

November 13, 2002

Mr. Michael R. Kansler  
Senior Vice President and  
Chief Operating Officer  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - RESPONSE TO  
BULLETIN 2002-02, "REACTOR PRESSURE VESSEL HEAD AND VESSEL  
HEAD PENETRATION NOZZLE INSPECTION PROGRAMS" (TAC NO. MB5896)

Dear Mr. Kansler:

On August 9, 2002, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs." In the Bulletin the NRC requested addressees to provide information related to their reactor pressure vessel (RPV) head and vessel head penetration (VHP) nozzle inspection programs for their respective facilities, including a summary discussion of inspection program plans to supplement their required visual inspections with non-visual nondestructive examination methods, or justification for reliance on visual examinations as the primary method to detect degradation. Addressees were requested to respond to Item 1 of the Bulletin within 30 days of its issuance, or within 15 days of its issuance, to provide an alternative course of action, including the basis for acceptability of the proposed action.

By letter dated September 11, 2002, Entergy Nuclear Operations, Inc. (Entergy) provided a response to Item 1 of the Bulletin, indicating the plans to perform RPV head and VHP nozzle inspections at Indian Point Nuclear Generating Unit No. 2 (IP2). Since the inspection plan for IP2 had been previously sent to the NRC in a letter dated July 23, 2002, Entergy stated that the IP2 inspection plan remains the appropriate course of action to demonstrate compliance with the applicable regulations. The response also indicated that IP2 is in the category of plants considered to have low susceptibility to RPV head and VHP cracking, based on a susceptibility ranking of less than 8 effective degradation years. However, Entergy elected to implement an examination during the currently ongoing refueling outage (RFO) (2R15) which is consistent with the recommendations in Bulletin 2002-02 for plants with moderate susceptibility.

The NRC staff has reviewed your response to Item 1 of the Bulletin. The staff finds your immediate inspection plan to supplement the 100% bare metal visual examination with ultrasonic testing during RFO 2R15 to be adequate for providing reasonable assurance that existing regulatory requirements will be met.

The staff notes that you have not finalized your plans for future inspections. You are requested to provide your future inspection plans no later than 90 days prior to the start of the next RFO (2R16). The staff also notes that your justification for the reliability and effectiveness of visual examinations refer to the Electric Power Research Institute Materials Reliability Program (MRP) inspection plan for pressurized water reactor RPV upper head penetrations. The staff has not completed its review of the MRP inspection plan and, as such, has not made a determination

M. Kansler

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on the adequacy of the program for ensuring applicable regulatory requirements are met. The staff's assessment of your justification and the adequacy of your long-term inspection program plans will be determined upon completion of the staff's review of the MRP proposed inspection plan.

Also, please note that as stated in Item 2 of the Bulletin, you are to report to the Commission your inspection scope and results within 30 days after plant restart following the inspection of the RPV head and VHP nozzles.

Please contact me at (301) 415-1457 if you have any questions on this issue.

Sincerely,

*/RA/*

Patrick D. Milano, Senior Project Manager, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-247

cc: See next page

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Indian Point Nuclear Generating Station  
Unit 2

Mr. Jerry Yelverton  
Chief Executive Officer  
Entergy Operations  
1340 Echelon Parkway  
Jackson, MS 39213

Mr. Fred Dacimo  
Vice President - Operations  
Entergy Nuclear Operations, Inc.  
Indian Point Nuclear Generating Units 1 & 2  
295 Broadway, Suite 1  
P.O. Box 249  
Buchanan, NY 10511-0249

Mr. Robert J. Barrett  
Vice President - Operations  
Entergy Nuclear Operations, Inc.  
Indian Point Nuclear Generating Units 3  
295 Broadway, Suite 3  
P.O. Box 308  
Buchanan, NY 10511-0308

Mr. Dan Pace  
Vice President Engineering  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

Mr. James Knubel  
Vice President Operations Support  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

Mr. Christopher J. Schwarz  
General Manager Operations  
Entergy Nuclear Operations, Inc.  
Indian Point Nuclear Generating Unit 2  
295 Broadway, Suite 1  
P.O. Box 249  
Buchanan, NY 10511-0249

Mr. John Kelly  
Director of Licensing  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

Ms. Charlene Faison  
Manager, Licensing  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

Mr. John McCann  
Manager, Nuclear Safety and Licensing  
Indian Point Nuclear Generating Unit 2  
295 Broadway, Suite 1  
P. O. Box 249  
Buchanan, NY 10511-0249

Mr. Harry P. Salmon, Jr.  
Director of Oversight  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

Mr. John M. Fulton  
Assistant General Counsel  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

Mr. Thomas Walsh  
Secretary - NFSC  
Entergy Nuclear Operations, Inc.  
Indian Point Nuclear Generating Unit 2  
295 Broadway, Suite 1  
P. O. Box 249  
Buchanan, NY 10511-0249

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector, Indian Point 2  
U. S. Nuclear Regulatory Commission  
295 Broadway, Suite 1  
P.O. Box 38  
Buchanan, NY 10511-0038

Indian Point Nuclear Generating Station  
Unit 2

Mr. William M. Flynn, President  
New York State Energy, Research, and  
Development Authority  
17 Columbia Circle  
Albany, NY 12203-6399

Mr. J. Spath, Program Director  
New York State Energy, Research, and  
Development Authority  
17 Columbia Circle  
Albany, NY 12203-6399

Mr. Paul Eddy  
Electric Division  
New York State Department  
of Public Service  
3 Empire State Plaza, 10<sup>th</sup> Floor  
Albany, NY 12223

Mr. Charles Donaldson, Esquire  
Assistant Attorney General  
New York Department of Law  
120 Broadway  
New York, NY 10271

Mayor, Village of Buchanan  
236 Tate Avenue  
Buchanan, NY 10511

Mr. Ray Albanese  
Executive Chair  
Four County Nuclear Safety Committee  
Westchester County Fire Training Center  
4 Dana Road  
Valhalla, NY 10592

Ms. Stacey Lousteau  
Treasury Department  
Entergy Services, Inc.  
639 Loyola Avenue  
Mail Stop: L-ENT-15E  
New Orleans, LA 70113

Alex Matthiessen  
Executive Director  
Riverkeeper, Inc.  
25 Wing & Wing  
Garrison, NY 10524

Paul Leventhal  
The Nuclear Control Institute  
1000 Connecticut Avenue NW  
Suite 410  
Washington, DC, 20036

Karl Copeland  
Pace Environmental Litigation Clinic  
78 No. Broadway  
White Plains, NY 10603

Jim Riccio  
Greenpeace  
702 H Street, NW  
Suite 300  
Washington, DC 20001