



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

July 10, 2002

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-02-092

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

SUBJECT: SUPPLEMENT 1 TO THE INDIAN POINT 2 LICENSE AMENDMENT
REQUEST FOR CONVERSION TO IMPROVED STANDARD
TECHNICAL SPECIFICATIONS

REFERENCE: 1) Entergy Nuclear Operations Inc. letter to NRC, NL-02-016,
"License Amendment Request (LAR 02-005) Conversion to
Improved Standard Technical Specifications," dated March
27, 2002

Dear Sir:

Pursuant to 10CFR50.90, by letter dated March 27, 2002 (Reference 1), Entergy Nuclear Operations Inc. (Entergy) proposed to amend the Indian Point 2 (IP2) Plant Operating License, Appendices A and B, "Technical Specifications" (TS) to adopt Improved Technical Specifications (ITS) based on NUREG 1431, "Standard Technical Specifications Westinghouse Plants." Reference 1 indicated that the proposed ITS amendment would be periodically supplemented, as necessary, to incorporate approved amendments to the IP2 Current Technical Specifications (CTS). The purpose of this supplement is to incorporate the following CTS Amendments:

- Amendment 222, "Deletion of Technical Specifications for the Post Accident Sampling System (PASS) using the Consolidated Line Item Improvement Process;"
- Amendment 223, "Removal of Containment Isolation Valve Lists from Technical Specifications;"
- Amendment 224, "Updated Pressure-Temperature Limit Curves;"
- Amendment 225, "One Time Extension of Technical Specification Surveillance Intervals," and;

A001

Amendment 226, "Technical Specification Changes to Secondary Leakage Limits and Steam Generator Tube Inservice Surveillance Requirements."

Additionally, this supplement eliminates the proposed relocation of CTS requirements to an IP2 Pressure/Temperature Limits Report (PTLR). As described in Reference 1, the original proposed ITS was written as though a PTLR was already approved at IP2. During the incorporation of Amendment 224, "Updated Pressure-Temperature Limit Curves," Entergy reevaluated the potential benefits of developing a PTLR at the current time. Entergy has elected to defer submittal of a PTLR until after the IP2 ITS is approved. This submittal reflects this decision by directly incorporating the technical requirements of Amendment 224 into proposed ITS 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and ITS 3.4.12, "Low Temperature Overpressure Protection (LTOP)," and deleting reference to a PTLR in other specifications that made this reference.

The incorporation of CTS Amendments 222 through 226 into the IP2 ITS submittal and the elimination of the proposed relocation of pressure/temperature requirements to a PTLR is accomplished by revising the following ITS packages (to Revision 1):

ITS 1.0, "Use and Application;"

ITS 3.4.3, "RCS Pressure and Temperature (P/T) Limits;"

ITS 3.4.6, "RCS Loops - MODE 4;"

ITS 3.4.7, "RCS Loops - MODE 5, Loops Filled;"

ITS 3.4.10, "Pressurizer Safety Valves;"

ITS 3.4.12, "Low Temperature Overpressure Protection (LTOP);"

ITS 3.4.13, "RCS Operational LEAKAGE," and;

ITS 5.6, "Reporting Requirements."

In addition to the changes to the ITS packages listed above, CTS Amendments 222 through 226 resulted in changes to CTS pages included in 64 other ITS packages. The large number of ITS packages affected is the result of the format of the original IP2 CTS that often includes multiple technical specifications on a single CTS page. Therefore, each of the amended CTS pages is typically included in more than one of the proposed ITS packages even though the CTS changes affect only one of the proposed ITS specifications.

To minimize the administrative burden of updating hard copies of ITS packages, Entergy is not currently revising those packages for which there are no changes or only minor administrative changes (i.e., deletion of a note for a one-time extension to a surveillance interval that has since expired). However, the new CTS pages and the original CTS pages affected by Amendments 222 through 226 are included with this submittal in a format that will facilitate distribution to the appropriate reviewers for verification that there is no technical impact and for incorporation into hard copies if desired. Attachment 1 is a list of the CTS pages in each ITS package affected by Amendments 222 through 226.

