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NL-15-112

August 28, 2015

U.S. Nuclear Regulatory Commission  
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Rockville, MD 20852-2738

SUBJECT: Indian Point Energy Center's Fifth Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745)  
Indian Point Unit Number 2  
Docket No. 50-247  
License No. DPR-26

- REFERENCES:
1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
  2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
  3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
  4. Entergy letter to NRC (NL-12-144), Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 29, 2012
  5. Entergy letter to NRC (NL-13-042), Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013
  6. Entergy letter to NRC (NL-13-110), Indian Point Energy Center's First Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated August 27, 2013

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(ML13247A032)

- 7 Entergy letter to NRC (NL-14-031), Indian Point Energy Center's Second Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated February 27, 2014 (ML14070A365)
- 8 Entergy letter to NRC (NL-14-110), Indian Point Energy Center's Third Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated August 27, 2014 (ML 14251A227)
- 9 Entergy letter to NRC (NL-15-025), Indian Point Energy Center's Fourth Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated February 26, 2015 (ML 15069A028)
- 10 Entergy letter to NRC (NL-15-059), Notification of Full Compliance with Order EA-12-049 "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" and Order EA-12-051 "Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation" (TAC Nos. MF0745 and MF0738) Indian Point Unit Number 3, dated May 20, 2015 (ML15149A140).

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Entergy. Reference 1 was immediately effective and directs Entergy to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Entergy initial status report regarding mitigation strategies. Reference 5 provided the Entergy overall integrated plan.

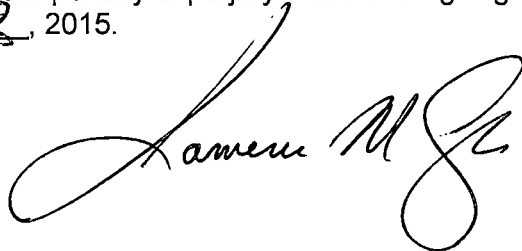
Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. Reference 6 provided the first six-month status report. Reference 7 provided the second six-month status report. Reference 8 provided the third six-month status report. Reference 9 provided the fourth six-month status report. The purpose of this letter is to provide the fifth six-month status report pursuant to

Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any. This update is applicable to IPEC Unit 2 only. IPEC Unit 3 has completed the Order requirements and has reported compliance to the Commission (Reference 10).

This letter contains no new regulatory commitments. Should you have any questions regarding this submittal, please contact Mr. Robert Walpole, Manager, Regulatory Affairs at (914) 254-6710.

I declare under penalty of perjury that the foregoing is true and correct; executed on August 28, 2015.

Sincerely,



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Attachment: Indian Point Energy Center's Fifth Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: Mr. Douglas V. Pickett, Senior Project Manager, NRC NRR DORL  
Mr. Daniel H. Dorman, Regional Administrator, NRC Region 1  
Mr. John Boska, Senior Project Manager, NRC NRR DORL  
NRC Resident Inspectors Office  
Mr. John B. Rhodes, President and CEO, NYSERDA  
Ms. Bridget Frymire, New York State  
Mr. Robert J. Fretz Jr., NRC NRR OE OB  
Mr. Robert L. Dennig, NRC NRR DSS SCVB  
Ms. Jessica A. Kratchman NRC NSIR DPR DDEP IRIB  
Mr. Eric E. Bowman, NRC NRR DPR PGCB  
Ms. Eileen M. Mckenna, NRC NRO DSRA BPTS NRC NRR DSS SCVB

ATTACHMENT TO NL-15-112

INDIAN POINT ENERGY CENTER'S FIFTH SIX-MONTH  
STATUS REPORT FOR THE IMPLEMENTATION OF ORDER  
EA-12-049 MODIFYING LICENSES WITH REGARD TO  
REQUIREMENTS FOR MITIGATION STRATEGIES FOR  
BEYOND-DESIGN-BASIS EXTERNAL EVENTS

ENTERGY NUCLEAR OPERATIONS, INC.  
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2  
DOCKET NOS. 50-247

**Indian Point Energy Center's Fifth Six Month Status Report  
for the Implementation of Order EA-12-049 Order Modifying  
Licenses with Regard to Requirements for Mitigation  
Strategies for Beyond-Design-Basis External Events**

