



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 15, 2012

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING PROPOSAL TO ALIGN THE
REFUELING WATER STORAGE TANK AND THE SPENT FUEL POOL
PURIFICATION SYSTEM (TAC NO. ME9263)

Dear Sir or Madam:

By letter dated August 14, 2012, Entergy Nuclear Operations, Inc., the licensee, submitted a license amendment application that would revise Technical Specification 3.5.4, "Refueling Water Storage Tank," such that the non-seismically qualified piping of the spent fuel pool purification system may be connected to the refueling water storage tank's seismic piping for a limited period of time under administrative controls.

The Nuclear Regulatory Commission's Health Physics and Human Performance Branch staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). Based on our discussions, we understand that a response to the RAI will be provided by December 10, 2012.

Please contact me at (301) 415-1364 if you have any questions on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas V. Pickett".

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

ENTERGY NUCLEAR OPERATIONS, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

DOCKET NO. 50-286

By letter dated August 14, 2012, Entergy Nuclear Operations, Inc. (Entergy) requested a license amendment to the Indian Point, Unit 3 (IP3) Technical Specification (TS) 3.5.4 as appended to the Operating License DPR-64, to allow the non-seismically qualified piping of the Spent Fuel Pool (SFP) purification system to be connected to the Refueling Water Storage Tanks (RWST) seismic piping by manual operation of a RWST seismically qualified boundary valve under administrative controls for a limited period of time (i.e., 14 days per fuel cycle).

The Health Physics and Human Performance Branch performed a preliminary review of the human performance associated with the license amendment request. The licensee's responses to the following request for additional information will allow the staff to complete its review in a timely manner.

1. Describe the review of operating experience that was done in support of the proposed TS change. Provide copies of any corrective action items that identified problems involving the SFP purification system or operation of the RWST boundary valves, or if too numerous, provide a summary of problems and the preventive actions taken.
2. On page 4 of 7 of Attachment 1 to the licensee's submittal, it is stated, "The calculated time for operator action to close AC-725 or AC-727A and terminate flow is 46 minutes based on discharge from one end of the purification loop." Further down on that same page, it is stated, "The calculated time to reach the TS level of 35 feet 4 inches from 36 feet is 46 minutes." By these statements it appears that there is no margin, that is, it will take the operator the full 46 minutes to terminate flow from the RWST in time to comply with the TS limit. Please clarify or justify why no margin is necessary.
3. On page 3 of 7 of Attachment 1 to the licensee's submittal, it is stated, "There is no dedicated operator..." On page 4 of 7, the licensee states that the procedure associated with purifying the RWST requires "designated operators" to walk down the location of the refueling water purification pump switch and the four relevant valves. Traditionally, the NRC defines "dedicated" as being assigned to a certain task and no other(s), while "designated" means that a specific person is assigned to a task, but may have other assignments. Clarify whether a dedicated or a designated operator will be used, or whether operators will be neither dedicated nor designated. The NRC staff has not approved this kind of TS change, to date, without the use of a dedicated operator.
4. Describe the process used to validate the effectiveness of the procedures referenced in the submittal.

Enclosure

5. Provide a copy of Procedure 3-SOP-SI-003, "Recirculation and or Purification of the Refueling Water Storage Tank".
6. What verification and validation (V&V) processes were used to determine that the relevant operator actions could be done effectively and within the time constraints involved? What sample of operators was used during V&V testing?
7. Does IP3 have a Time-critical Action Program to protect high-risk, time-limited actions from inadvertent change? If yes, is the proposed task sequence included in that program? If no, what controls are used to prevent inadvertent changes to the proposed operator actions or the time available to perform them?
8. What cue(s) call the operators' attention to the Critical Functions Monitoring System when a computer point is in alarm?

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/RA/

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