



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Entergy Nuclear Indian Point 2, LLC
P. O. Box 249
Buchanan, NY 10511

June 26, 2003

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-03-107

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

SUBJECT: Supplement 4 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications

- References:**
- 1) Entergy letter (NL-02-016) to NRC, "License Amendment Request (LAR 02-005) Conversion to Improved Standard Technical Specifications," dated March 27, 2002
 - 2) Entergy letter (NL-02-092) to NRC, "Supplement 1 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications," dated July 10, 2002
 - 3) Entergy letter (NL-03-035) to NRC, "Supplement 2 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications," dated February 26, 2003
 - 4) Entergy letter (NL-03-081) to NRC, "Supplement 3 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications," dated May 19, 2003
 - 5) Entergy letter (NL-03-103) to NRC, "Response to Request for Additional Information Regarding Section 3.7, Plant Systems, of the Improved Technical Specifications (ITS) (TAC No. MB4739)," dated June 23, 2003
 - 6) Staff Requests for Additional Information regarding References 1, 2, 3, and 4, and associated Entergy responses (see Attachment 2)

Dear Sir:

By letter dated March 27, 2002 (Reference 1), as supplemented by letters dated July 10, 2002, February 26, 2003, and May 19, 2003 (References 2, 3, and 4 respectively), Entergy Nuclear Operations, Inc. (Entergy) requested to amend the Indian Point 2 (IP2) Plant Operating License, Appendices A and B, "Technical Specifications." The proposed amendment converts the IP2 Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) in accordance with NUREG 1431, "Standard Technical Specifications—Westinghouse Plants," Rev. 2. References 1, 2, 3, and 4

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indicated that the proposed ITS amendment would be periodically supplemented, as necessary, to incorporate approved amendments to the CTS. In addition, Entergy has made changes in response to Requests for Additional Information (RAIs) from the Nuclear Regulatory Commission (NRC) staff. The purpose of this supplement is to incorporate changes required by RAI responses, Technical Specification Task Force (TSTF) Travelers 370, 358, 359 and 438, and CTS Amendment 237, "1.4 Percent Power Uprate," dated May 22, 2003.

Attachment 1 to this supplement provides an index of the ITS sections that are affected by incorporation of Amendment 237 and revisions due to incorporation of previously submitted RAI responses.

Attachment 2, "Correspondence History of Responses to Requests for Additional Information," provides a list of staff RAIs and the corresponding Entergy responses. These letters described the changes that were made to the proposed ITS. To facilitate staff review, Entergy is attaching the RAIs and responses to each affected section of this supplement.

Attachment 3, "List of Pending License Amendment Requests (LARs) not Reflected in ITS Submittal and Supplements," shows amendment requests currently under review by the NRC staff. Entergy requests continued processing of the proposed LARs in parallel with the review of the ITS submittal as supplemented. Additional supplemental submittals incorporating these LARs, when approved, 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.

As was done with References 1, 2, 3, and 4, the material constituting Supplement 4 to the ITS submittal is enclosed herewith on CD-ROM. The Supplement 4 CD-ROM includes the following:

- All the information originally transmitted by References 1, 2, 3, and 4;
- A copy of this supplemental cover letter and attachments; and
- The IP2 CTS through Amendment 237.

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 updates the proposed ITS of References 1, 2, 3, and 4 to reflect previously reviewed and approved CTS Amendments. As such, a separate Safety Evaluation Report (SER) was issued with each CTS Amendment being incorporated by this supplement. Therefore, for the approved Amendments, this supplement has no impact on the determination of no significant hazards consideration of References 1, 2, 3, and 4. The RAI responses have, in some cases, resulted in new or revised no significant hazards determination evaluations and these revised evaluations have been included with the associated specification packages. However,

this supplement has not changed the conclusion that the conversion of the Indian Point 2 Technical Specifications to Improved Technical Specifications involves no significant hazards consideration as defined by 10 CFR 50.92.