## **1 Introduction**

Entergy Nuclear Operations, Inc. (Entergy) developed an Overall Integrated Plan (Reference 1) for Indian Point Energy Center (IPEC), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the last status report (Reference 8), including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

Entergy submitted a Notification of Full Compliance with Order EA-12-049 for IPEC Unit 3 on May 20, 2015 (Reference 9). The notification stated that:

*Attachment 1 [of the Notification of Full Compliance letter] provides a brief summary of the key elements associated with compliance to Order EA-12-049 for IP3. A listing of each item that has not been docketed as closed by the NRC from the Open and Confirmatory Items identified in the Interim Staff Evaluation (Reference 3), Open items in the OIP (Reference 3), and Audit questions and open items (Reference 6) is provided which references the responses. The responses are based on information and analyses that have been completed as of the date of full compliance. As such, Entergy considers these items complete pending NRC closure. [Note: the references in the text above refer to references in the notification letter.]*

Therefore, this Six Month Status Report addresses only those open items associated with IPEC Unit 2.

## **2 Milestone Accomplishments**

The following milestone(s) have been completed since January 31, 2015, and are current as of July 31, 2015:

- Fourth Six-Month Status Report - February 2015
- Notification of Full Compliance for IPEC Unit 3 – May 2015
- Fifth Six Month Status Report – Complete with submission of this document in August 2015

## **3 Milestone Schedule Status**

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. The milestone listing includes only IPEC Unit 2.

These new milestone target completion dates do not impact the Order implementation date.

<b>Milestone</b>	<b>Target Completion Date*</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
<b>Submit Overall Integrated Implementation Plan</b>	Feb 2013	Complete	
<b>Submit Six Month Updates</b>			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Complete	
Update 3	Aug 2014	Complete	
Update 4	Feb 2015	Complete	
Update 5	Aug 2015	Complete	
Update 6	Feb 2016	Not Started	
Update 7	Aug 2016	Not Started	
<b>Perform Staffing Analysis</b>	Nov 2014	Complete	
<b>Off-site FLEX Equipment</b>			
Develop Strategies with NSRC	Oct 2015	Started	
<b>Procedures</b>			
PWROG issues NSSS-specific guidelines	Jan 2014	Complete Issued May 2013	
<b>Modifications</b>			
Engineering and Implementation			
N-1 Walkdown (Unit 2)	Spring 2014	Completed	
Design Engineering	June 2015	Completed	
Unit 2 Implementation Outage	Apr 2016	Not Started	
<b>Validation / Demonstration</b>	Oct 2015	Not Started	Yes
<b>On-site FLEX Equipment</b>			
Purchase / Procure	Dec 2015	Started	
<b>Procedures</b>			
Create Indian Point FSG	April 2016	Started	Yes
Create Maintenance Procedures	Oct 2015	Started	
<b>Training:</b>			
Develop Training Plan	Aug 2015	Complete	
Implement Training	April 2016	Not Started	
<b>Submit Completion Report IPEC Unit 2</b>	June 2016	Not Started	

\* - Target Completion Date is the last submitted date from either the overall integrated plan or previous six-month status reports

#### **4 Changes to Compliance Method**

In the continuing design development phase of the FLEX project at IPEC, changes have been identified to the compliance strategies as described in the original OIP (Reference 1) and in previous correspondence (References 3, 5, 6 and 8).

- Lighting panels are not credited based on not being evaluated robust for a seismic event. Lighting during Phase 1 is limited to the 8 hour battery backed emergency lights and portable flashlights and lanterns. For Phase 2, lighting can be provided by portable, diesel powered lighting towers. For the Central Control Room (CCR), flashlights stored in the CCR and portable lighting stored in the FLEX Equipment Storage Building are the credited lighting for the CCR.
- For IPEC Unit 2, if the CST and instrument air are unavailable following the BDBEE (missile event), operation of PCV-1188 (City Water Storage Tank (CWST) to suction of the Turbine Driven Auxiliary Boiler Feedwater Pump (TDABFP)) from the Central Control Room is maintained by installed nitrogen backup and an alternate power supply until a manual blocking device is installed to maintain PCV-1188 open to align the CWST to the suction of the TDABFP. Based on nitrogen usage for valve operation, sufficient nitrogen is available to maintain PCV-1188 open for several hours. Conservatively, the manual blocking device is installed within 2 hours, eliminating a need for a subsequent nitrogen supply to maintain the CWST available to the suction of the TDABFP.
- On Page 44 of the OIP, it is stated, "Additional equipment may be required to be powered during this event such as portable lighting and ventilation fans. These are not conveniently powered via the FLEX generator." For IPEC Unit 2 the CCR HVAC system is not credited but it is expected to survive the extreme high temperature BDBEE, therefore for this case, ventilation to the CCR can be restore via the Phase 2 FLEX generator.

