

United States Nuclear Regulatory Commission Official Hearing Exhibit

In the Matter of: Entergy Nuclear Operations, Inc.
(Indian Point Nuclear Generating Units 2 and 3)



ASLBP #: 07-858-03-LR-BD01
Docket #: 05000247 | 05000286
Exhibit #: NRC000021-00-BD01
Admitted: 10/15/2012
Rejected:
Other:
Identified: 10/15/2012
Withdrawn:
Stricken:



Entergy®

NRC000021

Submitted: March 29, 2012

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Fred Dacimo
Vice President
Operations License Renewal

NL-12-032

January 30, 2012

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

SUBJECT: Correction to Previous Response Regarding Unit 1 Buried Piping
Indian Point Nuclear Generating Unit Nos. 1, 2 & 3
Docket Nos. 50-003, 50-247 and 50-286
License Nos. DPR-5, DPR-26 and DPR-64

- REFERENCE:**
1. NRC Letter dated December 30, 2008, "Request for Additional Information for the Review of the Indian Point Nuclear Generating Unit Numbers 2 and 3, License Renewal Application – Miscellaneous Items"
 2. Entergy letter (NL-09-018), "Reply to Request for Additional Information – Miscellaneous Items," dated January 27, 2009
 3. NRC Letter dated May 20, 2009, "Request for Additional Information for the Review of the Indian Point Nuclear Generating Unit Numbers 2 and 3, License Renewal Application - Offsite Power, Refueling Cavity, and Unit 2 auxiliary Feedwater Pump Room Fire Event"
 4. Entergy letter (NL-09-079), "Reply to Request for Additional Information Regarding Offsite Power, Refueling Cavity, and Unit 2 Auxiliary Feedwater Pump Room Fire Event," dated June 12, 2009

Dear Sir or Madam:

Entergy Nuclear Operations, Inc is providing a correction, as shown in Attachment 1 and Attachment 2, to the response provided by references 2 and 4 for license renewal application (LRA) Table 3.4.2-5-11-IP2. Entergy discovered an omission in the response to Request for Additional Information RAI's 2.3.A.4.5-2, 3.4.2-1, and 3.4.2-2. This condition was recorded in the Indian Point Energy Center (IPEC) Corrective Action Program.

Reference 2 added components to the scope of license renewal for the auxiliary feedwater pump room fire event. Reference 4 provided additional information on aging management review results for added components. In these RAI's, the portion of the Unit 1 river water system from the pump discharge to the intertie to Indian Point Unit 2 service water system was added to the scope of license renewal. The components in this portion of the river water system were added to the new LRA Table 3.4.2-5-11-IP2. The table identified only outdoor air as the external environment for the piping. In accordance with IPEC drawings, a portion of this piping

FSME00
A128
NIPU
FSME

is buried and line items of piping and bolting with a soil environment should be included in Table 3.4.2-5-11-IP2. Appendix B.1.6 of the license renewal application should include the Unit 1 river water system in the list of systems containing components managed by the Buried Piping and Tanks Inspection Program. The buried piping in the river water system that is subject to aging management review had been included and remains in the IPEC buried piping program established in response to the industry initiative on buried piping.

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

January 30, 2012

Sincerely,



FRD/cbr

- Attachment: 1. Revised Table 3.4.2-5-11-IP2
2. Revised Appendix B.1.6

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. Robert F. Kuntz, NRC Sr. Project Manager, Division of License Renewal
Mr. John Boska, NRR Senior Project Manager
Mr. Paul Eddy, 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-12-032

Correction to Previous Response Regarding Unit 1 Buried Piping

REVISED TABLE 3.4.2-5-11-IP2

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 1, 2 & 3
DOCKET NOS. 50-003, 50-247 AND 50-286**

Summary of Aging Management Review

Table 3.4.2-5-11-IP2: River Water Service System								
Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG-1801 Vol. 2 Item	Table 1 Item	Notes
<u>Bolting</u>	<u>Pressure boundary</u>	<u>Carbon steel</u>	<u>Soil (ext)</u>	<u>Loss of material</u>	<u>Buried Piping and Tanks Inspection</u>	<u>VII.C1-18 (A-01)</u>	<u>3.3.1-19</u>	<u>C</u>
<u>Piping</u>	<u>Pressure boundary</u>	<u>Carbon steel</u>	<u>Soil (ext)</u>	<u>Loss of material</u>	<u>Buried Piping and Tanks Inspection</u>	<u>VII.C1-18 (A-01)</u>	<u>3.3.1-19</u>	<u>A</u>

ATTACHMENT 2 TO NL-12-032

Correction to Previous Response Regarding Unit 1 Buried Piping

Revised Appendix B.1.6

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 1, 2 & 3
DOCKET NOS. 50-003, 50-247 AND 50-286**

B.1.6 BURIED PIPING AND TANKS INSPECTION

Program Description

The Buried Piping and Tanks Inspection Program is a new program that includes (a) preventive measures to mitigate corrosion and (b) inspections to manage the effects of corrosion on the pressure-retaining capability of buried carbon steel, gray cast iron, and stainless steel components. Preventive measures are in accordance with standard industry practice for maintaining external coatings and wrappings. Buried components are inspected when excavated during maintenance. If trending within the corrective action program identifies susceptible locations, the areas with a history of corrosion problems are evaluated for the need for additional inspection, alternate coating, or replacement. The program applies to buried components in the following systems.

- Safety injection
- Service water
- Fire protection
- Fuel oil
- Security generator
- City water
- Plant drains
- Auxiliary feedwater
- Containment isolation support
- River water service (IP1)