ITS packages will be revised to include the latest CTS Amendments if the package is revised for any other reason.

As was done by Reference 1, the material constituting this supplement to the ITS submittal is enclosed herewith on CD-ROM. The Supplement 1 CD-ROM includes the following:

- All of the information originally transmitted by Reference 1 (ITS Revision 0 Packages);
- The ITS Revision 1 Packages listed above;
- CTS pages affected by Amendments 222 through 226 sorted by ITS package order;
- A copy of this supplemental cover letter and attachments, and;
- The IP2 CTS through Amendment 226.

This supplemental 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."

As previously described, this supplement simply updates the proposed ITS of Reference 1 to reflect previously reviewed and approved CTS Amendments 222 through 226. As such, the supplement is an administrative update that is consistent with the changes that were reviewed and approved by the On Site Safety Review Committee (OSRC) (formerly the Station Nuclear Safety Committee (SNSC)) and the Safety Review committee (SRC) as part of the associated individual CTS Amendments. Similarly, a separate Safety Evaluation Report (SER) was issued with each CTS Amendment being incorporated by this supplement. Therefore, this supplement does not impact the No Significant Hazards Consideration Determination of Reference 1.

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.

Attachment 2, "List of Pending License Amendment Requests (LARs) and Approved Amendments not Reflected in Submittal and Supplement 1," shows the Amendment numbers of additional approved LARs not incorporated by this supplement and includes the additional LARs submitted since the date of Reference 1. Entergy requests

continuing processing of the proposed CTS changes in parallel with review of the ITS submittal as supplemented. Additional supplemental submittals incorporating Amendments 227, 228, 229, and other 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.

No 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) 734-5336.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Dacimo". The signature is written in a cursive style with a large initial "F".

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 submits Supplement 1 to the application for amendment converting the Indian Point Nuclear Generating Unit No. 2 Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) submitted on March 27, 2002.

Supplement 1 to the proposed ITS is set forth in the "Supplement 1-IP2 Conversion Packages" directory of the enclosed CD-ROM. Supplement 1 updates the ITS submittal to reflect approved CTS Amendments 222, 223, 224, 225, and 226 which were previously determined not to involve a significant hazard as defined in 10CFR50.92(c). Therefore, the no significant hazards consideration determination provided with the submittal dated March 27, 2002 is not impacted.

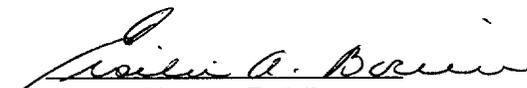
As required by 10 CFR 50.91(b)(1), a copy of this Application has been provided to the appropriate New York State official designated to receive such amendments.

BY:



Fred Dacimo
Vice President – Operations
Indian Point 2

Subscribed and sworn to
before me this 10 day
July, 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-02-092**