#### **5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

IPEC expects to comply with the order implementation date for IPEC Unit 2. IPEC Unit 3 is already in compliance with Order EA-12-049 (Reference 9).

#### **6 Open Items from Overall Integrated Plan and Interim Staff Evaluation**

For IPEC Unit 3, the following list of 12 open items, included in the NRC Report for the Onsite Visit (Reference 7), were addressed in the Notification of Full Compliance (Reference 9), Attachment 1.

1. ISE CI 3.2.3.A
2. ISE CI 3.2.4.2.A
3. ISE CI 3.2.4.3.A
4. AQ - 27

- 5. AQ - 28
- 6. AQ - 46
- 7. AQ - 51
- 8. SE #2
- 9. SE #5
- 10. SE #7
- 11. SE #13
- 12. SE #14

The following tables provide a summary and status of any open items documented in the Overall Integrated Plan and any open items or confirmatory items documented in the Interim Staff Evaluation (ISE) for IPEC Unit 2. A fourth table includes a listing of all Audit Questions and the status of each item applicable specifically to IPEC Unit 2. This table also includes a list of the Combined SE Template Technical Review Gaps (Audit Item SE #) and the status of each item applicable to IPEC Unit 2.

Overall Integrated Plan Open Item	Status
There were no open items documented in the IPEC Overall Integrated Plan	N/A

Interim Staff Evaluation Open Items		IPEC Unit 2 Status
3.1.2.A	Review of the licensee's new flooding level evaluation results and its potential impact on the flooding hazard analyses previously provided in their Integrated Plan and during the audit process is identified as an Open Item. If the flooding levels are modified based on the results of this review, it may affect the evaluation of the deployment described in Section 3.1.2.2 of this evaluation.	This item is addressed by AQ IPEC-006 response.
3.2.4.7.A	It is noted that NEI 12-06 guidance only credits water supplies that are robust with respect to seismic events, floods, and high winds, and the associated missiles. The licensee should determine if a water supply for the SGs and RCS would be available after a tornado event by analyzing the tornado characteristics for the site compared to the separation characteristics of the tanks. This is an alternate approach from the strategies identified in NEI 12-06.	This item is addressed by AQ IPEC-041 response.

Interim Staff Evaluation Confirmatory Items	IPEC Unit 2 Status
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Interim Staff Evaluation Confirmatory Items		IPEC Unit 2 Status
3.1.1.2.A	Confirm that at least one connection point for the FLEX AFW pump is accessible and is located inside a building that is seismically robust as described in Consideration 2 of NEI 12-06, Section 5.3.2.	This item was closed during the October 2014 NRC Audit Visit (associated with AQ IPEC-002 and IPEC-036).
3.1.1.2.B	Confirm that the pickup trucks, forklifts or any other equipment that will be used to deploy the portable equipment for implementing FLEX strategies will be reasonably protected from the event as described in Consideration 5 of NEI 12-06, Section 5.3.2.	This item was closed during the October 2014 NRC Audit Visit.
3.1.1.2.C	Confirm provisions will be made to ensure that access to all required areas will be assured in the event of a power failure as described in Consideration 5 of NEI 12-06, Section 5.3.2.	This item is addressed by updated AQ IPEC-023 response.
3.1.1.2.D	Confirm that the licensee has reviewed the deployment paths from the near site storage areas to the site and from the onsite storage areas to the deployment location to verify that these paths are not subject to soil liquefaction concerns as described in Consideration 1 of NEI 12-06, Section 5.3.2.	This item was closed during the October 2014 NRC Audit Visit (associated with AQ IPEC-002).
3.1.1.3.A	Confirm that the licensee's review of the potential impacts of large internal flooding sources that are not seismically robust and do not require ac power has been completed per consideration 2 of NEI 12-06, Section 5.3.3.	This item is addressed by AQ IPEC-004 response.
3.1.1.4.A	Confirm that the intermediate staging area has been selected and implementing procedures have been developed.	This item was closed during the October 2014 NRC Audit Visit (associated with AQ IPEC-005).
3.1.2.2.A	Confirm that evaluations address: whether procedures have been established for actions to be taken upon receipt of a hurricane warning; ensuring that fuel in oil storage tanks would not be inundated or damaged by flooding; and, whether the means (e.g., trucks) for moving FLEX equipment is reasonably protected from the event.	This item is addressed by AQ IPEC-006 response.
3.2.1.A	Confirm which analysis performed in WCAP-17601-P is being applied to Indian Point. Also	This item was closed following the October

