



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
P.O. Box 249
Buchanan, NY 10511-0249

March 27, 2002

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-02-016

US Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station O-P1-17
Washington, DC 20555-0001

**SUBJECT: LICENSE AMENDMENT REQUEST (LAR 02-005) CONVERSION TO
IMPROVED STANDARD TECHNICAL SPECIFICATIONS**

REFERENCES: 1) NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 2, dated April 2001
2) 10 CFR 50.36, "Technical Specifications," as amended
3) Consolidated Edison letter to NRC, NL-00-147, "Proposed Technical Specification Amendment – Changes to Primary to Secondary Leakage Limits and Steam Generator Tube Inservice Surveillance Requirements," dated December 11, 2000

Dear Sir:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations Inc. (Entergy) hereby proposes to amend the Indian Point 2 Plant Operating License, Appendices A and B, "Technical Specifications" (TS). The proposed amendment converts the Indian Point 2 (IP2) Current Technical Specifications (CTS) to Improved Technical Specifications (ITS). The conversion is based upon:

- NUREG 1431, "Standard Technical Specifications Westinghouse Plants," (Reference 1), and;
- The Code of Federal Regulations (CFR) (Reference 2).

The proposed license amendment request is also consistent with the Indian Point 3 (IP3) ITS wherever practicable. The IP3 ITS was approved as Amendment 205 to Facility Operating License No. DPR-64 on February 27, 2001 (TAC No. MA4359).

A001

Entergy's license amendment request to convert the IP2 CTS to the IP2 ITS is enclosed herewith on CD-ROM. For your convenience, the CD-ROM also includes the following additional reference documents:

- A copy of this cover letter;
- The IP2 CTS through Amendment 221, and;
- The IP3 ITS through Amendment 209.

This cover letter and the CD-ROM were prepared in accordance with the guidance provided in NRC Regulatory Issue Summary 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM."

The portion of the CD-ROM constituting the conversion submittal of the IP2 CTS to the IP2 ITS is organized into six (6) major sections as follows:

- I. Application of NRC Selection Criteria, Including the CTS to ITS Disposition and Relocation Matrix (Split Report);
- II. Relocated Requirements: Descriptions and Justifications for the relocation of selected IP2 CTS into licensee controlled documents with change provisions described by regulation such as 10 CFR 50.59;
- III. IP2 Conversion Packages: Descriptions and Justifications for the conversion of IP2 CTS to IP2 ITS. This section also includes a determination of No Significant Hazards Consideration (NSHC) as required by 10 CFR 50.91(a) for changes classified as Less Restrictive (L);
- IV. Evaluations supporting a finding of NSHC for proposed changes classified as Administrative (A), More Restrictive (M), Less Restrictive Administrative (LA) or Relocated (R) (Note that NSHCs for changes classified as Less Restrictive (L) are included in Section III);
- V. IP2 CTS Master Markup, and;
- VI. IP2 ITS Specifications and ITS Bases.

Attachment 1 of this letter, "Synopsis of the License Amendment Request for Conversion to Improved Technical Specifications (ITS)," provides a detailed description of the organization and contents of each of the Sections.

To facilitate your review, Section II, "Relocated Requirements," and Section III, "IP2 Conversion Packages," are further divided into subsections corresponding to each individual relocated specification and proposed Limiting Condition for Operation (LCO). A brief statement summarizing each proposed change is also included in Section III. This presentation is intended to permit each specification to be reviewed independently and to aid in the preparation of the Safety Evaluation Report.

Attachment 2, "List of IP2 ITS Conversion Packages," provides a list of the 28 individual relocated subsections and the 102 LCO subsections described above.

Attachment 3, "List of Pending License Amendment Requests (LARs) and Approved Amendments not Reflected in Submittal," provides a listing of all currently docketed LARs and effective Amendments that are not incorporated into the conversion package. Entergy requests continuing processing of the proposed CTS changes in parallel with this submittal. During NRC review of the IP2 ITS, supplemental submittals incorporating Amendments 222, 223, 224 and approved LARs will be made as required. These supplements will be coordinated with the NRC staff reviewers to ensure that the ITS review is not adversely impacted.

Attachment 4, "Environmental Assessment," provides Entergy's evaluation concluding that conversion of the IP2 CTS to the IP2 ITS meets the categorical exclusion criteria of 10 CFR 51.22(c)(9) for licensing actions not requiring environmental review.