**List of Proposed ITS Pages Affected by CTS Amendments 222,
223, 224, 225, and 226**

ITS Package	CTS PAGES	Submittal Amendment	Effective Amendment	Annotated Amendment
1.0	1-3	152	223	223
1.0	T 1-1	204	225	225
5.4	6-5	206	222	222
5.6	6-5	206	222	222
5.6	4.13-5	201	226	226
3.1.3	3.1.C-2	155	224	224
3.1.4	T 4.1-1(2)	216	225	225
3.1.4	T 4.1-3	217	225	225
3.1.5	T 4.1-1(2)	216	225	225
3.1.6	T 4.1-1(2)	216	225	225
3.1.7	T 4.1-1(2)	216	225	225
3.1.8	3.1.C-2	155	224	224
3.3.1	T 4.1-1(1)	205	225	205*
3.3.1	T 4.1-1(2)	216	225	216*
3.3.1	T 4.1-1(4)	205	225	205*
3.3.1	T 4.1-1(8)	205	224	224
3.3.2	4.5-1	211	225	225
3.3.2	4.5-2	211	225	225
3.3.2	T 4.1-1(1)	205	225	205*
3.3.2	T 4.1-1(2)	216	225	216*
3.3.2	T 4.1-1(4)	205	225	205*
3.3.2	T 4.1-1(5)	214	225	214*
3.3.2	T 4.1-1(8)	205	224	224
3.3.3	T 4.1-1(1)	205	225	205*
3.3.3	T 4.1-1(2)	216	225	216*
3.3.3	T 4.1-1(3)	205	225	205*
3.3.3	T 4.1-1(4)	205	225	205*
3.3.3	T 4.1-1(5)	214	225	214*
3.3.3	T 4.1-1(6)	205	225	205*
3.3.3	T 4.1-1(8)	205	224	224
3.3.5	T 4.1-1(5)	214	225	214*
3.3.6	T 4.1-1(3)	205	225	205*
3.3.7	4.5-4	219	225	225
3.3.7	T 4.1-1(3)	205	225	205*

ITS Package	CTS PAGES	Submittal Amendment	Effective Amendment	Annotated Amendment
3.3.7	T 4.1-1(4)	205	225	205*
3.4.1	T 4.1-1(1)	205	225	205*
3.4.10	3.1.A-2	155	224	224
3.4.10	3.1.A-3	155	224	224
3.4.10	3.1.A-8	152	224	224
3.4.10	T 4.1-1(6)	205	225	205*
3.4.10	T 4.1-3	217	225	225
3.4.11	3.1.A-9	155	224	224
3.4.11	T 4.1-1(5)	214	225	225
3.4.11	T 4.1-1(6)	205	225	225
3.4.12	3.1.A-3	155	224	224
3.4.12	3.1.A-6	155	224	224
3.4.12	3.1.A-7	155	224	224
3.4.12	3.1.A-8	152	224	224
3.4.12	3.3-3	211	224	224
3.4.12	4.18-1	159	224	224
3.4.12	F 3.1.A-1	195	224	224
3.4.12	F 3.1.A-2	195	224	224
3.4.12	F 3.1.A-3	195	224	224
3.4.12	F 3.1.A-4	None	224	224
3.4.12	F 3.1.A-5	None	224	224
3.4.12	F 3.1.A-6	None	224	224
3.4.12	T 3.1.A-2(1)	155	224	224
3.4.12	T 3.1.A-2(2)	155	224	224
3.4.12	T 4.1-1(6)	205	225	225
3.4.12	T 4.1-1(8)	205	224	224
3.4.13	3.1.F-3	192	226	226
3.4.13	3.1.F-7	192	226	226
3.4.13	3.1.F-8	192	226	226
3.4.13	3.1.F-9	192	226	226
3.4.14	3.1.F-3	192	226	226
3.4.14	3.1.F-7	192	226	226
3.4.14	3.1.F-8	192	226	226
3.4.15	3.1.F-7	192	226	226

ITS Package	CTS PAGES	Submittal Amendment	Effective Amendment	Annotated Amendment
3.4.15	3.1.F-8	192	226	226
3.4.15	3.1.F-9	192	226	226
3.4.15	T 4.1-1(3)	205	225	205*
3.4.15	T 4.1-1(4)	205	225	205*
3.4.15	T 4.1-1(8)	205	224	224
3.4.2	3.1.C-2	155	224	224
3.4.2	T 4.1-1(1)	205	225	205*
3.4.3	3.1.B-1	195	224	224
3.4.3	3.1.B-2	195	224	224
3.4.3	3.1.B-3	195	224	224
3.4.3	3.1.B-4	195	224	224
3.4.3	3.1.B-5	195	224	224
3.4.3	3.1.B-6	195	224	224
3.4.3	3.1.B-7	195	224	224
3.4.3	4.3-1	203	224	224
3.4.3	4.3-2	195	224	224
3.4.3	F 3.1.B-1	195	224	224
3.4.3	F 3.1.B-2	195	224	224
3.4.4	3.1.A-2	155	224	224
3.4.5	3.1.A-2	155	224	224
3.4.5	T 4.1-1(2)	216	225	216*
3.4.6	3.1.A-2	155	224	224
3.4.6	T 4.1-1(2)	216	225	216*
3.4.7	3.1.A-2	155	224	224
3.4.8	3.1.A-2	155	224	224
3.4.9	3.1.A-8	152	224	224
3.4.9	3.1.C-2	155	224	224
3.4.9	T 4.1-1(1)	205	225	205*
3.5.1	3.3-12	200	224	224
3.5.1	3.3-3	211	224	224
3.5.1	T 4.1-1(4)	205	225	205*
3.5.2	3.3-12	200	224	224
3.5.2	3.3-3	211	224	224
3.5.2	4.5-1	211	225	225