	<b>Interim Staff Evaluation Confirmatory Items</b>	<b>IPEC Unit 2 Status</b>
	confirm the licensee has adequately justified the use of that analysis by identifying and evaluating the important parameters and assumptions demonstrating that they are representative of Indian Point and appropriate for simulating the ELAP transient.	2014 NRC Audit Visit as documented in Reference 7 (associated with AQ IPEC-012).
3.2.1.1.A	Confirm that the licensee is using NOTRUMP and has taken into account its limitations. Reliance on the NOTRUMP code for the ELAP analysis of Westinghouse plants is limited to the flow conditions prior to reflux condensation initiation. This includes specifying an acceptable definition for reflux condensation cooling.	This item was closed following the October 2014 NRC Audit Visit as documented in Reference 7 (associated with AQ IPEC-012).
3.2.1.3.A	Confirm that the licensee has satisfactorily addressed the applicability of Assumption 4 on page 4-13 of WCAP-17601 which states that decay heat is per ANS 5.1-1979 + 2 sigma, or equivalent. If the ANS 5.1-1979 + 2 sigma model is used in the Indian Point ELAP analysis, address the adequacy of the use of the decay heat model in terms of the plant-specific values of the following key parameters: ( 1) initial power level, (2) fuel enrichment, (3) fuel burnup, (4) effective full power operating days per fuel cycle, (5) number of fuel cycles, if hybrid fuels are used in the core, and (6) fuel characteristics (addressing whether they are based on the beginning of the cycle, middle of the cycle, or end of the cycle). If a different decay heat model is used, describe the specific model and address the adequacy of the model and the analytical results.	This item is addressed by AQ IPEC-013 response.
3.2.1.6.A	Confirm that the licensee has finalized its strategy for controlling the RCS pressure to prevent nitrogen from escaping from the safety injection accumulators into the RCS until the isolation valves can be closed.	This item is addressed by AQ IPEC-035 response.
3.2.1.8.A	The PWROG submitted to NRC a position paper, dated August 15, 2013, which provides test data regarding boric acid mixing under single-phase natural circulation conditions and outlined applicability conditions intended to ensure that boric acid addition and mixing would occur under conditions similar to those for which boric acid mixing data is available. During the	This item is addressed by updated AQ IPEC-050 response.

<b>Interim Staff Evaluation Confirmatory Items</b>		<b>IPEC Unit 2 Status</b>
	audit process, the licensee informed the NRC staff of its intent to abide by the generic approach discussed above. The licensee should address the clarifications in the NRC endorsement letter dated January 8, 2014.	
3.2.1.9.A	Confirm that the licensee has specified the required time for the operator to realign each of the above discussed pumps and confirm that the required times are consistent with the results of the ELAP analysis. Confirm that the licensee discussed the analyses that are used to determine the required flow rate and corresponding total developed head for each of the portable pumps and also to justify that the required capacities of each of the above-discussed portable pumps are adequate to maintain core cooling and sub-criticality during phases 2 and 3 of ELAP. Confirm that the licensee has included a discussion and justification of computer codes/methods and assumptions used in the analyses above.	This item is addressed by updated AQ IPEC-017 response.
3.2.1.9.B	Confirm that the licensee has provided an evaluation that demonstrates flow through a 2-inch connection will be sufficient to provide adequate flow to maintain the SG level using the alternate SG FLEX pump.	This item is addressed by AQ IPEC-036 response.
3.2.2.A	Confirm that the licensee has satisfactorily explained the strategy to provide a secondary connection for SFP makeup if the building is inaccessible, and explain where these valves are and if access to these valves will be available during an ELAP event.	This item is addressed by AQ IPEC-034 response.
3.2.3.A	Confirm that a containment evaluation has been completed and, based on the results of this evaluation; required actions to ensure maintenance of containment integrity and required instrument function will be developed.	This item is addressed by updated AQ response spreadsheet on the ePortal.
3.2.4.2.A	Confirm that the assessment of the predicted maximum temperatures in rooms with equipment that is required for FLEX strategies during the ELAP demonstrates that the equipment will continue to function as needed.	This item is addressed by updated AQ IPEC-020 response.
3.2.4.2.B	Confirm that hydrogen concentration in the	This item is addressed by