Throughout the conversion process, Entergy has endeavored to limit the Technical Specification changes to those required to establish conformance with the Standard Technical Specifications (STS) (Reference 1). However, in several cases the IP2 design does not allow the direct adoption of STS. These design differences, when evaluated in accordance with 10 CFR 50.36, sometimes resulted in the need for plant-specific TS requirements. The IP2 Conversion Files provide sufficient detail to demonstrate the need for these changes and to support prompt review and approval. Typically, these changes are identical to the ITS already approved for IP3 and need not be handled as out of scope changes.

Proposed ITS section 3.3.1, "Reactor Protection System (RPS) Instrumentation," and section 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," contain a number of bracketed allowable values. IP2 is currently in the process of developing revised values for these functions using a methodology consistent with Part I of ISA-S67.04-1994, "Setpoints for Nuclear Safety-Related Instrumentation." When completed, the site-specific methodology and the resulting values will be submitted to the NRC for review and approval as part of a supplement to this LAR. Entergy anticipates submitting this supplement in July 2002.

Proposed ITS section 5.6.6, "Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)," was written as though the IP2 PTLR and associated methodology were already approved. The PTLR is currently being developed and will be submitted to the NRC for review and approval as part of a supplement to this LAR. Entergy also anticipates submitting this supplement in July 2002.

Finally, note that ITS section 5.5.7, "Steam Generator (SG) Tube Surveillance Program," proposes to adopt the industry-standard regulatory framework for steam generators modeled on the Nuclear Energy Institute (NEI) 97-06, "Steam Generator

Program Guidelines." Entergy's intention to adopt the NEI guidelines was previously described in Reference 3.

Entergy intends to implement this proposed license amendment in April 2003. This date is based on the time required for procedure revisions, including the development of new programs and training. This date is also predicated on the NRC review being completed and a Safety Evaluation issued by January 2003.

Implementation of the IP2 ITS will involve the performance of a number of new Surveillance Requirements. Entergy intends to treat these new requirements as being met at the time of implementation, with the first scheduled performance to be completed within the required frequency from the date of implementation.

The Station Nuclear Safety Committee (SNSC) and the Safety Review Committee (SRC) have reviewed the proposed change. Both committees concur that the proposed change does not involve a significant hazards consideration as defined by 10 CFR 50.92(c).

In accordance with 10 CFR 50.91, a copy of this submittal and the associated attachments are being submitted to the designated New York State official.

No new regulatory commitments are being made by Entergy in this correspondence.

Should you or your staff have any questions or require additional information, please contact the IP2 ITS Project Manager, Mr. William Blair at (914) 827-7631.

Sincerely,



Fred Dacimo
Vice President - Operations
Indian Point 2

Enclosure
Attachments
cc: see page 5

cc: Mr. Hubert J. Miller
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Entergy Nuclear Operations, Inc.) Docket No. 50-247
(Indian Point Station, Unit No. 2))

APPLICATION FOR AMENDMENT TO
OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission, Entergy Nuclear Operations, as holder of Facility Operating License No. DPR-26, hereby applies for amendment of the Indian Point Nuclear Generating Unit No. 2 Technical Specifications contained in Appendix A of the license.

The proposed Technical Specification revisions are set forth in the "IP2 Conversion Packages" directory of the enclosed CD-ROM. The assessments for less restrictive changes in this directory, as well as the assessment in the "Generic NSHC," directory for other changes, demonstrate that the proposed amendments do not involve a significant hazards consideration as defined in 10 CFR 50.92(c).

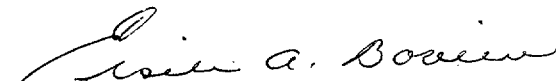
As required by 10 CFR 50.91(b)(1), a copy of this Application and an analysis concluding that the proposed changes do not involve a significant hazards consideration have been provided to the appropriate New York State official designated to receive such amendments.

BY:



Fred Dacimo
Vice President – Operations
Indian Point 2

Subscribed and sworn to
before me this 27 day
MARCH, 2002.


