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**Lawrence Coyle**  
Site Vice President

NL-15-111

August 28, 2015

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike, OWFN-2FL  
Rockville, MD 20852-2738

**SUBJECT:** Indian Point Energy Center's Fifth Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation (TAC No. MF0737)  
Indian Point Unit Number 2  
Docket No. 50-247  
License No. DPR-26

- References:**
1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012 (ML12054A682)
  2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012
  3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation", Revision 1, dated August 2012
  4. Entergy letter to NRC (NL-12-145), Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 29, 2012
  5. Entergy letter to NRC (NL-13-043), Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated February 27, 2013

ADD  
NRR

6. Entergy letter to NRC (NL-13-109), Indian Point Energy Center's First Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0737 and MF0738), dated August 27, 2013
7. Entergy letter to NRC (NL-14-029), Indian Point Energy Center's Second Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0737 and MF0738), dated February 27, 2014
8. Entergy letter to NRC (NL-14-109), Indian Point Energy Center's Third Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0737 and MF0738), dated August 27, 2014
9. Entergy letter to NRC (NL-15-026), Indian Point Energy Center's Fourth Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0737 and MF0738), dated February 27, 2015
- 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", dated May 20, 2015

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 install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

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 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Entergy initial status report regarding spent fuel pool instrumentation. 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. 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 (Reference 9), including any changes to the compliance method, schedule, or need for relief and the basis, if any. The report applies only to IPEC Unit 2, because Unit 3 compliance with Order EA-12-049 was achieved in May 2015, as documented in Reference 10. Updates for Unit 3 are therefore no longer required.

There are no new commitments identified in this submittal. If you have any questions concerning the content of this letter, 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 ~~27~~, 2015.

Sincerely,



LC/sp

Attachment: Indian Point Energy Center's Fifth Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation

cc: Mr. Douglas V. 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  
Ms. Jessica A. Kratchman NRC NSIR DPR DDEP IRIB

ATTACHMENT TO NL-15-111

ENTERGY'S FIFTH SIX-MONTH  
STATUS REPORT FOR THE  
IMPLEMENTATION OF ORDER EA-12-051 MODIFYING LICENSES  
WITH REGARD TO REQUIREMENTS FOR RELIABLE SPENT  
FUEL POOL INSTRUMENTATION

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

## Indian Point Energy Center's (IPEC) Fifth Six Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation

### 1. Introduction

Entergy Nuclear Operations, Inc. (Entergy) developed an Overall Integrated Plan (Reference 1) for Indian Point Energy Center (IPEC), documenting the requirements to install reliable spent fuel pool level instrumentation (SFPI), in response to Reference 2. This attachment provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any. This update pertains only to IPEC Unit 2 because IPEC Unit 3 is considered in compliance with NRC Order EA-12-051 as of May 20<sup>th</sup>, 2015 (Reference 10).

### 2. Milestone Accomplishments

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

None.

### 3. Milestone Schedule Status

The following provides a line item update to milestone schedule to support 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 because IPEC Unit 3 is considered in compliance with NRC Order EA-12-051 as of May 20<sup>th</sup>, 2015 (Reference 10).

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Unit 2 Reliable SFPI Installed	Spring 2016 Refueling Outage	In Progress	N/A
Respond to NRC RAIs (Received June 25, 2013) (Reference 3)	August 23, 2013	Complete	N/A
Respond to ISE RAIs dated November 8, 2013 (Reference 4)	September 30, 2014	Complete	N/A

**4. Changes to Compliance Method**

There are no additional changes to the compliance method.

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

IPEC expects to comply with the Order implementation date and no relief/relaxation is required at this time.

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

IPEC has received an Interim Staff Evaluation (Reference 4) that includes 15 RAIs. There were 3 additional RAIs received prior to the October 2014 NRC Audit Visit (Reference 6), for a total of 18 RAIs. The following table provides the status of these 18 RAIs. This listing includes only IPEC Unit 2 because IPEC Unit 3 is considered in compliance with NRC Order EA-12-051 as of May 20<sup>th</sup>, 2015 (Reference 10).

<b>RAI #</b>	<b>IP2 Response Status</b>
1	Submitted in Reference 7
2	Uploaded to e-portal September 30, 2014
3	Uploaded to e-portal September 30, 2014
4	Uploaded to e-portal September 30, 2014
5	Uploaded to e-portal September 30, 2014
6a	Uploaded to e-portal September 30, 2014
6b	Uploaded to e-portal September 30, 2014
6c	Uploaded to e-portal September 30, 2014
7	Uploaded to e-portal September 30, 2014
8	Uploaded to e-portal September 30, 2014
9	Uploaded to e-portal September 30, 2014
10	Uploaded to e-portal September 30, 2014
11	Submitted in Reference 7
12	Submitted in Reference 7
13	Uploaded to e-portal September 30, 2014
14	Submitted in Reference 9
15a	Submitted in Reference 7
15b	Submitted in Reference 7
16	Submitted in Reference 9
17	Submitted in Reference 9
18a	Submitted in Reference 9
18b	Submitted in Reference 9
18c	Submitted in Reference 9

## 7. Potential Interim Staff Evaluation Impacts

There are no additional 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 attachment.

1. Entergy letter to NRC (NL-13-043), "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated February 27, 2013 (ADAMS Accession No. ML13072A082).
2. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ADAMS Accession No. ML12054A682).
3. "Request for Additional Information Overall Integrated Plan in Response to Order EA-12-051, 'Reliable Spent Fuel Pool Instrumentation' Entergy Operations, Order No. EA-12-051 (TAC Nos. MF0737 and MF0738)," dated June 25, 2013 (ADAMS Accession No. ML13169A127).
4. "Indian Point Nuclear Generating Unit Nos. 2 and 3 – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0737 and MF0738)," dated November 8, 2013 (ADAMS Accession No. ML13298A805).
5. "Summary of the November 26, 2013, Public Meeting to Discuss Industry Responses to Staff Interim Evaluations for Spent Fuel Pool Instrumentation," dated December 26, 2013 (ADAMS Accession No. ML13347B030).
6. "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 EAI-12-051 (TAC NOS. MF0744, MF0745, MF0737, AND MF0738)", dated December 9, 2014 (ADAMS Accession No. ML14335A642)
7. Entergy letter to NRC (NL-14-109), Indian Point Energy Center's Third Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0737 and MF0738), dated August 27, 2014
8. Donald C. Cook Nuclear Plant, Units 1 and 2 - Report for the Onsite Audit of MOHR Regarding Implementation of Reliable Spent Fuel Pool Instrumentation Related to Order EA-12-051 (TAC NOS. MF0761 and MF0762) dated August 27, 2014 (ADAMS Accession No. ML14216A362)
9. Entergy letter to NRC (NL-15-026), Indian Point Energy Center's Fourth Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for to Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0737 and MF0738), dated February 27, 2015 (ADAMS Accession No. ML15065A123)

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", dated May 20, 2015 (ADAMS Accession No. ML15149A140)