ITS Package	CTS PAGES	Submittal Amendment	Effective Amendment	Annotated Amendment
3.5.2	4.5-2	211	225	225
3.5.4	3.3-12	200	224	224
3.5.4	3.3-3	211	224	224
3.5.4	T 4.1-1(2)	216	225	225
3.6.1	1-3	152	223	223
3.6.1	3.6-1	188	223	223
3.6.1	3.6-3	188(12/5/00)	223	223
3.6.1	4.4-2	204	225	225
3.6.1	4.4-4	204	225	225
3.6.10	4.4-2	204	225	225
3.6.10	4.4-7	190	223	223
3.6.2	1-3	152	223	223
3.6.2	3.6-1	188	223	223
3.6.2	4.4-3	204	225	225
3.6.2	4.4-4	204	225	225
3.6.2	4.4-7	190	223	223
3.6.3	1-3	152	223	223
3.6.3	3.6-1	188	223	223
3.6.3	3.6-3	188(12/5/00)	223	223
3.6.3	3.6-4	188	223	223
3.6.3	4.4-2	204	225	225
3.6.3	4.4-3	204	225	225
3.6.3	4.4-4	204	225	225
3.6.3	4.4-7	190	223	223
3.6.3	T 4.1-3	217	225	225
3.6.4	3.6-1	188	223	223
3.6.4	3.6-3	188(12/5/00)	223	223
3.6.4	T 4.1-1(2)	216	225	225
3.6.5	3.6-1	188	223	223
3.6.5	3.6-3	188(12/5/00)	223	223
3.6.6	3.3-3	211	224	224
3.6.6	4.5-1	211	225	225
3.6.6	4.5-2	211	225	225
3.6.7	3.3-3	211	224	224

ITS Package	CTS PAGES	Submittal Amendment	Effective Amendment	Annotated Amendment
3.6.7	4.5-1	211	225	225
3.6.8	4.5-1	211	225	225
3.6.8	4.5-11	215(6/14/01)	225	225
3.6.8	4.5-2	211	225	225
3.6.9	4.4-3	204	225	225
3.6.9	4.4-4	204	225	225
3.6.9	4.4-7	190	223	223
3.7.1	T 4.1-3	217	225	225
3.7.10	4.5-11	215(6/14/01)	225	225
3.7.10	4.5-4	219	225	225
3.8.1	4.6-1	218	225	218*
3.8.3	4.6-1	218	225	225
3.8.3	4.6-2	218	225	225
3.8.3	T 4.1-3	217	225	225
3.8.4	4.6-2	218	225	225
3.8.6	4.6-2	218	225	218*
3.9.1	3.6-1	188	223	223
3.9.2	T 4.1-1(1)	205	225	225
3.9.3	T 4.1-1(2)	216	225	225
3.9.4	T 4.1-1(2)	216	225	225
5.5.11	4.6-1	218	225	225
5.5.14	4.4-2	204	225	225
5.5.14	4.4-3	204	225	225
5.5.14	4.4-4	204	225	225
5.5.14	4.4-7	190	223	223
5.5.3	T 4.10-2(1)	198	225	225
5.5.7	4.13-1	192	226	226
5.5.7	4.13-2	201	226	226
5.5.7	4.13-3	209	226	226
5.5.7	4.13-4	201	226	226
5.5.7	4.13-5	201	226	226
5.5.7	4.13-6	201	226	226
5.5.7	4.13-7	201	226	226
5.5.8	LIC 3	220	226	226