Notary Public

ERSILIA A. BOVIERO
Notary Public, State of New York
No. 01AM6038689
Qualified in Westchester County
Commission Expires March 20, 2004

ATTACHMENT 1
To NL-02-016

**Synopsis of the
License Amendment Request
for Conversion to
Improved Technical Specifications (ITS)**

**Entergy Nuclear Operations Inc.
Indian Point 2
Docket No. 50-247**

The submittal for the conversion of the Indian Point 2 (IP2) Current Technical Specifications (CTS) to the IP2 Improved Technical Specifications (ITS) consists of six (6) sections. The 6 sections of the conversion submittal are as follows:

- I. Application of NRC Selection Criteria, Including the CTS to ITS Disposition and Relocation Matrix (Split Report);
- II. Relocated Requirements: Descriptions and Justifications for the relocation of selected IP2 CTS into licensee controlled documents with change provisions described by regulation such as 10 CFR 50.59;
- III. IP2 Conversion Packages: Descriptions and Justifications for the conversion of IP2 CTS to IP2 ITS. This section also includes a determination of No Significant Hazards Consideration (NSHC) as required by 10 CFR 50.91(a) for changes classified as Less Restrictive (L);
- IV. Evaluations supporting a finding of NSHC for proposed changes classified as Administrative (A), More Restrictive (M), Less Restrictive Administrative (LA) or Relocated (R) (Note that NSHCs for changes classified as Less Restrictive (L) are included in Section III);
- V. IP2 CTS Master Markup, and;
- VI. IP2 ITS Specifications and ITS Bases.

A detailed description of each of these 6 sections is presented on the following pages.

Section I: Application of NRC Selection Criteria, Including the Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) Disposition and Relocation Matrix (Split Report)

Section I is an explanation of the process and a summary of the results of the application of the 10 CFR 50.36(c)(2)(ii) criteria for which operational requirements must be classified as Technical Specifications. The "NRC Selection Criteria" document provides a discussion of how the criteria of 10 CFR 50.36(c)(2)(ii) were applied to the IP2 CTS requirements. The "ITS Disposition and Relocation Matrix" (Split Report) presents a summary of the results of this process by listing each CTS specification and whether or not the CTS specification is retained in the IP2 ITS. If retained in the IP2 ITS, the matrix identifies the new ITS specification number, the criterion of 10 CFR 50.36(c)(2)(ii) that applies, and the basis for inclusion of the requirement in the

ITS. If not retained in the IP2 ITS, the matrix identifies the Section II subsection that provides the detailed justification for relocation and the proposed new location for relocated requirements.

Section II. Descriptions and Justifications for the Relocation of Selected IP2 Current Technical Specifications (CTS)

Section II consists of 28 subsections, which are listed in Attachment 2 — one for each of the CTS requirements that do not meet any of the 10 CFR 50.36(c)(2)(ii) criteria for inclusion in the Technical Specifications. Each of the 28 subsections consists of two parts as follows:

Part 1 includes the associated CTS pages, annotated to show the relocated CTS requirement. The cover page for Part 1 identifies the effective amendment and any pending License Amendment Requests (LARs) for each of the affected CTS pages. Pending LARs are not incorporated into the ITS conversion package. These LARs are listed in Attachment 3.

Part 2 is the justification for relocation of the CTS requirement to a document controlled by Entergy in accordance with 10 CFR 50.59 and/or 10 CFR 50.54(a). The justification for relocation consists of an evaluation of the CTS requirement against each of four (4) criteria in 10 CFR 50.36(c)(2)(ii) and a determination that the relocated requirement has not been previously evaluated as risk significant in the IP2 Individual Plant Examination (IPE). This section also identifies the proposed new location for the CTS requirement and a discussion of how this location ensures an appropriate change control process, as well as an appropriate level of regulatory oversight, are maintained.

Section III. Descriptions and Justifications for the Conversion of IP2 Current Technical Specifications (CTS) to IP2 Improved Technical Specifications

Section III consists of 102 subsections, which are listed in Attachment 2 — one for each of the proposed IP2 Technical Specifications. To facilitate NRC review, each subsection contains the information necessary to review one proposed IP2 Specification. Each of the 102 subsections is further divided into six (6) parts as follows:

Part 1 is a clean typed copy of the proposed IP2 ITS including the associated Bases.

