



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

October 31, 2002

Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL-02-141

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop 0-P1-17  
Washington, DC 20555-0001

**SUBJECT: Supplement to License Amendment Request (LAR-02-009)  
Regarding Administrative Changes to Technical Specifications**

**REFERENCE:** 1. ENO letter NL 02-071 to NRC; "License Amendment Request  
Regarding Changes to Facility Operating License No. DPR-26 to  
Reflect ENN/IPEC Reorganizations," dated May 30, 2002.

Dear Sir;

Entergy Nuclear Operations, Inc. (ENO) submitted a request for amendment (Reference 1) to Section 6.0. "Administrative Controls" of the Indian Point 2 (IP2) Technical Specifications. The scope of the requested amendment includes changes that are the result of the adoption of a new quality assurance (QA) program document at IP2. During a conference call with the NRC staff on August 6, 2002 ENO agreed to provide additional information regarding these proposed changes.

The Technical Specifications currently refer to the 'Quality Assurance Program Document' (QAPD), which describes the IP2 QA program. ENO has developed the 'Quality Assurance Program Manual' (QAPM) that integrates the QA programs for other nuclear power plants owned and operated by Entergy, including IP2. The QAPM has replaced the QAPD as the QA program document for IP2 and the Updated Final Safety Analysis Report (UFSAR) has been revised to reflect this change. ENO evaluated and implemented the transition from the QAPD to the QAPM in accordance with 10 CFR 50.54(a). Since the Technical Specifications currently reference the QAPD, the request for amendment includes changes to replace references to the QAPD with references to the QA program described or referenced in the UFSAR, i.e., the QAPM. The amendment request does not propose to modify the existing requirements stated in Technical Specification Section 6.0.

Attachment 1 identifies the QAPM sections that implement the QAPD requirements pertaining to the subjects that are within the scope of the proposed amendment of the Technical Specifications. This information is provided to support NRC staff review of the proposed amendment.


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The information provided in this supplement does not modify the requested changes to the Technical Specifications and does not alter the conclusions of the 'No Significant Hazards Consideration' evaluation previously provided in Reference 1.

There are no new commitments made in this letter. Should you or your staff have any questions regarding this submittal, please contact Mr. Kevin Kingsley at (914) 734-5581.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 10-31-2002

Sincerely,



Fred Dacimo  
Vice President – Operations  
Indian Point 2

Attachment 1: Additional Information Regarding Amendment Request LAR-02-009

cc: Mr. Hubert J. Miller  
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**ATTACHMENT I TO NL-02-141**  
**Additional Information Regarding Amendment Request LAR-02-009**  
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Tech Spec Section	Subject	Change Summary	Discussion
6.2.1.a	Requirement for establishing and documenting organizational relationships	<p>Change from: .... shall be documented in the QAPD</p> <p>Change to: .... shall be documented in the QA program document referenced in the UFSAR</p>	The subject requirement was stated in Section 3.2 of the QAPD. The requirement is now identified in Section A.7 (Regulatory Commitments) of the QAPM by reference to Regulatory Guide 1.33, Rev 2, which endorses ANSI N18.7-1976. ANSI N18.7 (Section 3, 'Owner Organization') contains the subject requirement.
6.5.1	Review and audit functions of the onsite and offsite review committees	Delete 6.5.1 from Tech Specs. Requirements are maintained in licensee controlled document; QAPM	The subject requirement was stated in Appendix B of the QAPD. The information is now identified in Sections A.2.f and A.7 of the QAPM. Section A.7 references Regulatory Guide 1.33, Rev 2, which endorses ANSI N18.7-1976. Table 1 of the QAPM also lists clarifications / exceptions to ANSI N18.7 so that the QAPM reflects the information as previously listed in the QAPD.
6.6	Requirement for event reporting in accordance with 10 CFR 50.73.	Remove detail regarding internal routing and review of Licensee Event Reports	The subject requirement is addressed in the QAPM by reference to Regulatory Guide 1.33, Rev 2, which endorses ANSI N18.7-1976 and as modified by clarification / exception number C.9 in Table 1 of the QAPM.
6.7	Reporting requirements for safety limit violations	Remove detail regarding internal routing and review of Safety Limit Violation Reports	The subject requirement is addressed in the QAPM by reference to Regulatory Guide 1.33, Rev 2, which endorses ANSI N18.7-1976 and as modified by clarification / exception number C.9 in Table 1 of the QAPM.

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Tech Spec Section	Subject	Change Summary	Discussion
6.8	Requirements regarding written procedures	Replace reference to QAPD with reference to the QA program, as described in the UFSAR	Section 5.2.15 of the QAPD addressed requirements regarding review, approval, and control of procedures. These requirements are addressed in the QAPM by reference to Regulatory Guide 1.33, Rev 2, which endorses ANSI N18.7-1976 and as modified by clarification / exception numbers C.14 through C.26 in Table 1 of the QAPM.
6.10	Requirements regarding record retention	Replace reference to QAPD with reference to the QA program, as described in the UFSAR	Section 5.2.12 of the QAPD addressed the subject requirements. These requirements are addressed in the QAPM by reference to Regulatory Guide 1.33, Rev 2, which endorses ANSI N18.7-1976 and by reference to Regulatory Guide 1.88, Rev 2, which endorses ANSI N 45.2.9-1974. Clarifications / exceptions are noted in items J1 through J7 of Table 1 in the QAPM.
6.14 6.15 6.16	Process Control Program Offsite Dose Calculation Manual Radioactive Waste System	Delete 'by the SNSC' from statements regarding review or acceptance of changes to these items.	As discussed for item 6.5.1, review and audit functions of SNSC were stated in Appendix B of the QAPD. The subject requirement is now addressed by the QAPM reference to Regulatory Guide 1.33, Rev 2 which endorses ANSI N18.7-1976.