



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

December 31, 2002

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-02-163

Mr. R. William Borchardt, Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
One White Flint North, 11555 Rockville Pike
Rockville, MD 20852-2738

SUBJECT: Amended Response to Notice of Violation and Proposed Imposition of Civil
Penalty

REF: NRC Inspection Report Nos. 50-247/99-08, 99-13, and 99-14, and Letter to Mr.
Borchardt from Mr. Baumstark, dated March 27, 2000

Dear Mr. Borchardt:

This letter amends our previous letter dated June 5, 2000 on the subject notice. One of the commitments in the letter dated June 5, 2000 was changed. Attachment A describes the original commitment, the revised commitment and the justification for change.

Commitments made by the Licensee in this letter are listed in Attachment B to this letter.

The amended response does not include any personal, proprietary, or safeguards information.

Should you or your staff have any questions regarding this matter, please contact Mr. John F. McCann, Manager, Licensing at (914) 734-5074.

Sincerely,

A handwritten signature in dark ink, appearing to read "Fred Dacimo", with a stylized flourish at the end.

Fred Dacimo
Vice President – Operations
Indian Point 2

Attachments

cc: Next page

IE14

cc: Document Control Desk
US Nuclear Regulator Commission
Mail Station P1-137
Washington, DC 20555

Mr. Hubert J. Miller
Regional Administrator – Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Patrick D. Milano, Senior Project Manager
Project Directorate I-1
US Nuclear Regulatory Commission
Mail Stop 0-8-2C
Washington, DC 20555

Mr. John L. Minns, Project Manager
Division of Reactor Program Management
US Nuclear Regulatory Commission
Mail Stop 10-D4
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

ATTACHMENT TO NL-02-163
Change to Regulatory Commitment

ATTACHMENT A

ORIGINAL COMMITMENT

The original commitment stated: Update and/or develop design basis documents to include current design and licensing basis information. Due date 12/31/02.

REVISION/JUSTIFICATION

The revised commitment now states: Update/create Design Basis documents for AC Power, Fire Protection, Cable Separation. Due date 12/31/03.

The justification for change is: Under the Design Basis Initiative, upgrade work is being done on the electrical and fire protection areas. It is more logical to upgrade/create the design documents for these areas after the basis itself is upgraded. Therefore this work will be performed in 2003 after the basis work is complete.

The commitment is a defense in depth approach to human errors. Improving the design basis, training, Corrective action program and error reduction techniques such as questioning attitude and peer checks are all designed to improve human performance and remove any negative impacts on overall safety of the plant. Improvements in design basis itself are ongoing and the design basis document is just one of the tools used. The basis itself is being upgraded now. This revised scheduled to prepare this reference document with the overall basis improvement is appropriate and will not diminish the plant's capabilities to understand and assure performance of all safety functions.

ATTACHMENT TO NL-02-163
Summary of Change to Regulatory Commitment

ATTACHMENT B

Entergy ---Indian Point 2
Commitment

The following identifies the action committed to by Entergy in this document. Any other actions discussed in the submittal represent intended or planned actions by Entergy and are described to the NRC herein for the NRC's information and are not regulatory commitments.

Commitment	Due Date
Update/create Design Basis documents for AC power, Fire Protection, Cable Separation.	12/31/2003