ENT000614
Submitted: July 22, 2013

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Fred Dacimo
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NL-13-093

July 15, 2013

U.S. Nuclear Regulatory Commission
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SUBJECT: Correction to a Previous Response Regarding the Unit 2 Auxiliary Feedwater Pump Room Fire Event
Indian Point Nuclear Generating Unit Nos. 2 & 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

REFERENCE: Entergy letter (NL-12-123)," Correction to Previous Responses Regarding Unit 1 Buried Piping and Unit 2 Auxiliary Feedwater Pump Room Fire Event," dated September 26, 2012

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. is providing changes to the response provided by the referenced letter (NL-12-123). Entergy has determined that portions of the Unit 2 Instrument Air System previously credited for performing functions in the scope of license renewal and identified as subject to aging management review (AMR) are buried in soil but were not identified as buried in the referenced letter. This omission requires limited revisions to an AMR table for the Auxiliary Feedwater Pump Room Fire Event and Appendices A and B of the License Renewal Application (LRA), as identified in the attachment. In addition, the attachment identifies changes made to clarify that titanium components are included in the One-Time Inspection Program. The changes are consistent with the One-Time Inspection Program described in LRA Section B.1.27.

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 7/15/13.

Sincerely,

FRD/rw

Attachment: LRA changes to the Auxiliary Feedwater Pump Room Fire Event Table and Appendices A and B

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
Ms. Kimberly Green, NRC Sr. Project Manager, Division of License Renewal
Mr. Douglas Pickett, NRR Senior Project Manager
Ms. Bridget Frymire, New York State Public Service Commission
NRC Resident Inspector's Office
Mr. Francis J. Murray, Jr., President and CEO NYSERDA

ATTACHMENT TO NL-13-093

LRA changes to the Auxiliary Feedwater Pump Room Fire Event Table and Appendices A and B

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

The following are changes to the LRA determined necessary during review of completed buried piping inspections. One line item is added to aging management review table 3.4.2-5-7-IP2. The change to Appendix A adds copper alloy to the list of relevant materials. The change to Appendix B adds the instrument air system to the list of systems to which the program applies. Additions are underlined.

Table 3.4.2-5-7-IP2
Instrument Air System
Components Required to Support AFW Pump Room Fire Event
Summary of Aging Management Review

Table 3.4.2-5-7-IP2 Instrument Air System (IA)								
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	Soil (ext)	Loss of material	Buried Piping and Tanks Inspection	--	--	G

A.2.1.5 Buried Piping and Tanks Inspection Program

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 and underground carbon steel, copper alloy, 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.

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 and underground carbon steel, gray cast iron, copper alloy 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)
- Circulating Water System (IP2)
- Instrument Air (IP2)

In addition to the above changes, the following table changes are being made to clarify that the One-Time Inspection Program includes titanium components in the condensate system and lube oil system. The changes add notes 404 and 405 to explicitly indicate that the One-Time Inspection Program applies to titanium component types that credit the Water Chemistry Control - Primary and Secondary Program and the Oil Analysis Program. Additions are underlined.

Table 3.4.2-5-2-IP2
Condensate System
Components Required to Support AFW Pump Room Fire Event
Summary of Aging Management Review

Table 3.4.2-5-2-IP2 Condensate System (Cond)								
Component Type	**Intended Function**	**Material**	**Environment**	**Aging Effect Requiring Management**	**Aging Management Programs**	**NUREG-1801 Vol. 2 Item**	**Table 1 Item**	**Notes**
Heat exchanger tubes	Pressure boundary	Titanium	Steam (ext)	Loss of material	Water Chemistry Control – Primary & Secondary	--	--	$F_{\perp}$ 404
Heat exchanger tubes	Heat transfer	Titanium	Steam (ext)	Fouling	Water Chemistry Control – Primary & Secondary	--	--	$F_{\perp}$ 404
Heat exchanger tubes	Pressure boundary	Titanium	Treated water (int)	Loss of material	Water Chemistry Control – Primary & Secondary	--	--	$F_{\perp}$ 404
Heat exchanger tubes	Heat transfer	Titanium	Treated water (int)	Fouling	Water Chemistry Control – Primary & Secondary	--	--	$F_{\perp}$ 404

Table 3.4.2-5-10-IP2
Lube Oil System
Components Required to Support AFW Pump Room Fire Event
Summary of Aging Management Review

Table 3.4.2-5-10-IP2 Lube Oil System (LO)								
Component Type	**Intended Function**	**Material**	**Environment**	**Aging Effect Requiring Management**	**Aging Management Programs**	**NUREG-1801 Vol. 2 Item**	**Table 1 Item**	**Notes**
Heat exchanger tubes	Pressure boundary	Titanium	Lube oil (ext)	Loss of material	Oil Analysis	--	--	$F_{\perp}$ 405
Heat exchanger tubes	Heat transfer	Titanium	Lube oil (ext)	Fouling	Oil Analysis	--	--	$F_{\perp}$ 405