

# Allegation for Indian Point

I have received communication from an individual that a failure of the existing gas lines traversing the protected area of Indian Point is or should be considered a Design Bases Event (DBE)

This conclusion is based upon Entergy's risk analysis submitted to the NRC on August 21, 2014. This analysis concluded that the new proposed 42 inch natural gas lines would be considered a DBE, therefore the failure of existing lines located even closer to vital structures logically would also be considered a DBE.

According to the NRC's own analysis the probability of a gas line failure the "accident rate of pipes greater than 20 inches diameter is about  $5 \times 10^{-4}$ /mile-yr." This assumption is based on new piping and 60-year-old piping would be expected to have a much higher rate of failure. This is an unacceptably probability.

The present FSAR states this event "is not feasible." Both of these statements can't be accurate.

The specific allegation is as follows:

1. Both plants are presently operating in an unanalyzed condition. No analysis exists other than a fictitious statement in the FSAR that this event is not "feasible."
2. Entergy's analysis states: ". . . conclude that the rupture of the gas pipeline must be considered as a design basis event under NRC guidance."
3. Operations personnel have not been properly trained to deal with an event such as fire or explosion of these gas lines.
4. Some operations personnel are not even aware of the existence of these ancient active gas transmission lines.
5. The fire brigade, including offsite responders, has not been trained to respond to such an event.
6. There are no procedures available to counter this high probability event.
7. No risk analysis has been conducted for this event.
8. There is no documentation or requirements verifying the integrity of these gas transmission lines.
9. There are no automatic isolation valves or any isolation valves under the control of Indian Point to mitigate the consequences of this event.
10. Operations personnel are not aware of the location of these isolation valves.
11. These valves and piping were not considered in the relicensing application for buried piping.
12. Neither the licensee nor the NRC has imposed any requirements on the piping or the gas transmission line system within the protected area of Indian Point.

This is an immediate, major safety concern with an unacceptable probability and potential significant consequences.

I expect a prompt response to this concern. You are free to share this allegation with the licensee as 10 CFR 50.72 requires the licensee to submit an eight hour report for operating in an unanalyzed condition.

I am free to discuss this at any time with the NRC staff.