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NL-13-110

August 27, 2013

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

SUBJECT: Indian Point Energy Center's First Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (TAC Nos. MF0744 and MF0745)
Indian Point Unit Numbers 2 and 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

- REFERENCES:**
1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
 2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
 3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
 4. Entergy letter to NRC (NL-12-144), Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 29, 2012
 5. Entergy letter to NRC (NL-13-042), Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Entergy. Reference 1 was immediately effective and directs Entergy to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event

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of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.


Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Entergy initial status report regarding mitigation strategies. Reference 5 provided the Entergy overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. Should you have any questions regarding this submittal, please contact Mr. Robert Walpole, Manager, Licensing at (914) 254-6710.

I declare under penalty of perjury that the foregoing is true and correct; executed on August 27, 2013.

Sincerely,



JAV / sp

Attachment: Indian Point Energy Center's First Six-Month Status Report for the Implementation of Order EA-12-049 Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: Mr. Douglas V. Pickett, Senior Project Manager, NRC NRR DORL
Mr. William M. Dean, Regional Administrator, NRC Region 1
NRC Resident Inspectors Office
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA
Ms. Bridget Frymire, New York State
Mr. Robert J. Fretz Jr., NRC NRR OE OB
Mr. Robert L. Dennig, NRC NRR DSS SCVB
Ms. Jessica A. Kratchman NRC NSIR DPR DDEP IRIB
Mr. Eric E. Bowman, NRC NRR DPR PGCB
Ms. Eileen M. Mckenna, NRC NRO DSRA BPTS NRC NRR DSS SCVB

ATTACHMENT TO NL-13-110

INDIAN POINT ENERGY CENTER'S FIRST SIX-MONTH STATUS
REPORT FOR THE IMPLEMENTATION OF ORDER EA-12-049
MODIFYING LICENSES WITH REGARD TO REQUIREMENTS FOR
MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS
EXTERNAL EVENTS

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

**Indian Point Energy Center's First Six Month Status Report
for the Implementation of Order EA-12-049 Order Modifying
Licenses with Regard to Requirements for Mitigation
Strategies for Beyond-Design-Basis External Events**

Introduction

Entergy Nuclear Operations, Inc. (Entergy) developed an Overall Integrated Plan (Reference 1) for Indian Point Energy Center (IPEC), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

Milestone Accomplishments

The following milestone(s) have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of July 31, 2013:

None

Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

- Purchase Equipment

This milestone was combined with the Procure Equipment milestone as the two were considered to be the same activity.

- Validation:

Walk-throughs or Demonstration(s): A target completion date has been added to the milestone listing for completion of the walk-throughs. The walk-throughs will be completed during the Indian Point 2 FLEX modification implementation outage. This new milestone target date does not impact the Order implementation date.

The revised milestone target completion dates do not impact the order implementation date.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit Overall Integrated	Feb 2013	Complete	

Implementation Plan

Submit 6 Month Updates

Update 1	Aug 2013	Complete
Update 2	Feb 2014	Not Started
Update 3	Aug 2014	Not Started
Update 4	Feb 2015	Not Started
Update 5	Aug 2015	Not Started
Update 6	Feb 2016	Not Started
Update 7	Aug 2016	Not Started

Perform Staffing Analysis

Dec 2013 Started

Modifications

Engineering and Implementation

N-1 Walkdown (Unit2)	Spring 2014	Not Started
Design Engineering	Dec 2014	Started
Unit 2 Implementation Outage	Apr 2016	Not Started
Unit 3 Implementation Outage	Apr 2015	Not Started

On-site FLEX Equipment

Purchase / Procure Dec 2014 Started Revised

Off-site FLEX Equipment

Develop Strategies with RRC Nov 2013 Started

Procedures

PWROG issues NSSS-specific guidelines	Jan 2014	Started	Revised
Create Indian Point FSG	Oct 2014	Started	
Create Maintenance Procedures	Oct 2014	Not Started	

Training:

Develop Training Plan	May 2015	Not Started
Implement Training	Nov 2015	Not Started

Validation / Demonstration

May 2016 Not Started Revised

Submit Completion Report

Jun 2016 Not Started

Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1).

Need for Relief/Relaxation and Basis for the Relief/Relaxation

IPEC expects to comply with the order implementation date and no relief/relaxation is required at this time.

Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan and the status of each item.

Overall Integrated Plan Open Item	Status
No open items.	

Draft Safety Evaluation Open Item
No open items.

Status

Potential Draft Safety Evaluation Impacts

The Draft Safety Evaluation has not been issued at this time.

References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Entergy letter to NRC (NL-13-042), Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.