<b>Interim Staff Evaluation Confirmatory Items</b>		<b>IPEC Unit 2 Status</b>
	battery rooms during battery recharging would be maintained at an acceptable level.	updated AQ IPEC-047 response.
3.2.4.3.A	Confirm that the need for heat tracing has been evaluated for the BAST and all other equipment necessary to ensure that all FLEX strategies can be implemented successfully.	This item is addressed by updated AQ IPEC-021 response.
3.2.4.6.A	Confirm that habitability limits will be maintained and/or operator protective measures will be employed in all Phases of an ELAP to ensure operators will be capable of FLEX strategy execution under adverse temperature conditions. Examples of areas of concern are the control room, TDABFW pump room, SFP area, and charging pump room.	This item is addressed by updated AQ IPEC-020 response.
3.2.4.7.B	Confirm that the licensee has evaluated the acceptability of the missile protection for the Unit 2 BAST.	This item was closed during the October 2014 NRC Audit Visit (associated with AQ IPEC-041).
3.2.4.9.A	Confirm that method for supplying fuel oil has been finalized. Also confirm that the fuel required for each FLEX piece of equipment has been established and that the total fuel usage has been calculated to demonstrate that sufficient fuel with margin exists on site.	This item is addressed by updated AQ IPEC-025 response.
3.2.4.10.A	Confirm that analysis of the following aspects of the dc power requirements have been identified and evaluated: <ul style="list-style-type: none"> <li>a. The dc load profile with the required loads for the mitigating strategies to maintain core cooling, containment, and spent fuel pool cooling;</li> <li>b. The loads that will be shed from the dc bus, the equipment location (or location where the required action needs to be taken), and the required operator actions and the time to complete each action</li> <li>c. The basis for the minimum dc bus voltage that is required to ensure proper operation of all required electrical equipment.</li> </ul>	This item is addressed by updated AQ IPEC-026 response.
3.4.A	Confirm that the 480V portable/FLEX generators are adequately sized to supply loads assumed for implementing Phase 2 strategies.	This item is addressed by AQ IPEC-031 response.

Audit Questions	IPEC Unit 2 Status	Completion or Target Date
IPEC-002	This item was closed during the October 2014 NRC Audit Visit (associated with ISE Confirmatory Item 3.1.1.2.D)	Closed
IPEC-003	Response available on the ePortal.	Review ready
IPEC-004	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.1.1.3.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-005	This item was closed during the October 2014 NRC Audit Visit (associated with ISE Confirmatory Item 3.1.1.4.A)	Closed
IPEC-006	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Open Item 3.1.2.A.. The preceding table provides the status to this ISE Open Item.	Closed
IPEC-008	Response available on the ePortal.	Review ready
IPEC-009	This item was closed during the October 2014 NRC Audit Visit.	Closed
IPEC-010	Response available on the ePortal.	Review ready
IPEC-011	Response available on the ePortal	Review ready
IPEC-012	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.1.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-013	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.1.3.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-014	This item was closed during the October 2014 NRC Audit Visit.	Closed
IPEC-017	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.1.9.A. The preceding table provides the status of these ISE Confirmatory Item.	Review ready

