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NL-18-030

May 08, 2018

U.S. Nuclear Regulatory Commission
Document Control Desk
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Rockville, MD 20852-2738

SUBJECT: Supplemental Information Associated with Amendment 19 to the License
Renewal Application (LRA)
Indian Point Nuclear Generating Unit Nos. 2 and 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

REFERENCES: 1) Entergy Letter NL-17-157, "Amendment 19 to License Renewal
Application (LRA), Indian Point Nuclear Generating Unit Nos. 2 and 3"
(December 14, 2017) (ML17360A157)
2) Entergy Letter NL-12-123, "Correction to Previous Responses Regarding
Unit 1 Buried Piping and Unit 2 Auxiliary Feedwater Pump Room Fire
Event, Indian Point Nuclear Generating Units Nos. 1, 2 and 3"
(September 26, 2012) (ML12285A084)

Dear Sir or Madam:

In Reference 1, Entergy submitted Amendment 19 to the LRA that identified changes to the current licensing basis (CLB) of the facility that materially affected the contents of the LRA, including the FSAR supplement. By e-mail to IPEC licensing staff dated Thursday, April 5, 2018, NRC staff noted an apparent discrepancy regarding the status of a strainer in the IP2 city water system (CYW) that was the subject of the LRA revision in Amendment 19.

The attachment to this letter provides clarification of the strainer status. Associated changes to the LRA are also shown in the attachment.

There are no new commitments being made in this submittal.

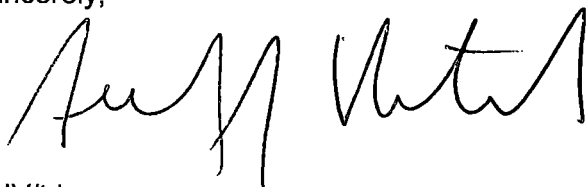
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If you have any questions or require additional information, please contact Mr. Robert Walpole at 914-254-6710.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

May 8, 2018.

Sincerely,



AJV/trj

Attachment: Clarification of Status of Strainer in IP2 City Water System (CYW) and Associated Changes to the License Renewal Application

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

ATTACHMENT TO NL-18-030

Clarification of Status of Strainer in IP2 City Water System (CYW) and
Associated Changes to the License Renewal Application

ENERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
DOCKET NOS. 50-247 AND 50-286

Issue for Clarification

In Reference 2, Entergy Letter dated September 26, 2012 (NL-12-123, Table 3.4.2-5-4-IP2 in Attachment 2 on pages 16 and 17), there are 3 rows that discuss copper alloy strainer housings. Amendment 19 (NL-17-157, dated December 14, 2017, Table 3.4.2-5-4-IP2) deleted 2 of the 3 line items. The 3rd line item remained, which indicated that the Selective Leaching Program will manage the effects of aging for copper alloy strainer housings exposed to treated water.

Because only 2 of the 3 rows for copper alloy strainer housings were deleted, the status of the strainers is not clear. Entergy is providing the following clarification.

Clarification

The third line item for copper alloy strainer housing in Table 3.4.2-5-4-IP2 should have also been deleted in letter NL-17-157.

The copper alloy strainer housing in the city water system was erroneously included in the system review of the auxiliary feedwater pump room fire event for the city water system (Table 3.4.2-5-4-IP2) and as a result should be removed. However, strainer ST-53, shown on LRA-9321-2729-0, location 3H, had previously been identified in the original review of the city water system, but had been inadvertently omitted from LRA Tables 2.3.3-17-IP2 and 3.3.2-17-IP2. The stainless steel strainer element in this copper alloy strainer housing is not subject to aging management review because flow through the strainer is not necessary to accomplish a license renewal intended function. The strainer housing only is credited for performing an intended function (pressure boundary) that supports a system intended function for license renewal.

Additional review of the material used for the strainer housing confirmed that it is copper alloy with less than 5 percent zinc. Therefore, selective leaching is not an aging effect requiring management.

There is no corresponding strainer among the city water system components of IP3 that are within the scope of license renewal and subject to aging management review.

LRA Tables 2.3.3-17-IP2 and 3.3.2-17-IP2, City Water System, are revised to add the line items for strainer ST-53. LRA Table 3.4.2-5-4-IP2, City Water System, Components Required to Support AFW Pump Room Fire Event, is revised to delete the remaining row for copper alloy strainer housing. Additions are underlined and deletions are lined through.

Table 2.3.3-17-IP2
City Water System
Components Subject to Aging Management Review

Component Type	Intended Function
<u>Strainer housing</u>	<u>Pressure boundary</u>

**Table 3.3.2-17-IP2
City Water
Summary of Aging Management Review**

Table 3.3.2-17-IP2: City Water								
Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG-1801 Vol. 2 Item	Table 1 Item	Notes
<u>Strainer housing</u>	<u>Pressure boundary</u>	<u>Copper alloy</u>	<u>Air – indoor (ext)</u>	<u>None</u>	<u>None</u>	<u>V.F-3 (EP-10)</u>	<u>3.2.1-53</u>	<u>C</u>
<u>Strainer housing</u>	<u>Pressure boundary</u>	<u>Copper alloy</u>	<u>Treated water (int)</u>	<u>Loss of material</u>	<u>Periodic Surveillance and Preventive Maintenance</u>	<u>--</u>	<u>--</u>	<u>G, 305</u>

**Table 3.4.2-5-4-IP2
City Water System
Components Required to Support AFW Pump Room Fire Event
Summary of Aging Management Review**

Table 3.4.2-5-4-IP2: City Water System (CYW)								
Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG-1801 Vol. 2 Item	Table 1 Item	Notes
<u>Strainer housing</u>	<u>Pressure boundary</u>	<u>Copper alloy >15% zn</u>	<u>Treated water (int)</u>	<u>Loss of material</u>	<u>Selective Leaching</u>	<u>--</u>	<u>--</u>	<u>G, 407</u>