Part 2 consists of the CTS pages annotated to show the differences between the CTS and the IP2 ITS (CTS Markups). These CTS Markups also provide a cross reference to the equivalent ITS requirement in both Part 1 and Part 3 of the subsection. Where a proposed ITS requirement differs from a CTS requirement, individual details of the CTS revision are annotated with alphanumeric designators which correspond to the appropriate Discussion of Change (DOC) in Part 4 of the subsection. The alphanumeric designators also correspond to the evaluations supporting a finding of NSHC in Part 6 of the subsection. The cover page for Part 2 identifies the effective amendment and any LARs for each of the affected CTS pages. Pending LARs are not incorporated into the ITS conversion package. These LARs are listed in Attachment 3.

Part 3 consists of a copy of NUREG-1431, Revision 2, annotated to show the differences between NUREG-1431 and the proposed IP2 ITS (ITS Markup). These ITS Markups include cross references to the descriptions and justifications of the changes included in Part 3 and cross references to the equivalent IP2 CTS in Part 2. Cross references to the Justification of Differences between NUREG-1431 and the IP2 ITS contained in Part 5 are annotated. The cover page for Part 3 also identifies any approved Post-Revision 2 change (Technical Specification Task Force (TSTF) Change Traveler) to NUREG 1431 which is being implemented as part of this submittal. TSTF 358, "Missed Surveillance Requirements," is the only such item incorporated into the proposed ITS.

Part 4 consists of a DOC for each of the differences between the CTS and the proposed ITS. The changes are listed by the alphanumeric designators which provide a cross reference to the CTS Markup in Part 2, the NSHC in Part 6, and the ITS Markup in Part 3. Each DOC includes a reference to and description of both the CTS and ITS requirements being discussed, the reason the change is needed, and a detailed justification as to why the proposed change does not result in a significant safety hazard.

Each of the changes between the CTS and the ITS in Part 4 is classified into one of the following categories:

Administrative Changes (with a designator A.n) are changes to the CTS that do not result in new requirements or change operational restrictions or flexibility. These changes are supported in aggregate by a single NSHC contained in Section IV.

More Restrictive Changes (with a designator M.n) are changes to the CTS that establish a new requirement, require new or more frequent testing, or

reduce operational flexibility. These changes are supported in aggregate by a single NSHC contained in Section IV.

Less Restrictive Changes (with a designator L.n) are changes to the CTS that eliminate existing requirements, require less or less frequent testing, or increase operational flexibility. These changes are supported by a change specific NSHC contained in Part 6 of each subsection.

Less Restrictive Administrative Changes (with a designator LA.n) are changes to the CTS that relocate details out of the CTS and into the Bases, FSAR, or other appropriate licensee-controlled document. These are administrative changes which do not alter the CTS requirement, it simply relocates the item to a licensee-controlled document. These are less restrictive changes because the relocation results in a less restrictive change control process and a reduced level of regulatory oversight. These changes are supported in aggregate by a single NSHC contained in Section IV.

Part 5 includes the Justification of Differences (JDs) between NUREG-1431 and the IP2 ITS. Differences between the IP2 ITS and NUREG-1431, Revision 2, were made for any of the following reasons:

CLB: Current Licensing Bases (CLB) are maintained where a demonstrated need exists and the CTS requirement was previously justified and approved. Each of these changes was evaluated to ensure that the need still exists and that maintaining the CLB does not result in a significant adverse impact on safety.

PA: Plant-specific wording preferences or minor editorial improvements were incorporated into the Bases to improve clarity, or ensure requirements are fully understood and consistently applied by the Entergy staff.

DB: Plant-specific difference in the design or design bases were incorporated as necessary to more precisely describe IP2 current design or practice.

T: Differences Based on an approved Generic Change Traveler for NUREG-1431 were incorporated. The cover page for Part 5 identifies associated ISTS Change Travelers.

X: Changes for any reason not described above.

Part 6 consists of the Entergy evaluations supporting a finding of NSHC as required by 10 CFR 50.91(a) for proposed changes classified as Less Restrictive.

Section IV Evaluations supporting a finding of NSHC for proposed changes classified as Administrative (A), More Restrictive (M), Less Restrictive Administrative (LA) or Relocated (R)

Section IV consists of the Entergy evaluations supporting a finding of No Significant Hazards Consideration (NSHC) as required by 10 CFR 50.91(a) for proposed changes classified as Administrative, More Restrictive or Less Restrictive Administrative (LA).

