

## IPRenewal NPEmails

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**From:** Wentzel, Michael  
**Sent:** Wednesday, July 08, 2015 11:29 AM  
**To:** Louie, Richard  
**Subject:** RE: RE: Draft Phone Call Summary  
**Attachments:** IP RAI Set 2015-02 (ML15170A456).pdf

Rich,

Here is a copy of the RAIs.

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**From:** Wentzel, Michael  
**Sent:** Tuesday, July 07, 2015 12:32 PM  
**To:** 'Louie, Richard'  
**Subject:** RE: RE: Draft Phone Call Summary

Thanks, Rich. I hope to get the RAIs issued within the next day.

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**From:** Louie, Richard [<mailto:rlouie@entergy.com>]  
**Sent:** Tuesday, July 07, 2015 12:30 PM  
**To:** Wentzel, Michael  
**Subject:** [External\_Sender] RE: Draft Phone Call Summary

Mike,

We have no comments on this.

Rich

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**From:** Wentzel, Michael [<mailto:Michael.Wentzel@nrc.gov>]  
**Sent:** Tuesday, July 07, 2015 8:42 AM  
**To:** Louie, Richard  
**Subject:** Draft Phone Call Summary

Rich,

Attached is a draft of the phone call summary from our phone call last week. Please let me know if you have any comments.

Thanks,  
Mike

Michael Wentzel  
Project Manager  
NRR/DLR/RPB2  
(301) 415-6459  
[michael.wentzel@nrc.gov](mailto:michael.wentzel@nrc.gov)

**Hearing Identifier:** IndianPointUnits2and3NonPublic\_EX  
**Email Number:** 5224

**Mail Envelope Properties** (ea5d9cf2509540d89c8249b1aa6b9cc2)

**Subject:** RE: RE: Draft Phone Call Summary  
**Sent Date:** 7/8/2015 11:29:06 AM  
**Received Date:** 7/8/2015 11:29:11 AM  
**From:** Wentzel, Michael

**Created By:** Michael.Wentzel@nrc.gov

**Recipients:**  
"Louie, Richard" <rlouie@entergy.com>  
Tracking Status: None

**Post Office:** HQPWMSMRS03.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	971	7/8/2015 11:29:11 AM
IP RAI Set 2015-02 (ML15170A456).pdf		173210

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**



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

July 7, 2015

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE  
RENEWAL APPLICATION, SET 2015-02 (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 to the U.S. Nuclear Regulatory Commission (NRC). The NRC 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 August 11, 2009 and supplemented August 30, 2011 (SER Supplement 1), and November 6, 2014 (SER Supplement 2).

Subsequent to the issuance of SER Supplement 1, the staff identified additional operating experience at several nuclear power plants regarding loss of coating integrity of internal coatings. To address this operating experience, on November 14, 2014, the NRC staff issued interim staff guidance document 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."

By letters dated April 1, 2014 and December 2, 2014, the NRC staff requested additional information as to how Entergy planned to manage the effects of aging as described in LR-ISG-2013-01. By letter dated March 10, 2015, Entergy responded to the NRC staff's request for additional information (RAI). Based on its review of the information contained in Entergy's letter, the NRC staff RAIs are as described in the enclosure.

This RAI was discussed with Mr. Richard Louie, and a mutually agreeable date for Entergy's response is within 60 days from the date of this letter.

- 2-

If you have any questions, please contact me at 301-415-6459, or by e-mail at [michael.wentzel@nrc.gov](mailto:michael.wentzel@nrc.gov).

Sincerely,

*/RA/*

Michael Wentzel, Project Manager  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:  
As stated

cc w/encl: Listserv

If you have any questions, please contact me at 301-415-6459, or by email at [michael.wentzel@nrc.gov](mailto:michael.wentzel@nrc.gov).

Sincerely,

*/RA/*

Michael Wentzel, Project Manager  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

Enclosure:  
As stated

cc: Listserv

**DISTRIBUTION:** See next page

**ADAMS Accession No.:** ML15170A456

\*concurring via email

<b>OFFICE</b>	LA:DLR	PM: DLR/RPB2	BC:DLR/RPB1	PM: DLR/RPB2
<b>NAME</b>	IBetts	MWentzel	YDiaz-Sanabria	MWentzel
<b>DATE</b>	6/22/15	7/6/15	7/6/15	7/7/15

**OFFICIAL RECORD COPY**

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3, LICENSE  
RENEWAL APPLICATION, SET 2015-02 (TAC NOS. MD5407 AND MD5408)

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DMcIntyre, OPA JSStewart, RI  
JWeil, OCA AmiPatel, RI

REQUEST FOR ADDITIONAL INFORMATION, SET 2015-02  
RELATED TO INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3  
LICENSE RENEWAL APPLICATION  
DOCKET NOS. 50-247 AND 50-286  
REGARDING LR-ISG-2013-01

**RAI 3.0.3-16**

Background

As amended by letter dated March 10, 2015, license renewal application (LRA)

Table 3.3.2-19-43-IP3, "Pressurizer System," states that loss of coating integrity is managed for metal components with internal coating in a "treated borated water > 140°F" environment by the Coating Integrity Program.

Issue

Environments with high temperatures are not evaluated to be bounding within the assumptions of Generic Aging Lessons Learned (GALL) aging management program (AMP) XI.M42, "Aging Management of Loss of Coating or Lining Integrity for Internal Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks." The changes to the LRA do not state the specific coating material used in systems with temperatures exceeding 140°F. Therefore, the staff lacks sufficient information to conclude that the guidance in AMP XI.M42 (e.g., inspection intervals, acceptance criteria) is sufficient for the materials exposed to temperatures greater than 140°F.

Request

State the coating materials exposed to temperatures greater than 140°F. Provide the basis for concluding that loss of coating integrity is adequately managed in the subject environment.

**RAI 3.0.3-17**

Background

As amended by letter dated March 10, 2015, LRA Sections A.2.1.42, A.3.1.42, and B.1.43, "Coating Integrity," state that the Coating Integrity Program will be implemented by December 31, 2024. In addition, Commitment 8, as revised, states that LRA Sections A.2.1.13, A.3.1.13 and B.1.14, "Fire Water System," will be implemented by December 31, 2019.

Issue

The implementation schedule for LRA Section B.1.43 ranges up to nine years, from 2015 to 2024. In addition, implementation of Commitment 8, as revised, ranges from 2015 to 2019. Standard Review Plan for License Renewal (SRP-LR) Table 3.0-1 for AMP XI.M42 states that the first inspections of internal coatings should be completed no later than the last refueling outage prior to the period of extended operation. The staff recognizes that Indian Point Generating Unit No. 2 has entered timely renewal and Indian Point Generating Unit No. 3 may shortly enter timely renewal. As such, it does not appear that the inspection section schedule recommended in Table 3.0-1 will be met. Further, it is not clear to the staff how loss of coating integrity will be managed in the time frame prior to the programs being implemented.

ENCLOSURE

Request

State how loss of coating integrity will be managed between now and the proposed implementation dates and the basis for concluding that coating integrity will be adequately managed in this time period.