

From: [Guzman, Richard](#)
To: [Mirzai, Mahvash](#)
Subject: RE: [SUMMARY OF FEBRUARY 8, 2021, PRE-SUBMITTAL MEETING WITH ENTERGY TO DISCUSS PROPOSED ALTERNATIVE REQUEST FOR CODE CASE PERIODIC INSPECTION FREQUENCY EXTENSION (EPID L 2021 LRM 0019)]
Date: Wednesday, February 24, 2021 3:37:47 PM

Mahvash,

For your information, please see below - meeting summary and list of participants for the February 8, 2021, subject pre-submittal meeting.

Rich Guzman

Sr. PM, Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Office: O-9C7 | Phone: (301) 415-1030
Richard.Guzman@nrc.gov

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LICENSEE: Entergy Nuclear Operations, Inc.
FACILITY: Indian Point Nuclear Generating Station, Unit No. 3
SUBJECT: SUMMARY OF FEBRUARY 8, 2021, PRE-SUBMITTAL MEETING WITH
ENTERGY NUCLEAR OPERATIONS, INC. TO DISCUSS PROPOSED
ALTERNATIVE REQUEST FOR CODE CASE PERIODIC INSPECTION
FREQUENCY EXTENSION (EPID L-2021-LRM-0019)

On February 8, 2021, a Category 1 public meeting by teleconference was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Entergy Nuclear Operations, Inc. (Entergy, the licensee). The purpose of the meeting was for the NRC and Entergy to discuss the licensee's planned alternative request for a one-time exception to the periodic inspection required by American Society of Mechanical Engineers (ASME) Code Case N-513-4, "Evaluation of Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping, Section XI, Division 1," for Indian Point Nuclear Generating Station Unit No. 3 (IP3). The meeting notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21028A635. The licensee provided presentation slides (ADAMS Accession No. ML21036A038). A list of attendees is enclosed.

The licensee provided an overview of its planned alternative request, stating that the relief is being requested to extend the first and only periodic 90-day flaw growth inspection with a requirement to perform the first inspection within 150 days on a service water (SW) line at the plant (SW line 1093). The relaxation would eliminate the need to remove the currently installed leakage mitigation clamp and perform the follow-up periodic inspection.

The licensee also provided background information regarding the initial identification of the through-wall leak on December 10, 2020, the operability evaluation that was developed based on the ASME Code Case N-513-4 methodology, a characterization of the degraded area, the cause of the degradation, and the current condition of the affecting piping.

The licensee stated that the reason for requesting the extension to the 90-day inspection frequency in paragraph 2(e) of Code Case N-513-4 to no more than 150 days was that the provided the periodic inspection requirement in ASME Section XI Code Case N-513-4 would present unusual difficulties without a compensating increase in quality and safety. Specifically, the performance of periodic inspections required by Code Case N-513-4 could result in a safety concern for the Nondestructive Examination (NDE) personnel and potentially impact the performance of the NDE equipment. In addition, activities required for performing additional examinations may further degrade the condition of the component such that the periodic inspection cannot be completed, increasing the likelihood of a plant shutdown required for repair. Therefore, approval of the relief request would allow for continued operation of IP3 to the planned permanent shutdown on April 30, 2021, without removing the existing leak mitigation clamp and performing the periodic inspection required by the Code Case.

Finally, Entergy stated its proposed basis and justification to support the proposed alternative by indicating, in part that the affected pipe remains structurally capable of performing its intended design functions based on the ASME Code Case N-513-4 evaluations. These evaluations have confirmed that additional margin exists beyond those margins required by the Code Case, through the end of the plant's licensed life. Entergy also stated that the planned alternative request was on track for submission in the near term following the pre-submittal meeting. The licensee is requesting approval of the alternative request by February 28, 2021, to ensure compliance with 10 CFR 50.55a and the IP3 ISI program.

Comments from NRC Staff

The NRC staff provided additional comments and/or questions for consideration in the licensee's development of the proposed relief request; the licensee also provided clarification as follows:

- The staff inquired the hole size corresponding to the 200 gpm flowrate which the licensee indicated was the limiting leakage flowrate for the SW system to remain capable of performing its intended cooling function under limiting design bases conditions. The staff indicated that it would be useful to include the information in its submittal.
- The staff asked whether there was any operating experience or failures from the the leak mitigation clamp method being applied. The licensee indicated there hasn't been any history of failures on the housekeeping clamps. The licensee clarified that it not being relied to perform a safety function.

- The staff requested that the assumptions of the stated corrosion rate of 0.012 inches per year be included in the submittal. The licensee offered that the external corrosion is caused by an adjacent vacuum breaker valve with a history of leakage, resulting in intermittent wetting of the surface of the SW pipe. The affected location is being monitored by daily operator walkdown rounds, as required by the code case to ensure the amount of leakage and spray patterns remain stable. The licensee stated that if there was any increase in the leakage or change in spray pattern, it would be documented in the corrective action program.
- The staff asked whether there has been anything done by the licensee to mitigate the corrosion caused by the leak coming from the adjacent vacuum breaker valve. The licensee stated that a hose has been used to divert the leakage away from the surface of the SW pipe.
- The licensee clarified that the alternative request will be proposed under 10 CFR 50.55a(z)(2), hardship without a compensating increase in quality and safety.
- The staff requested that the original design construction code be included in the submittal. The licensee stated that the affected pipe was originally designed in accordance with the requirements of the 1967 Edition of the ANSI B31.1 Code.