Section V. IP2 CTS Master Markup

Section V is a compilation of all CTS pages annotated in Sections II and III to show differences between CTS and ITS. The compilation volume provides an entire markup of the CTS (in CTS section order) to facilitate NRC review efforts and to demonstrate that all CTS requirements are accounted for. In many instances the same CTS page is used in different ITS sections. As a result, these CTS pages appear more than once in the compilation volume with each page annotated to reflect the associated ITS Specification. A CTS Master Markup table of contents is also provided.

Section VI. IP2 ITS Specifications and ITS Bases

Section VI is a copy of the IP2 ITS Specifications and ITS Bases presented in their complete form to facilitate the review of the document in an integrated manner.

ATTACHMENT 2
To NL-02-016

List of the IP2 ITS Conversion Packages

Entergy Nuclear Operations Inc.
Indian Point 2
Docket No. 50-247

- 1.0 USE AND APPLICATION
- 2.0 SAFETY LIMITS (SLs)
- 3.0 LCO and SR APPLICABILITY
 - 3.1.1 Shutdown Margin (SDM)
 - 3.1.2 Core Reactivity
 - 3.1.3 Moderator Temperature Coefficient (MTC)
 - 3.1.4 Rod Group Alignment Limits
 - 3.1.5 Shutdown Bank Insertion Limits
 - 3.1.6 Control Bank Insertion Limits
 - 3.1.7 Rod Position Indication
 - 3.1.8 PHYSICS TESTS Exceptions - MODE 2
 - 3.2.1 Heat Flux Hot Channel Factor (FQ(Z))
 - 3.2.2 Nuclear Enthalpy Rise Hot Channel Factor (FN delta H)
 - 3.2.3 AXIAL FLUX DIFFERENCE (AFD)
 - 3.2.4 QUADRANT POWER TILT RATIO (QPTR)
 - 3.3.1 Reactor Protection System (RPS) Instrumentation
 - 3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation
 - 3.3.3 Post Accident Monitoring (PAM) Instrumentation
 - 3.3.4 Remote Shutdown
 - 3.3.5 Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation
 - 3.3.6 Containment Purge System and Pressure Relief Line Isolation Instrumentation
 - 3.3.7 Control Room Ventilation System (CRVS) Actuation Instrumentation
 - 3.4.1 RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits
 - 3.4.2 RCS Minimum Temperature for Criticality
 - 3.4.3 RCS Pressure and Temperature (P/T) Limits
 - 3.4.4 RCS Loops - MODES 1 and 2
 - 3.4.5 RCS Loops - MODE 3
 - 3.4.6 RCS Loops - MODE 4
 - 3.4.7 RCS Loops - MODE 5, Loops Filled
 - 3.4.8 RCS Loops - MODE 5, Loops Not Filled
 - 3.4.9 Pressurizer
 - 3.4.10 Pressurizer Safety Valves
 - 3.4.11 Pressurizer Power Operated Relief Valves (PORVs)
 - 3.4.12 Low Temperature Overpressure Protection (LTOP)
 - 3.4.13 RCS Operational LEAKAGE
 - 3.4.14 Pressure Isolation Valve (PIV) Leakage
 - 3.4.15 RCS Leakage Detection Instrumentation
 - 3.4.16 RCS Specific Activity
 - 3.5.1 Accumulators
 - 3.5.2 ECCS - Operating
 - 3.5.3 ECCS - Shutdown
 - 3.5.4 Refueling Water Storage Tank (RWST)

