

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

December 2, 2014

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

SUBJECT: REISSUE OF REQUEST FOR ADDITIONAL INFORMATION 3.0.3-2 FROM SET 2014-01 FOR THE REVIEW OF THE INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE RENEWAL APPLICATION (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 in August 2009 and supplemented on August 30, 2011 (SER Supplement 1), and on November 6, 2014 (SER Supplement 2).

Subsequent to the issuance of SER Supplement 1, the staff identified additional operating experience (OE) at several nuclear power plants regarding recurring internal corrosion, corrosion occurring under insulation, managing aging effects of fire water system components, and loss of coating integrity of internal coatings. To address this OE, the staff issued interim staff guidance (ISG) documents, either as final or draft.

By letter dated April 1, 2014, the staff issued RAI 3.0.3-2 requesting detailed information on how Entergy plans to manage aging effects on internal coatings. This request was based on information in draft LR-ISG-2013-01. On November 14, 2014, the staff issued the final version of LR-ISG-2013-01. Because the LR-ISG has been issued as a final document, the staff is withdrawing its previous request to allow Entergy to utilize the final guidance. The enclosed RAI should replace the previous RAI issued on April 1, 2014.

This RAI was discussed with Mr. Roger Waters, and a mutually agreeable date for Entergy's response is February 27, 2015. If you have any questions, please contact me at 301-415-1627, or by e-mail at <u>Kimberly.Green@nrc.gov</u>.

Sincerely,

# /**RA**/

Kimberly Green, Sr. Mechanical Engineer Aging Management of Plant Systems Branch Division of License Renewal Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure: As stated

cc w/encl: Listserv

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### ADAMS Accession No.: ML14325A198

#### \*Concurred via e-mail

OFC	LA:DLR:RPB1*	PM:DLR:RASB	BC:DLR:RPB1	PM:DLR:RASB
NAME	YEdmonds	KGreen	YDiaz-Sanabria (JDaily for)	KGreen
DATE	11/24/14	12/1/14	12/2/14	12/2/14

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Letter to Entergy Nuclear Operations, Inc. from K. Green dated December 2, 2014

SUBJECT: REISSUE OF REQUEST FOR ADDITIONAL INFORMATION 3.0.3-2 FROM SET 2014-01 FOR THE REVIEW OF THE INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE RENEWAL APPLICATION (TAC NOS. MD5407 AND MD5408)

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## REQUEST FOR ADDITIONAL INFORMATION REISSUE OF RAI 3.0.3-2 FROM SET 2014-01 RELATED TO INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3 LICENSE RENEWAL APPLICATION DOCKET NOS. 50-247 AND 50-286

## RAI 3.0.3-2

On April 1, 2014, the staff issued RAI 3.0.3-2 to obtain information regarding how Entergy plans to manage the effects of aging on internal coatings based on guidance in draft license renewal interim staff guidance (LR-ISG)-2013-01, "Aging Management of Loss of Coating or Lining Integrity for Internal Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks" (ADAMS Accession No. ML14084A387). The request sought detailed information to allow the staff to determine how the effects of aging on internal coatings in certain components will be managed at Indian Point.

On November 14, 2014, the staff issued final LR-ISG-2013-01, which contains new recommendations related to managing loss of coating integrity for coatings applied to the internal surfaces of piping, piping components, heat exchangers, and tanks within the scope of license renewal (ADAMS Accession No. ML14225A059).

As described in License Renewal Interim Staff Guidance Process, Revision 2 (ADAMS Accession No. ML100920158), "applicants may reference an LR-ISG in the LRA, or may address it as part of the license renewal regulatory review process, either by responding to a request for additional information, addressing an open item in the draft SER, or by supplementing the LRA. Applicants may propose and justify approaches for complying with the regulations that are different from the staff-accepted approaches in LR-ISGs or the license renewal guidance documents."

Because the LR-ISG has been issued as final guidance, the staff withdraws its previous request to allow Entergy to utilize the final guidance to demonstrate the adequacy of its plans to manage the effects of aging on internal coatings. In this regard, the staff issues the following RAI.

Provide details on how the guidance in LR-ISG-2013-01 will be accounted for in your aging management programs and aging management review (AMR) items for the Indian Point License Renewal Application. If the recommendations in the LR-ISG will not be incorporated, state an exception and provide the technical basis for the exception. If necessary, provide revisions to Appendix A, Appendix B, and the AMR tables in LRA Section 3.