ITS Package	CTS PAGES	Submittal Amendment	Effective Amendment	Annotated Amendment
5.5.9	4.5-1	211	225	225
5.5.9	4.5-11	215(6/14/01)	225	225
5.5.9	4.5-4	219	225	225
R.02	3.2-2	163	224	224
R.02	T 4.1-1(2)	216	225	216*
R.04	4.12-3	204	225	225
R.04	4.12-6	204	225	225
R.08	3.1.B-2	195	224	224
R.08	3.1.B-5	None	224	224
R.08	3.1.B-6	195	224	224
R.09	3.1.B-2	195	224	224
R.10	3.1.B-2	195	224	224
R.10	4.3-1	203	224	224
R.10	4.3-2	195	224	224
R.11	3.1.F-7	192	226	226
R.11	3.1.F-8	192	226	226
R.11	3.1.F-9	192	226	226
R.12	4.6-2	218	225	225
R.15	T 4.1-3	217	225	225
R.18	T 4.1-1(4)	205	225	225
R.18	T 4.1-1(8)	205	224	224
R.19	T 4.1-3	217	225	225
R.20	T 4.1-3	217	225	225
R.21	T 4.1-1(3)	205	225	225
R.27	4.5-11	215(6/14/01)	225	225
R.27	4.5-4	219	225	225

* If the annotated amendment number is marked with an asterisk, then the CTS page showing the effective amendment is included in the package for comparison with the original markup but is not annotated because there are no significant changes to this ITS package due to the latest Amendment.

**ATTACHMENT 2
to NL-02-092**

**List of Pending
License Amendment Requests and Approved Amendments not
Currently Reflected in ITS Submittal and Supplement 1**

Letter/ Amendment No. and Date	LAR/Amendment Title
NL-01-093 7/13/01	Containment Integrated Leakage Rate Testing Frequency
NL-02-001 01/08/02	License Amendment Request (LAR No. 02-001) - Delegation of Technical Specifications for Reactor Vessel Material Surveillance Program
NL-02-002 01/08/02	License Amendment Request (LAR No. 02-002) - Gas Turbine Generator Fuel Oil Storage Requirements
NL-02-025 03/28/02	License Amendment Request (LAR No. 02-006) – Relocation of the Requirements for the Gas Turbine Generators from the Indian Point Nuclear Generating Unit No. 2 Technical Specifications
NL-02-042 05/30/02	License Amendment Request (LAR-02-007) – Changes to Effectively Coordinate Indian Point Units 1 and 2 Programs
NL-02-071 05/30/02	License Amendment Request (LAR-02-009) – Regarding Changes To Facility Operating License No. DPR-26 To Reflect ENN/IPEC Reorganizations
NL-02-076 06/13/02	License Amendment Request (LAR No. 02-008) – Revision to the Steam Generator Tube Surveillance Requirements for Eddy Current Inspection Probe Diameter in the Indian Point Nuclear Generating Unit No. 2 Technical Specifications
NL-02-082 07/09/02	License Amendment Request (LAR No. 02-010) – Regarding Indian Point Energy Center, Unit No. 2 Technical Specifications Requirements for Control Rod Misalignment and Rod Position Indication.
Amendment 227 05/29/02	Credit for Soluble Boron and Burnup in Spent Fuel Pit
Amendment 228 06/04/02	Power Range Neutron Flux High Setpoint With Inoperable Main Steam Safety Valve
Amendment 229 06/05/02	Fuel Storage Building Air Filtration System