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NL-16-101

September 6, 2016

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**SUBJECT:** Supplement to Request for Relief Request IP2-ISI-RR-01 Examination of Upper Pressurizer Welds  
Indian Point Unit Number 2  
Docket No. 50-247  
License No. DPR-26

**REFERENCE:** 1. Entergy Letter NL-15-138 to NRC Regarding Request for Relief Request IP2-ISI-RR-01 Examination of Upper Pressurizer Welds, dated October 29, 2015

Dear Sir or Madam:

The purpose of this letter is to supplement Reference 1. Entergy Nuclear Operations, Inc. (Entergy) requested, in Reference 1, relief to use an alternative to the 2007 edition with the 2008 Addenda of ASME Section XI requirements in Table IWB-2500-1 Category B-B, Notes 2 and Note 4. This relief request is for the Fifth 10-year Inservice Inspection (ISI) Interval and was made in accordance with 10 CFR 50.55a(g)(5)(iii) because of certainty the inspection cannot be made. The requirements of 10 CFR 50.55a(g)(5)(iii) are "Determinations of impracticality in accordance with this section must be based on the demonstrated limitations experienced when attempting to comply with the Code requirements during the inservice inspection interval for which the request is being submitted."

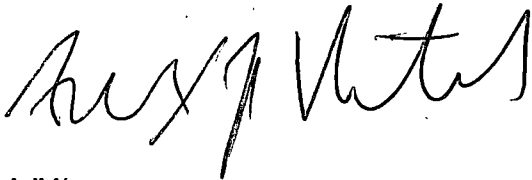
The Pressurizer Upper Shell-To-Head Circumferential (PZRC-5) and Longitudinal (PZRL-4) Welds are inaccessible because the welds are enclosed in a biological and missile shield wall and therefore they cannot be volumetrically inspected during the 5th interval using currently available technology as required by the ASME Section XI Code. Implementation of the ASME Section XI Code would result in a hardship since it would require the removal and the reinstallation of the pressurizer biological and missile shield wall. These same welds could not be volumetrically inspected during the fourth interval which ended on May 31, 2016 for the same

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reason. During the fourth interval, relief request RR-01 (ML072130487) was requested and was granted by the NRC on February 28, 2007, as an alternative to the requirements of the ASME Section XI Code. For the current (i.e. fifth) interval which started on June 1, 2016 the inaccessibility of the welds remains unchanged from the 4th interval since there have been no plant modifications affecting accessibility and therefore the inspections of the ASME Section XI Code cannot be implemented. Based on this inaccessibility, relief is being requested for the inspection of these two welds.

If you have any questions or require additional information, please contact Mr. Robert Walpole, Manager, Regulatory Assurance at (914) 254-6710.

Sincerely,

A handwritten signature in black ink, appearing to read "AJV/sp". The signature is written in a cursive, flowing style.

AJV/sp

cc: Mr. Douglas 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