Audit Questions	IPEC Unit 2 Status	Completion or Target Date
IPEC-020	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.6.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-021	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.3.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-022	Response available on the ePortal.	Review ready
IPEC-023	Updated Response available on the ePortal.	Review ready
IPEC-025	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.9.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-026	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.10.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-027	Response available on the ePortal.	Review ready
IPEC-028	Updated response available on the ePortal.	Review ready
IPEC-029	Updated response available on the ePortal	Review ready
IPEC-031	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.4. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-032	Response available on the ePortal	Review ready
IPEC-033	Updated response available on the ePortal	Review ready
IPEC-034	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.2.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-035	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.1.6.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-036	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.1.9.B. The preceding table provides the status to	Closed

Audit Questions	IPEC Unit 2 Status	Completion or Target Date
	this ISE Confirmatory Item.	
IPEC-037	This item was closed during the October 2014 NRC Audit Visit.	Closed
IPEC-041	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Open Item 3.2.4.7.A. The preceding table provides the status to this ISE Open Item.	Closed
IPEC-042	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.3.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-043	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.3.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-045	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.2.A. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-046	Response available on the ePortal	Review ready
IPEC-047	This item was closed during the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item 3.2.4.2.B. The preceding table provides the status to this ISE Confirmatory Item.	Closed
IPEC-048	Response available on the ePortal	Review ready
IPEC-049a	Response available on the ePortal.	Review ready
IPEC-049b	Response available on the ePortal.	Review ready
IPEC-049c	Response available on the ePortal.	Review ready
IPEC-049d	Response available on the ePortal.	Review ready
IPEC-049e	Response available on the ePortal.	Review ready
IPEC-049f	Response available on the ePortal.	Review ready
IPEC-049g	Response available on the ePortal.	Review ready
IPEC-049h	Response available on the ePortal.	Review ready
IPEC-049i	Response available on the ePortal.	Review ready
IPEC-050	This item was closed following the October 2014 NRC Audit Visit to its associated ISE Confirmatory Item	Closed

Audit Questions	IPEC Unit 2 Status	Completion or Target Date
	3.2.1.8.A. The preceding table provides the status to this ISE Confirmatory Item.	
IPEC-051	Updated response available on the ePortal	Review ready
SE #1	Updated response available on the ePortal.	Review ready
SE #2	Response available on the ePortal.	Review ready
SE #4	Response available on the ePortal.	Review ready
SE #5	Response available on the ePortal.	Review ready
SE #6	Response available on the ePortal.	Review ready
SE #7	Updated response available on the ePortal.	Review ready
SE #8	Response available on the ePortal.	Review ready
SE #9	Response available on the ePortal.	Review ready
SE #10	Response available on the ePortal.	Review ready
SE #11	Response available on the ePortal.	Review ready
SE #12	Response available on the ePortal.	Review ready
SE #13	Response available on the ePortal.	Review ready
SE #14	Response available on the ePortal.	Review ready
SE #15	Response available on the ePortal.	Review ready
SE #16	Response available on the ePortal.	Review ready
SE #17	Response available on the ePortal.	Review ready

## 7 Potential Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

## 8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Entergy letter to NRC (NL-13-042), Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013



2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.
3. Entergy letter to NRC (NL-13-110), Indian Point Energy Center's First Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated August 27, 2013
4. NRC letter to Entergy, Indian Point Nuclear Generating Unit Nos. 2 and 3 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC Nos. MF0744 and MF0745), dated January 24, 2014
5. Entergy letter to NRC (NL-14-031), Indian Point Energy Center's Second Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated February 27, 2014 (ML14070A365)
6. Entergy letter to NRC (NL-14-110), Indian Point Energy Center's Third Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated August 27, 2014 (ML14251A227).
7. Indian Point Nuclear Generating Unit Nos. 2 and 3 – Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Instrumentation Related to Orders EA 12-049 and EA 12-051 (TAC Nos. MF0744, MF0745, MF0737 and MF0738), dated December 9, 2014 (ML14335A642)
8. Entergy letter to NRC (NL-15-025), Indian Point Energy Center's Fourth Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745), dated February 26, 2015 (ML15069A028).
9. Entergy letter to NRC (NL-15-059), Notification of Full Compliance with Order EA-12-049 "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" and Order EA-12-051 "Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation" (TAC Nos. MF0745 and MF0738) Indian Point Unit Number 3, dated May 20, 2015 (ML15149A140).