- 3.6.1 Containment
- 3.6.2 Containment Air Locks
- 3.6.3 Containment Isolation Valves
- 3.6.4 Containment Pressure
- 3.6.5 Containment Air Temperature
- 3.6.6 Containment Spray System and Containment Fan Cooler Unit (FCU) System
- 3.6.7 Recirculation Fluid pH Control System
- 3.6.8 Hydrogen Recombiners
- 3.6.9 Isolation Valve Seal Water (IVSW) System
- 3.6.10 Weld Channel and Penetration Pressurization System (WC&PPS)
- 3.7.1 Main Steam Safety Valves (MSSVs)
- 3.7.2 Main Steam Isolation Valves (MSIVs) and Main Steam Check Valves (MSCVs)
- 3.7.3 Main Feedwater Isolation
- 3.7.4 Atmospheric Dump Valves (ADVs)
- 3.7.5 Auxiliary Feedwater (AFW) System
- 3.7.6 Condensate Storage Tank (CST)
- 3.7.7 Component Cooling Water (CCW) System
- 3.7.8 Service Water System (SWS)
- 3.7.9 Ultimate Heat Sink (UHS)
- 3.7.10 Control Room Ventilation System (CRVS)
- 3.7.11 Spent Fuel Pit Water Level
- 3.7.12 Spent Fuel Pit Boron Concentration
- 3.7.13 Spent Fuel Pit Storage
- 3.7.14 Secondary Specific Activity
- 3.8.1 AC Sources - Operating
- 3.8.2 AC Sources - Shutdown
- 3.8.3 Diesel Fuel Oil and Starting Air
- 3.8.4 DC Sources - Operating
- 3.8.5 DC Sources - Shutdown
- 3.8.6 Battery Cell Parameters
- 3.8.7 Inverters - Operating
- 3.8.8 Inverters - Shutdown
- 3.8.9 Distribution Systems - Operating
- 3.8.10 Distribution Systems - Shutdown
- 3.9.1 Boron Concentration
- 3.9.2 Nuclear Instrumentation
- 3.9.3 Residual Heat Removal (RHR) and Coolant Circulation - High Water Level
- 3.9.4 Residual Heat Removal (RHR) and Coolant Circulation - Low Water Level
- 3.9.5 Refueling Cavity Water Level
- 4.0 DESIGN FEATURES
- 5.1 Responsibility
- 5.2 Organization
- 5.3 Unit Staff Qualifications

- 5.4 Procedures
 - 5.5.1 ODCM
 - 5.5.2 Primary Coolant Sources Outside Containment
 - 5.5.3 Radioactive Effluent Controls Program
 - 5.5.4 Component Cyclic or Transient Limit
 - 5.5.5 Reactor Coolant Pump Flywheel Inspection Program
 - 5.5.6 Inservice Testing Program
 - 5.5.7 Steam Generator (SG) Tube Surveillance Program
 - 5.5.8 Secondary Water Chemistry Program
 - 5.5.9 Ventilation Filter Testing Program (VFTP)
 - 5.5.10 Explosive Gas and Storage Tank Radioactivity Monitoring Program
 - 5.5.11 Diesel Fuel Oil Testing Program
 - 5.5.12 Technical Specifications (TS) Bases Control Program
 - 5.5.13 Safety Function Determination Program (SFDP)
 - 5.5.14 Containment Leakage Rate Testing Program
 - 5.5.15 Battery Monitoring and Maintenance Program
- 5.6 Reporting Requirements
 - R.01 CTS 3.1.E: RCS Maximum Reactor Coolant Oxygen, Chloride and Fluoride Concentration
 - R.02 CTS 3.2: Chemical and Volume Control System
 - R.03 CTS 3.11: Movable Incore Instrumentation
 - R.04 CTS 3.12: Shock Suppressors (Snubbers)
CTS 4.12: Shock Suppressors (Snubbers)
 - R.05 CTS 3.14: Hurricane Alert
CTS 4.17: Hurricane Alert
 - R.06 CTS 3.15: Meteorological Monitoring System
CTS 4.19: Meteorological Monitoring System
 - R.07 CTS 3.16: Reactor Coolant System Vents
CTS 4.20: Reactor Coolant System Vents
 - R.08 CTS 3.1.B.5: Pressurizer Heatup and Cooldown Limits
 - R.09 CTS 3.1.B.4: SG Secondary Side Minimum Temperature for Pressurization
 - R.10 CTS 4.3: Reactor Coolant System Integrity Testing
 - R.11 CTS 3.1.F.2.d: Leakage into the Containment Free Volume (and associated requirements)
 - R.12 CTS 3.7.C: Gas Turbines
CTS 4.6.D: Gas Turbine Testing
CTS E.6.E: Gas Turbine Fuel Supply
 - R.13 CTS 3.7.E: Electrical Circuits in Containment
 - R.14 CTS 3.8: Manipulator Cranes and Heavy Loads in Proximity to Spent Fuel
 - R.15 CTS 3.3.I: Cable Tunnel Ventilation Fans
 - R.16 CTS 3.4.A.3: City Water
 - R.17 CTS 3.3.G: Post Accident Containment Venting System
CTS 4.5.G: Containment Venting System

