

IPRenewal NPEmails

From: Green, Kimberly
Sent: Wednesday, July 17, 2013 3:39 PM
To: Waters, Roger M.
Cc: IPRenewal NPEmails
Subject: RAI letter on 480V MEB
Attachments: ML13186A169.pdf

Roger,

Attached is a copy of the RAI letter that was issued today. It will be publicly available in ADAMS shortly.

Kim

Hearing Identifier: IndianPointUnits2and3NonPublic_EX
Email Number: 4312

Mail Envelope Properties (F5A4366DF596BF458646C9D433EA37D701090B041879)

Subject: RAI letter on 480V MEB
Sent Date: 7/17/2013 3:38:31 PM
Received Date: 7/17/2013 3:38:33 PM
From: Green, Kimberly

Created By: Kimberly.Green@nrc.gov

Recipients:
"IPRenewal NPEmails" <IPRenewal.NPEmails@nrc.gov>
Tracking Status: None
"Waters, Roger M." <rwater1@entergy.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	147	7/17/2013 3:38:33 PM
ML13186A169.pdf	230603	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:



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

July 17, 2013

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE
RENEWAL APPLICATION, SET 2013-03 (TAC NOS. MD5407 AND MD5408)

Dear Sir or Madam:

By letter dated April 23, 2007, as supplemented by letters dated May 3, 2007, and June 21, 2007, Entergy Nuclear Operations, Inc. (Entergy), submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses for Indian Point Nuclear Generating Unit Nos. 2 and 3, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff documented its findings in the Safety Evaluation Report (SER) related to the license renewal of Indian Point Nuclear Generating Unit Nos. 2 and 3, which was issued August 2009 and supplemented August 30, 2011 (SER Supplement 1).

By letter dated May 6, 2013, Entergy proposed a change to the license renewal application regarding the Metal Enclosed Bus (MEB) Inspection Program and the associated regulatory commitments. The staff has reviewed the proposed change and has identified the need for additional information, which is enclosed.

This RAI was discussed with Mr. Roger Waters, and a mutually agreeable date for Entergy's response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-8064, or by e-mail at Yaira.Diaz.Sanabria@nrc.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Yaira Diaz-Sanabria", is written over the typed name.

Yaira Diaz-Sanabria, Chief
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:
As stated

cc: Listserv

July 17, 2013

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

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Sincerely,

/RA/

Yaira Diaz-Sanabria, Chief
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:
As stated

cc: Listserv
DISTRIBUTION: See next page

ADAMS Accession No.: ML13186A169

*concurred via email

OFFICE	LA:DLR/RPB1*	APM: DLR/RAPB	BC:DLR/RPB1	APM: DLR/RAPB
NAME	YEdmonds	KGreen	YDiaz-Sanabria	KGreen
DATE	7/15/2013	7/16/2013	7/17/2013	7/16/2013

OFFICIAL RECORD COPY

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE
RENEWAL APPLICATION, SET 2013-03 (TAC NOS. MD5407 AND MD5408)

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APatel, RI

REQUESTS FOR ADDITIONAL INFORMATION, SET 2013-03
RELATED TO INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
LICENSE RENEWAL APPLICATION
DOCKET NOS. 50-247 AND 50-286

CHANGES TO THE METAL ENCLOSED BUS INSPECTION PROGRAM

RAI 3.0.3.2.11-1

Background:

On April 23, 2007, Entergy Nuclear Operations, Inc. (Entergy or the applicant) applied for renewal of the operating licenses for Indian Point Nuclear Generating Units 2 and 3 (IP2 and IP3). The Metal Enclosed Bus (MEB) Inspection Program is described in license renewal application (LRA) Section B.1.20 and includes an enhancement to revise appropriate procedures to add the 480V MEB associated with Substation A to the scope of the program. This enhancement is also reflected in the LRA Updated Final Safety Evaluation Report (UFSAR) Section A.2.1.19. Entergy considered this MEB to be within the scope of license renewal because it provides ac power to the IP2 diesel fire pump (DFP).

By letter dated May 6, 2013, Entergy stated that it is making a change to the LRA regarding the MEB Inspection Program and the associated regulatory commitments. Specifically, based on a recent evaluation, Entergy determined that the 480V MEB is not used for starting the DFP, but it is used to maintain batteries in a charged state, which in turn provide dc power for starting the DFP and power instrumentation. Entergy stated that any loss of the 480V MEB associated with Substation A would initiate an automatic start of the DFP via the batteries. Therefore, the 480V MEB associated with Substation A does not perform a license renewal intended function and thus, Entergy is removing the 480V MEB from the scope of program.

Issue:

Title 10 of the *Code of Federal Regulations* 10 CFR 54.4(a)(3) requires, in part, that all systems, structures, and components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulation for fire protection (10 CFR 50.48) are within the scope of license renewal. This is iterated in Section 2.1.3.1.3 of NUREG-1800, Revision 1, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," which includes the following example:

...if an NSR diesel generator is required for safe shutdown under the fire protection plan, the diesel generator and all SSCs specifically relied upon for that generator to comply with NRC regulations shall be included within the scope of license renewal under 10 CFR 54.4(a)(3). Such SSCs may include, but should not be limited to, the cooling water system or systems relied upon for operability, the diesel support pedestal, and any applicable power supply cable specifically relied upon for safe shutdown in the event of a fire.

The DFP is relied upon to demonstrate compliance with the Commission's regulation for fire protection, and therefore, is within the scope of license renewal. The staff considers the MEB associated with 480V Substation A to be within the scope of license renewal because it provides ac power to the chargers to maintain the DFP batteries at full charge. The fully charged

ENCLOSURE

batteries will be able to start the DFP during the fire events. It appears that if the 480V MEB is not part of an aging management program, the batteries which start the DFP may become depleted and unable to perform their intended function.

Request:

Provide a technical justification for why the 480V MEB Substation A is not relied upon for the DFP to demonstrate compliance with NRC regulations. Please refer to any applicable documents or statements in your current licensing basis to support your justification.