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February 29, 2016

Lawrence G. McDade, Chairman
Dr. Michael F. Kennedy
Dr. Richard E. Wardwell
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket: ***Entergy Nuclear Operations, Inc. (Indian Point Nuclear Generating Units 2 and 3), Docket Nos. 50-247-LR and 50-286-LR***

Re: **Board Notification of Corrections to Certain WCAP Reports**

Dear Administrative Judges:

On February 19, 2016, the Atomic Safety and Licensing Board ("Board") issued an order addressing the State of New York's ("NYS" or "the State") motion to file six new exhibits on the record for the Track 2 contentions in this proceeding, and directing the filing of additional expert testimony on those exhibits from NYS, the NRC Staff, and Entergy Nuclear Operations, Inc. ("Entergy").¹

In accordance with its obligation to inform the Board of relevant developments in a timely fashion,² Entergy is providing this notification of the recent identification of an error in two of

¹ See Licensing Board Order (Requesting Expert Testimony on New York's Proposed Exhibits and Suspending Deadline for Filing Proposed Findings of Fact) (Feb. 19, 2016).

² See *Duke Power Co.* (William B. McGuire Nuclear Station, Units 1 & 2), ALAB-143, 6 AEC 623, 625 (1973); *Metro. Edison Co.* (Three Mile Island Nuclear Station, Unit 1), ALAB-774, 19 NRC 1350, 1359 (1984).

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the State's proposed exhibits: WCAP-17949-P and WCAP-17951-P ("the WCAP Reports"), which provide flaw size acceptance criteria for several core barrel welds at Indian Point Nuclear Generating Units 2 and 3 ("IP2" and "IP3," or collectively "IPEC"), respectively.³

Specifically, Westinghouse has determined that the WCAP Reports provide incorrect calculations of applied stresses on the core barrel welds. These applied stresses are inputs into the acceptable flaw size criteria to be used in the event that flaws are discovered in the core barrel welds during the upcoming inspections at IP2, or in the future at IP3. At this point Westinghouse has not determined whether the corrected calculations will show increased or decreased acceptable flaw sizes in all cases, but preliminarily it believes that the acceptable flaw sizes for some welds may be increased and others decreased. Westinghouse is in the process of revising these reports and expects to have revisions completed within one week. Entergy will inform the Board and the parties as soon as the revised WCAP Reports are finalized.

While Entergy does not believe that these corrections should have any material impact on the claims made in the State's motion regarding these documents,⁴ Entergy is nevertheless providing this Notification to the Board out of an abundance of caution given the relevance of

³ WCAP-17949-P, Rev. 0, "Background and Technical Basis Supporting Engineering Flaw Acceptance Criteria for Indian Point Unit 2 Reactor Vessel Internals MRP-227-A Primary and Expansion Components" (Jan. 12, 2016) ("WCAP-17949-P, Rev. 0") (proposed NYS000584); WCAP-17951-P, Rev. 0, "Background and Technical Basis Supporting Engineering Flaw Acceptance Criteria for Indian Point Unit 3 Reactor Vessel Internals MRP-227-A Primary and Expansion Components" (Jan. 12, 2016) ("WCAP-17951-P, Rev. 0") (proposed NYS000585).

⁴ NYS claims that the Eason Paper provides new crack growth disposition curves which show that the crack growth rates used in the WCAP Reports result in "flaw acceptance criteria and associated 10-year inspection intervals . . . [that] may be decidedly non-conservative." New York State's Motion for Leave to File Six Documents as Additional Exhibits at 4-5 (Feb. 5, 2016) (citing E. Eason & R. Pathania, "Disposition Curves for Irradiation-Assisted Stress Corrosion Cracking of Austenitic Stainless Steels in Light Water Reactor Environments" (ASME PVP2015-45223) (July 19-23, 2015) (proposed NYS000587)); *see also id.* at 6. The applied stress calculations and the selection of crack growth disposition curves, however, are separate parts of the acceptable flaw size determination.

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the WCAP Reports to the State's supplemental testimony due to be filed this week. Entergy has also separately informed the NRC Staff and the State of this Notification.

Respectfully submitted,

Executed in accord with 10 C.F.R. § 2.304(d)

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**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of))	Docket Nos. 50-247-LR and
))	50-286-LR
ENTERGY NUCLEAR OPERATIONS, INC.))	
(Indian Point Nuclear Generating Units 2 and 3)))	February 29, 2016

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 2.305 (as revised), I hereby certify that, on this date, copies of Entergy’s “Board Notification of Corrections to Certain WCAP Reports” were served upon the Electronic Information Exchange (the NRC’s E-Filing System), in the above-captioned proceeding.

Signed (electronically) by Raphael P. Kuyler

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