
Mr. Douglas Pickett, NRR Senior Project Manager
Ms. Bridget Frymire, New York State Department of Public Service
NRC Resident Inspector's Office
Mr. Francis J. Murray, Jr., President and CEO NYSERDA

ATTACHMENT 1 TO NL-12-149

CHANGES TO THE INDIAN POINT LRA SERVICE WATER,

CITY WATER, AND FUEL OIL SYSTEMS AGING MANAGEMENT REVIEW TABLES

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

The following identifies changes to the service water system and fuel oil system aging management review tables as a result of the clarification identified in this letter.

Changes are shown with underlines for additions.

Table 3.3.2-2-IP3: Service Water System								
Component Type	**Intended Function**	**Material**	**Environment**	**Aging Effect Requiring Management**	**Aging Management Programs**	**NUREG-1801 Vol. 2 Item**	**Table 1 Item**	**Notes**
Piping	Pressure boundary	Carbon steel	Condensation (ext)	Loss of material	Buried Piping and Tanks Inspection	VII.I-11 (A-81)	3.3.1-58	E

Table 3.3.2-13-IP2: Fuel Oil Systems								
Component Type	**Intended Function**	**Material**	**Environment**	**Aging Effect Requiring Management**	**Aging Management Programs**	**NUREG-1801 Vol. 2 Item**	**Table 1 Item**	**Notes**
Piping	Pressure boundary	Carbon steel	Air – outdoor (ext)	Loss of material	Buried Piping and Tanks Inspection	VII.H1-8 (A-24)	3.3.1-60	E

Table 3.3.2-13-IP3: Fuel Oil Systems								
Component Type	**Intended Function**	**Material**	**Environment**	**Aging Effect Requiring Management**	**Aging Management Programs**	**NUREG-1801 Vol. 2 Item**	**Table 1 Item**	**Notes**
Piping	Pressure boundary	Carbon steel	Air – outdoor (ext)	Loss of material	Buried Piping and Tanks Inspection	VII.H1-8 (A-24)	3.3.1-60	E

Table 3.3.2-17-IP3: City Water								
Component Type	**Intended Function**	**Material**	**Environment**	**Aging Effect Requiring Management**	**Aging Management Programs**	**NUREG-1801 Vol. 2 Item**	**Table 1 Item**	**Notes**
Piping	Pressure boundary	Copper Alloy	Air - outdoor (ext)	Loss of material	Buried Piping and Tanks Inspection	--	--	G