

September 15, 2008

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 – RE: GENERIC LETTER 2008-01, “MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS,” PROPOSED ALTERNATIVE COURSE OF ACTION (TAC NO. MD7837)

Dear Sir or Madam:

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the “subject systems”) are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the “9-month submittal”) of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the “3-month submittal”) of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

By letter dated April 11, 2008, Entergy Nuclear Operations, Inc. (Entergy) submitted a 3-month submittal to GL 2008-01 for Indian Point Nuclear Generating Unit No. 3 (IP3). The NRC staff’s assessment of the responses for IP3 is contained in the enclosure to this letter.

The NRC staff reviewed the licensee’s proposed alternative course of action and the associated basis for acceptance and concluded that for IP3, with the exception of the clarifications and associated requests discussed in the enclosure, they are acceptable. This letter allows the licensee to implement its proposed alternative course of action provided that implementation is consistent with the clarifications and associated requests discussed in the enclosure.

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If you have any questions regarding this letter, please feel free to contact me at (301) 415-2901.

Sincerely,

/RA/

John P. Boska, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosure:
As stated

cc: See next page

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U.S. NUCLEAR REGULATORY COMMISSION
ASSESSMENT OF 3-MONTH RESPONSE
TO GENERIC LETTER 2008-01
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286

1. Background

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the "subject systems") are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance. Specifically, the GL requested licensees to provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the "9-month submittal") of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the "3-month submittal") of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

2. Licensee's Proposed Alternative Course of Action

By letter dated April 11, 2008, Entergy Nuclear Operations, Inc. (Entergy or the licensee) submitted a 3-month response to GL 2008-01 for Indian Point Nuclear Generating Unit No. 3 (IP3). The licensee indicated that for IP3 the only GL 2008-01 reporting requirement that will not be completed by the required response time is walkdowns and inspections of some segments of piping in the GL subject systems, including the high-pressure safety injection system, containment spray system, residual heat removal system, and recirculation system. Since portions of the GL subject system are inaccessible or located in high dose areas during power operation, an outage is required to complete the walkdowns and inspections. The licensee will complete the walkdown and evaluation of the normally accessible portions of the GL systems by October 11, 2008. The licensee plans to complete the remaining walkdowns and inspections of the inaccessible portions of the GL systems during the next refueling outage

Enclosure

that is scheduled for the spring of 2009, and supplement the 9-month response to the GL by October 9, 2009. The licensee provided the following commitments for completion of its GL response:

1. Complete the walkdowns of the inaccessible portions of the system in the next refueling outage that is planned for the spring of 2009.
2. Submit a supplemental response to GL 2008-01 by October 9, 2009.

The NRC staff notes examples where the licensee's 3-month submittal dated April 11, 2008, does not clearly describe the content and schedule for the 9-month submittal. Specifically, although the submittal states the walkdown and evaluation of the normally accessible portions of the GL systems will be completed by October 11, 2008, it is not clear if that is the date the information will be submitted to the NRC. In addition, although the submittal commits to submit a supplemental response to GL 2008-01 by October 9, 2009, it is not clear if this date is expected to be within 90 days following startup from the spring 2009 refueling outage.

The NRC staff requests the licensee to submit the information requested in GL 2008-01 as follows:

- (1) 9-Month Initial Submittal - For the portions of the subject systems that are accessible prior to the IP3 spring 2009 refueling outage, provide all GL requested information to the NRC by October 11, 2008.
- (2) 9-Month Supplemental (Post-Outage) Submittal - Except for the long-term items described below, provide all remaining GL requested information for the subject systems to the NRC within 90 days following startup from the spring 2009 refueling outage at IP3.

For each of these two submittals (the 9-month initial and supplemental submittals), and consistent with the information requested in the GL, the licensee should provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

The NRC staff noted that the licensee's submittal dated April 11, 2008, did not mention other potential long-term actions that are identified in the GL. For instance, the industry is assessing whether it is necessary to perform pump testing to determine the allowable limits on ingested gas volume in pump suction, as well as the need to develop an analysis capability to adequately predict void movement (entrapped gas) from piping on the suction side of the pumps into the pumps. It is unlikely this industry effort will be complete for the 9-month initial or supplemental submittals. Further, Technical Specification changes may be necessary to reflect the improved understanding achieved during response to the GL, but these cannot be fully developed for the 9-month initial or supplemental submittals. A Technical Specifications Task Force traveler may provide a generic example that can be adopted by licensees. The NRC staff requests that the licensee address in its 9-month submittal how it plans to track such long-term actions (e.g., Corrective Action Program and/or commitment tracking). The NRC plans to perform follow up inspections of licensee responses to GL 2008-01 at all plants using a Temporary Instruction inspection procedure.