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Lawrence Coyle
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June 25, 2015

NL-15-082

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
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SUBJECT: Withdrawal of License Amendment Request Regarding Emergency Diesel Generator Fuel Oil Storage Supplies (TAC No. ME9264)
Indian Point Unit Number 3
Docket No. 50-286
License No. DPR-64

- REFERENCES:
1. Entergy Letter NL-12-097 to NRC Regarding License Amendment Request for Emergency Diesel Generator Fuel Oil System, dated August 14, 2012 (Accession No. ML12234A250)
 2. Entergy Letter NL-13-057 to NRC Regarding Response to Request For Additional Information Regarding Emergency Diesel Generator Fuel Oil System (TAC No. ME9264), dated April 15, 2013
 3. Entergy Letter NL-13-102 to NRC Regarding Response to Request For Additional Information Regarding Emergency Diesel Generator Fuel Oil Supplies (TAC No. ME9264), dated July 23, 2013
 4. Entergy Letter NL-14-053 to NRC Regarding Request For Additional Information Regarding Emergency Diesel Generator Fuel Oil Supplies (TAC No. ME9264), dated July 23, 2013

Dear Sir or Madam:

The purpose of this letter is to withdraw a License Amendment request. Entergy Nuclear Operations, Inc. (Entergy) requested, Reference 1, a License Amendment to Operating License DPR-64, Docket No. 50-286 for Indian Point Nuclear Generating Unit No. 3 (IP3). This was supplemented in three responses (Reference 2, 3, and 4) to requests for additional information. The proposed changes would have revised Technical Specification (TS) Limiting Condition for Operation (LCO) 3.8.3, "Diesel Fuel Oil, and Starting Air," to relocate specific numerical values for fuel oil storage volumes from the TSs to the TS Bases in accordance with Technical Specification Task Force (TSTF) 501 Revision 1.

ADD
MLC

The amendment proposed by Entergy was based on TSTF-510-A Rev 1. The TSTF removes the fuel oil requirements from the Technical Specifications to the Bases. It requires that the fuel oil consumption be determined using specific methodology. The TSTF states “the fuel oil storage requirements should either be based on the assumption that the diesel generator operates continuously for 7 days at its rated capacity or calculations based on the time-dependent loads of the diesel generator.” Entergy used the rated capacity to calculate fuel oil requirements. However, this approach reduced the amount of time each individual storage tank would supply the associated Emergency Diesel Generator (EDG) before being refilled to less than the existing 48 hours.

This proposed Technical Specification is being withdrawn because Entergy is unable to meet the Staff position that each EDG must be capable of operation using just the associated fuel oil storage tank for 48 hours. While this might be feasible using the time dependent load approach, there are no current calculations to support this or to show the load management required to do this would be an acceptable operational practice. Entergy will continue discussions with NRC staff on the feasibility of resubmitting a new amendment that will meet NRC Staff requirements.

In the meantime, the current licensing basis for the three EDG fuel oil storage tanks associated with the Emergency Diesel Generators (EDGs) will remain as described in the TS bases and FSAR section 8.2. Entergy plans to maintain a reserve margin of 6921 gallons of fuel oil in the fuel oil storage tanks (operations standing order 11-10) to account for any additional issues that may arise regarding fuel oil requirements (e.g., low sulfur). The FSAR says:

“The minimum required usable inventory for each of the three storage tanks is specified in the Technical Specifications. The safety design criteria are based on the need to provide adequate fuel to support forty-eight (48) hour operation of minimum safeguards equipment following a design basis accident. The minimum required inventory (gallons) for fulfillment of the safety design criterion is based on the following:

	31 Tank	32 Tank	33 Tanks
Calculated consumption (TS Required Usable)	5,365	5,365	5,365
Margin reduction due to re-coating	20	20	20
Level indication uncertainty	50	50	50
Unusable (pump cutoff worst case drift)	915	915	956
Total minimum required inventory	6,350	6,350	6,391”

“A usable amount of 37556 gallons of fuel oil is required to operate two emergency diesels at minimum safeguards load continuously for 168 hours.... There are two 30,000 gallon seismic Class III tanks located in the Indian Point 1 Superheater Building and a 200,000 gallon seismic Class III tank in the Buchanan Substation located immediately across Broadway. These tanks contain fuel oil for operation of the IP2 SBO / Appendix R diesel.”

“The following “minimum safeguards” equipment is required and assumed to be operating for a design basis event at Indian Point Unit 3:

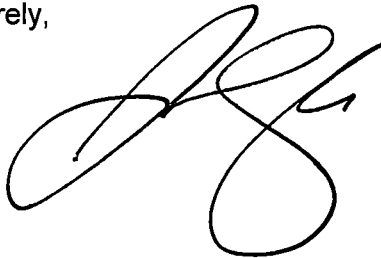
- 2 of 3 Safety Injection (SI) Pumps
- 1 of 2 Residual Heat Removal (RHR) Pumps
- 1 of 2 Motor Driven Auxiliary Feedwater (AFW) Pumps
- 1 of 2 Recirculation Pumps

3 of 5 Containment Recirculation (CR) Fans
1 of 2 Containment Spray (CS) Pumps
1 of 3 Nonessential Service Water (NE SW) Pumps
2 of 3 Essential Service Water (ESW) Pumps
1 of 3 Component Cooling Water (CCW) Pumps”

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 Affairs at (914) 254-6710.

Sincerely,

A handwritten signature in black ink, appearing to be 'RW', written in a cursive style.

LC/sp

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