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NL-14-144

December 9, 2014

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11545 Rockville Pike, TWFN-2 F1  
Rockville, MD 20852-2738

**SUBJECT:** Revision to Proposed License Amendment Regarding Extending the Containment Type A Leak Rate Testing Frequency to 15 years  
Indian Point Unit Number 3  
Docket No. 50-286  
License No. DPR-64

**Reference** Entergy Letter (NL-14-014) to NRC Regarding Proposed License Amendment Regarding Extending the Containment Type A Leak Rate Testing Frequency to 15 years, dated February 4, 2014

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc, (Entergy) requested, in the referenced letter, a License Amendment to Operating License DPR-64, Docket No. 50-286 for Indian Point Nuclear Generating Unit No. 3 (IP3). The proposed TS change contained would revise Appendix A, Technical Specifications (TS), to allow extension of the ten-year plus 15-month frequency of the Type A or Integrated Leak Rate Test (ILRT) that is required by Technical Specification (TS) 5.5.15 to 15 years on a permanent basis.

In the referenced letter, Entergy evaluated the proposed change in accordance with 10 CFR 50.91(a)(1) using the criteria of 10 CFR 50.92(c) and determined that this proposed change involves no significant hazards. Entergy also provided a marked up Technical Specification page to reflect the revision. In a telecom on November 12, 2014, the NRC Staff advised Entergy that the NEI 94-01 Revision 2A was the appropriate reference for extending the Type A testing frequency. The referenced NEI 94-01 Revision 3A is appropriate for an extension of testing frequencies for Type B and C testing. The evaluation of the proposed change in accordance with 10 CFR 50.91(a)(1) contained in the reference letter has not been revised to reflect Revision 2A since this is primarily an editorial change. The Reference letter and this proposed Technical Specification change both adopt ANSI/ANS 56.8 – 2002 for Type A testing as well as Type B and C testing. The marked up Technical Specification page in the reference letter was affected by this change to Revision 2A and the revised page is in the attachment. The assessment of the risk impact of extending the ILRT interval is provided in the reference letter remains unchanged. A copy of this letter and the associated attachments are being submitted to the designated New York State official in accordance with 10 CFR 50.91.

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Entergy requests approval of the proposed amendment by January 15, 2015 and an allowance of 30 days for implementation. There are no new commitments being made in this submittal. If you have any questions or require additional information, please contact Mr. Robert Walpole, Manager, Regulatory Assurance at (914) 254-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 9<sup>th</sup>, 2014.

Sincerely,



LC/sp

Attachment: Marked Up Technical Specifications Page for Proposed Changes Regarding  
15 Year Containment ILRT

cc: Mr. Douglas Pickett, Senior Project Manager, NRC NRR DORL  
Mr. Daniel H. Dorman, Regional Administrator, NRC Region 1  
NRC Resident Inspector  
Mr. John B. Rhodes, President and CEO, NYSERDA  
Ms. Bridget Frymire, New York State Dept. of Public Service

ATTACHMENT TO NL-14-144

MARKED UP TECHNICAL SPECIFICATIONS PAGE FOR PROPOSED  
CHANGES REGARDING 15 YEAR CONTAINMENT ILRT

Changes indicated by lineout for deletion and Bold/Italics for additions

**Unit 3 Affected Page:  
5.0-30**

## 5.5 Programs and Manuals

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### 5.5.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with **NEI 94-01, Revision 2A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," October 2008** ~~the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, dated September 1995"~~, as modified by the following exception:

**ANS 56.8-2002** ~~ANS 56.8-1994~~, Section 3.3.1: WCCPPS isolation valves are not Type C tested.

The maximum allowable primary containment leakage rate,  $L_a$ , at a minimum test pressure equal to  $P_a$ , shall be 0.1% of primary containment air weight per day.  $P_a$  is the peak calculated containment internal pressure related to the design basis accident.

Leakage acceptance criteria are:

- a. Containment leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the Type B and C tests and  $\leq 0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  - 1) Overall air lock leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ ,
  - 2) For each door, leakage rate is  $\leq 0.01 L_a$  when pressurized to  $\geq P_a$ ,
- c. Isolation Valve Seal Water System leakage rate acceptance criterion is  $\leq 14,700$  cc/hr at  $\geq 1.1 P_a$ .
- d. Acceptance criterion for leakage into containment from isolation valves sealed with the service water system is  $\leq 0.36$  gpm per fan

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(continued)