- R.18 CTS 2.3.3: Control Rod Protection System
CTS Table 4.1-1, # 28: Control Rod Protection System Testing
- R.19 CTS Table 4.1-3, No.6: Refueling Interlocks
- R.20 CTS Table 4.1-3, No.8: Turbine Stop Valve (i.e., Overspeed Protection Testing)
- R.21 CTS 3.8.B.7: Area Radiation Monitoring
CTS Table 4.1-1, No 19: Area Red Monitor Testing
- R.22 CTS 4.15: Radioactive Materials Surveillance
CTS 6.9.2.c: Reporting Sealed Source Leakage
- R.23 CTS 3.8.A.7: Reactor Temperature < 140 F when RPV head bolts less than fully tensioned
- R.24 CTS 3.8.B.4: Refueling, Fuel Handling and Storage (Decay Time)
- R.25 CTS 3.8.B.3: Refueling, Fuel Handling and Storage (Communications)
- R.26 CTS 3.8.B.10: Refueling - Licensed Senior Operator in Charge during Core Geometry Changes
- R.27 CTS 3.8.B.6: Fuel Storage Building Ventilation System
CTS 4.5.F: Fuel Storage Building Air Filtration
- R.28 CTS 3.8.B.8: Containment Penetrations during Refueling Operations

ATTACHMENT 3
To NL-02-016

**List of Pending
License Amendment Requests (LARs) and Approved
Amendments not Reflected in Submittal**

**Entergy Nuclear Operations Inc.
Indian Point 2
Docket No. 50-247**

Letter/ Amendment No. and Date	LAR/Amendment Title
NL-02-001 01/08/02	Deletion of Technical Specifications for Reactor Vessel Material Surveillance Program (also includes changes to Inservice Inspection and Testing, Design Features – Containment, and Administrative Controls – Training, to correct errors and changes to Responsibility and Organization, to reflect the organizational changes resulting from the license transfer to Entergy.
NL-02-002 01/08/02	Gas Turbine Generator Fuel Oil Storage Requirements
NL-02-003 01/08/02	Deletion of Technical Specifications for the Fuel Storage Building Air Filtration System
NL-02-004 01/08/02	Power Limits With Inoperable Steam Line Safety Valves
NL-00-147 12/11/2000	Changes to Primary to Secondary Leakage Limits and Steam Generator Tube Inservice Surveillance Requirements
NL-01-020 02/27/01	Revision of Technical Specification Applicability for Engineered Safety Systems (applicability changed from "whenever critical" to "average reactor coolant temperature above 350°F") (to be withdrawn)
NL-01-093 7/13/01	Containment Integrated Leakage Rate Testing Frequency
NL-01-110 9/20/01	Spent Fuel Storage Pit Rack Criticality Analysis with Soluble Boron Credit
NL-01-111 9/20/01	License Amendment Request for One Time Extension of Technical Specification Surveillance Intervals (2002)
Amendment 222 1/30/02	Deletion of Technical Specifications for the Post Accident Sampling System (PASS) using the Consolidated Line Item Improvement Process
Amendment 223 2/12/02	Removal of Containment Isolation Valve Lists from the Technical Specifications
Amendment 224 2/15/02	Reactor Coolant System Heatup and Cooldown Limitation Curves and Request for Exemption from the Requirements of 10CFR50.60(a) and Appendix G

ATTACHMENT 4
To NL-02-016

Environmental Assessment

Entergy Nuclear Operations Inc.
Indian Point 2
Docket No. 50-247

The Technical Specification changes resulting from the conversion from IP2 current Technical Specifications to IP2 Improved Technical Specifications based on NUREG-1431, Revision 2 "Standard Technical Specifications Westinghouse Plants," have been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(9). The following is a discussion of how the proposed Technical Specification changes meet the criteria for categorical exclusion.

10 CFR 51.22(c)(9): Although the proposed change involves changes to requirements with respect to inspections or surveillance requirements,

- (i) the proposed change involves no Significant Hazards Consideration (refer to the Significant Hazards Consideration section of this Technical Specification Change Request),
- (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite because the proposed changes do not affect the generation of any radioactive effluents nor do they affect any of the permitted release paths, and
- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Therefore, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Based on the aforementioned and pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of an amendment to the Technical Specifications incorporating the changes proposed in this request.