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Anthony J. Vitale
Site Vice President

NL-17-109

August 17, 2017

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Request for Additional Information for Proposed License Amendment Regarding the Connection of Non-Seismic Boric Acid Recovery System to the Refueling Water Storage Tank Entergy Nuclear Operations, Inc. Indian Point Nuclear Generating, Unit No. 2 Docket No. 50-247

REFERENCE: Entergy Letter NL-17-035, "Proposed License Amendment Regarding Connection of Non-Seismic Boric Acid Recovery System to the Refueling Water Storage Tank" (April 07, 2017) (ML17104A040)

Dear Sir or Madam:

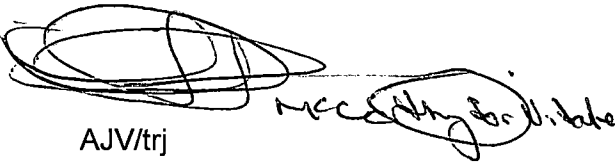
By letter dated April 7, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17104A039), Entergy Nuclear Operations, Inc. (Entergy), submitted a license amendment request (LAR) for Indian Point Nuclear Generating Unit No. 2 (IP2). The amendment would revise Technical Specifications (TS) 3.5.4, "Refueling Water Storage Tank (RWST)," to allow for the temporary connection between the non-seismically qualified piping of the Boric Acid Recovery System (BARS) to the seismically qualified piping of the RWST for a limited period for filtration until the end of the spring 2018 refueling outage (2R23).

Entergy understand the NRC staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific information requested and response is addressed in Attachment 1.

ADD
NRR

Entergy is making no commitments in this letter. Should you have any questions regarding this matter, please contact Mr. Robert Walpole, Manager, Regulatory Assurance, Indian Point Energy Center at (914) 254-6710.

Sincerely,



AJV/trj

cc: Mr. Daniel H. Dorman, Regional Administrator, NRC Region I
Mr. Sherwin E. Turk, NRC Office of General Counsel, Special Counsel
Mr. Richard V. Guzman, NRR Senior Project Manager
Ms. Bridget Frymire, New York State Department of Public Service
Ms. Alicia Burton, President and CEO NYSERDA
NRC Resident Inspector's Office

ATTACHMENT 1 TO NL-17-109

REQUEST FOR ADDITIONAL INFORMATION (RAI)
FOR PROPOSED LICENSE AMENDMENT
REGARDING THE CONNECTION OF NON-SEISMIC
BORIC ACID RECOVERY SYSTEM
TO THE REFUELING WATER STORAGE TANK

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

Request for Additional Information

According to the license amendment request, the non-seismic Boric Acid Recovery System (BARS) will be connected to valve 725 through a 2 inch adapter plate which is on the discharge of the refueling water purification pump (RWPP) and is part of the reactor water storage tank (RWST) piping to the Spent Fuel Pool (SFP) purification loop.

If any portion of the non-seismic BARS ruptured, is there a possibility of water inventory loss in the SFP? Please explain in detail.

Response to RAI

In event of a rupture of the non-seismic Boric Acid Recovery System (BARS) there is no possibility of draining water from the Spent Fuel Pool (SFP). Procedure 2-SOP-4.3.1 has plant operators close safety related manual valves 719A and 719B to isolate the SFP from the SFP demineralizer prior to aligning the RWST to the SFP demineralizer such as when the BARS is in service. Additionally, the protective tagout for installation of the BARS isolates the SFP from the BARS by closing safety related manual valves 705 and 709 and applying danger tags to those valves.

Closing valves 719A and 705 isolates the SFP system from the SFP demineralizer upstream of the branch line connection containing valve 725. Closing valves 719B and 709 isolates the SFP system from the SFP demineralizer downstream of the branch connection containing valve 725. This alignment not only serves to isolate the SFP from valve 725 and the non-seismic BARS, but also sets system alignment so that the water in the RWST is directed to the BARS and not to the SFP.