Public Comments

The New York state official, Alyse Peterson (New York State Energy Research and Development Authority), inquired whether the associated equipment being cooled by the service water system would still need to be used after the planned shutdown of Unit 3, and if so, what actions from the licensee would be required to address the repair of the affected piping. The NRC staff responded that based on the licensee's response during their presentation, after the plant is cooled down (i.e., to Mode 5) shortly after the planned April 30, 2021 shutdown date, the affected section of piping (i.e., and both trains of service water) will no longer be needed. The technical specifications would allow the service water system to be in alignment such that the affected section of piping will be isolated. The staff added that NRC inspectors will be on site to provide oversight on the licensee's follow-up activities associated with the service water leak.

No regulatory decisions were made regarding the acceptability of the licensee's proposed submittal. No public meeting feedback forms were received.

LIST OF ATTENDEES, FEBRUARY 8, 2021, PRESUBMITTAL MEETING WITH ENTERGY NUCLEAR OPERATIONS, INC.

TO DISCUSS INDIAN POINT NUCLEAR GENERATING STATION, UNIT 3
PROPOSED ALTERNATIVE REQUEST FOR CODE CASE PERIODIC INSPECTION FREQUENCY
EXTENSION

NAME	ORGANIZATION
Richard Guzman	U.S. Nuclear Regulatory Commission (NRC)
James Danna	NRC
Matthew Mitchell	NRC
Jay Collins	NRC
Keith Hoffman	NRC
Doug Tift	NRC
Jenny Weil	NRC
Niklas Floyd	NRC
Mark Draxton	NRC
Neil Sheehan	NRC
David Rudland	NRC
Bob Walpole	Entergy Nuclear Operations, Inc. (Entergy)
John Schrage	Entergy
Mahvash Mirzai	Entergy
Ron Gaston	Entergy
Phil Couture	Entergy
Steve Prussman	Entergy
Justin Sledzinski	Entergy
Gregory Bouderau	Entergy
Joe Weicks	Entergy
Clyde Mackaman	Entergy
Michael Vasely	Entergy
Nelson Azevedo	Entergy
Rich Drake	Entergy
Don Dewey	Entergy
Vinny Andreozzi	Entergy
Dennis Pennino	Entergy
Bonnie Bryant	Entergy
Alyse Peterson	New York State Energy Research and Development Authority
Bridget Frymire	New York State Department of Public Service
Benjamin Dutton	New York State Department of Public Service

Paul Armani	New York Department of Environmental Conservation
Kelly Turturro	New York State of Environmental Conservation
Geri Shapiro	Office of Senator Kirsten Gillibrand (NY)

Note: Participant names attending by teleconference were captured by automated voice prompt from the NRC's conference line service. The names of additional personnel participating by teleconference may not be included in this list if they joined the call-in line through the individuals listed above.

From: Mirzai, Mahvash <mmirzai@entergy.com>
Sent: Friday, February 05, 2021 8:06 AM
To: Guzman, Richard <Richard.Guzman@nrc.gov>
Cc: Gaston, Ronald William <rgasto1@entergy.com>; Couture III, Philip <pcoutur@entergy.com>; Schrage, John <jschrag@entergy.com>; Walpole, Robert <rwalpol@entergy.com>
Subject: [External_Sender] Request for a Pre-Submittal Meeting

Good Morning Rich,

Please find attached a copy of our presentation for the subject pre-submittal meeting on Monday February the 8th.

Thanks,

Mahvash Mirzai
Regulatory Assurance Manager
Indian Point Entergy Center
914-254-7714 (Work)
203-705-9676 (Cell)
mmirzai@entergy.com

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From: Guzman, Richard <Richard.Guzman@nrc.gov>
Sent: Thursday, January 28, 2021 3:05 PM
To: Mirzai, Mahvash <mmirzai@entergy.com>
Cc: Gaston, Ronald William <rgasto1@entergy.com>; Couture III, Philip <pcoutur@entergy.com>; Schrage, John <jschrag@entergy.com>
Subject: RE: FW: Request for a Pre-Submittal Meeting

Mahvash,

The meeting is confirmed for Monday 2/8, 2:00–3:00 PM (Eastern Time). The meeting notice will be published today. Will Entergy have a slide presentation; if so, can you send to me when it's available?

Dial-In No.: 800-857-9888 **(Open Line, for NRC staff and Licensee speakers only)**

Leader Passcode: 19300

Participant Dial-In No.: 888-793-9060 **(Listen-Only Line)**

Participant Passcode: 8407586 (participants can press *1 to ask a question during the public Q&A period).

Rich Guzman

Sr. PM, Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission

Office: 0-9C7 | Phone: (301) 415-1030

Richard.Guzman@nrc.gov

From: Mirzai, Mahvash <mmirzai@entergy.com>

Sent: Wednesday, January 27, 2021 4:43 PM

To: Guzman, Richard <Richard.Guzman@nrc.gov>

Cc: Gaston, Ronald William <rgasto1@entergy.com>; Couture III, Philip <pcoutur@entergy.com>;

Schrage, John <jschrag@entergy.com>

Subject: [External_Sender] FW: Request for a Pre-Submittal Meeting

Hi Rich,

The purpose of the meeting is to discuss a proposed request for a one-time deferral of a 90 day follow up inspection required by the ASME Code Case N-513-4, pursuant to 10 CFR 50.55a(z)(2). Code Case N-513-4 is currently being applied to a through-wall leak in the IP3 Service Water system piping. The proposed alternative will consist of using the Code Case N-513-4 modified to allow for the first and only follow up inspection to be performed within 150 days from detection of the leak rather than the current Code Case requirement of 90 days.

The following Entergy Staff will participate in the Pre-Submittal Call:

Nelson Azevedo

Rich Drake

Ron Gaston

Phil Couture

John Schrage

Steve Prussman

Bob Walpole

Joe Weicks

Mahvash Mirzai

Clyde Mackaman

Thanks,

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