

In the Matter of:

Entergy Nuclear Operations, Inc.  
(Indian Point Nuclear Generating Units 2 and 3)

NYS000553

Submitted: June 9, 2015



ASLBP #: 07-858-03-LR-BD01  
 Docket #: 05000247 | 05000286  
 Exhibit #: NYS000553-00-BD01  
 Admitted: 11/5/2015  
 Rejected:  
 Other:

Identified: 11/5/2015  
 Withdrawn:  
 Stricken:

## COMMITMENT CLOSURE VERIFICATION FORM

## Sheet 1 of 2

LRS/CMS I.D.	IP2- A- 10378	Source /Parent Document	NL-11-032, NL-11-074, NL- 11-090, NL-11-096
	IP3- A- 10379		
LO-LAR-2011-0174 CA	IP2-60	LRC #	42
	IP3-61		

Commitment Summary Restate or paraphrase the commitment

IPEC will develop a plan for each unit to address the potential for cracking of the primary to secondary pressure boundary due to PWSCC of tube-to tubesheet welds using one of the following two options.

## Option 1 (Analysis)

IPEC will perform an analytical evaluation of the steam generator tube-to-tubesheet welds in order to establish a technical basis for either determining that the tubesheet cladding and welds are not susceptible to PWSCC, or redefining the pressure boundary in which the tube-to-tubesheet weld is no longer included and, therefore, is not required for reactor coolant pressure boundary function. The redefinition of the reactor coolant pressure boundary must be approved by the NRC as a license amendment request.

## Option 2 (Inspection)

IPEC will perform a one-time inspection of a representative number of tube-to-tubesheet welds in each steam generator to determine if PWSCC cracking is present. If weld cracking is identified:

- The condition will be resolved through repair or engineering evaluation to justify continued service, as appropriate, and
- An ongoing monitoring program will be established to perform routine tube-to tubesheet weld inspections for the remaining life of the steam generators.

Extent of Closure Full ☒ IP2 and IP3 Partial ☐

Means of Closure List the closure documents (e.g., letter, procedure, etc.) from which objective evidence of commitment closure can be obtained.<sup>1</sup>

LO-LAR-2011-00174 CA 60 for IP2 is being used to track commitment 42.  
 LO-LAR-2011-00174 CA 61 for IP3 is being used to track commitment 42.

Note 1: Objective evidence from the listed closure documentation must be attached or reference provided regarding where the documentation may be retrieved.

EN-LI-110-Att-9.2, Rev. 5

IPEC00277167

COMMITMENT CLOSURE VERIFICATION FORM

Sheet 2 of 2

Robert J. Dolansky  
Site Program Owner

4/24/2013  
Date

Steve John Cunningham  
Site License Renewal Project Manager

4/25/2013  
Date

Site Licensing

The objective evidence supports the Extent of Closure indicated above AND the commitment tracking system has been updated.

CLOSURE DATE for IP2 is 2/29/2024

CLOSURE DATE for IP3 is 4/15/2017

Site Licensing Signature

John Cunningham

4/25/2013  
Date

CLOSURE -

Indian Point 2 - Technical Specification Commitment # 277 was issued by NRC on 9/15/14; see response to LR-LAR-2011-00174, CABO provided by R. Dolansky on 9/17/14. Also RA-14-130.

John Cunningham 10/15/14

The objective evidence supports the Extent of Closure for IP2 only AND the commitment tracking system has been updated

John Cunningham 10/15/14

**CA Number:** 60

	Site	Group	Name
<b>Assigned By:</b>	IP2	Projects Site Staff IP2	Caputo, Charles M
<b>Assigned To:</b>	IP2	Eng Code Programs Staff IP2	Dolansky,Robert J

**Subassigned To :**

**Originated By:** Caputo, Charles M 8/23/2011 21:52:53

**Performed By:** Dolansky,Robert J 9/17/2014 09:11:06

**Subperformed By:**

**Approved By:**

**Closed By:**

**Current Due Date:** 02/29/2024

**Initial Due Date:** 02/29/2024

**CA Type:** NRC COMMITMENT

**CA Priority:**

**Plant Constraint:** OTHER

**CA Description:**

NRC Commitment # 42

IPEC will develop a plan for each unit to address the potential for cracking of the primary to secondary pressure boundary due to PWSCC of tube-to-tubesheet welds using one of the following two options.

Option 1 (Analysis)

IPEC will perform an analytical evaluation of the steam generator tube-to-tubesheet welds in order to establish a technical basis for either determining that the tubesheet cladding and welds are not susceptible to PWSCC, or redefining the pressure boundary in which the tube-to-tubesheet weld is no longer included and, therefore, is not required for reactor coolant pressure boundary function. The redefinition of the reactor coolant pressure boundary must be approved by the NRC as a license amendment request.

Option 2 (Inspection)

IPEC will perform a one-time inspection of a representative number of tube-to-tubesheet welds in each steam generator to determine if PWSCC cracking is present. If weld cracking is identified:

- The condition will be resolved through repair or engineering evaluation to justify continued service, as appropriate, and
- An ongoing monitoring program will be established to perform routine tube-to-tubesheet weld inspections for the remaining life of the steam generators.

**Response:**

NRC Commitment 42 is complete for IP2.

IP2 has developed an alternate repair criteria for the steam generators, called H\*, which has redefined the pressure boundary in which the tube-to-tubesheet weld is no longer included and, therefore, is not required for reactor coolant pressure boundary function. The application of H\* was approved by the NRC as Technical Specification Amendment 277 which was issued by the NRC on September 5, 2014.

**Subresponse :**

**Closure Comments:**