As indicated in Entergy's letter dated June 23, 2003 (Reference 5), our planned implementation date for the ITS amendment is October 16, 2003. Therefore, Entergy respectfully requests an approved Safety Evaluation Report (SER) in time to support the indicated implementation date.

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.

There are no commitments contained in this letter.

Should you or your staff have any questions regarding this matter, please contact me at (914) 734-5336.

Sincerely,



William S. Blair
IP2 ITS Project Manager

Enclosure
Attachments

cc: see page 4

cc: (w/o enclosure)

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ATTACHMENT 1 TO NL-03-107

**List of Sections Affected by CTS Amendment 237 and
Incorporation of RAI responses**

Revised Supplement 4 Sections

1.0 – Rev. 2, Supp. 4
2.0 – Rev. 2, Supp. 4
3.0 – Rev. 1, Supp. 4
3.1.3 – Rev. 2, Supp. 4
3.1.4 – Rev. 2, Supp. 4
3.1.5 – Rev. 2, Supp. 4
3.1.8 – Rev. 2, Supp. 4
3.2.1 – Rev. 2, Supp. 4
3.2.4 – Rev. 2, Supp. 4
3.4.1 – Rev. 2, Supp. 4
3.4.3 – Rev. 3, Supp. 4
3.4.4 – Rev. 2, Supp. 4
3.4.5 – Rev. 2, Supp. 4
3.4.6 – Rev. 3, Supp. 4
3.4.7 – Rev. 3, Supp. 4
3.4.8 – Rev. 2, Supp. 4
3.4.10 – Rev. 3, Supp. 4
3.4.11 – Rev. 2, Supp. 4
3.4.12 – Rev. 3, Supp. 4
3.4.13 – Rev. 3, Supp. 4
3.4.14 – Rev. 2, Supp. 4
3.4.15 – Rev. 2, Supp. 4
3.4.16 – Rev. 2, Supp. 4
3.5.1 – Rev. 2, Supp. 4
3.5.2 – Rev. 2, Supp. 4
3.5.3 – Rev. 2, Supp. 4
3.6.1 – Rev. 2, Supp. 4
3.6.2 – Rev. 2, Supp. 4
3.6.3 – Rev. 2, Supp. 4

Revised Supplement 4 Sections

3.6.4 – Rev. 2, Supp. 4
3.6.8 – Rev. 2, Supp. 4
3.6.9 – Rev. 2, Supp. 4
3.6.10 – Rev. 2, Supp. 4
3.7.1 – Rev. 2, Supp. 4
3.7.2 - Rev. 1 Supp. 4
3.7.3 - Rev. 1 Supp. 4
3.7.4 - Rev. 1 Supp. 4
3.7.5 – Rev. 2, Supp. 4
3.7.6 – Rev. 2, Supp. 4
3.7.7 - Rev. 1 Supp. 4
3.7.8 – Rev. 2, Supp. 4
3.7.10 – Rev. 2, Supp. 4
3.7.11 – Rev. 2, Supp. 4
3.7.13 - Rev. 2, Supp. 4
3.8.1 – Rev. 2, Supp. 4
3.8.2 – Rev. 1, Supp. 4
3.8.3 – Rev. 2, Supp. 4
3.8.4 – Rev. 2, Supp. 4
3.8.5 – Rev. 1, Supp. 4
3.8.6 – Rev. 2, Supp. 4
3.8.8 – Rev. 1, Supp. 4
3.8.10 – Rev. 1, Supp. 4
3.9.3 – Rev. 2, Supp. 4
3.9.4 – Rev. 2, Supp. 4
3.9.5 – Rev. 2, Supp. 4
5.6 – Rev. 3, Supp. 4
R.24 – Rev. 2, Supp. 4
R.28 – Rev. 2, Supp. 4

ATTACHMENT 2 TO NL-03-107

Correspondence History of Responses to Requests for Additional Information

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

- 1) **RAI:** NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS) (TAC No. MB4739)," dated August 6, 2002
Response: Entergy letter (NL-02-130) to NRC, "Response to Request for Additional Information Regarding Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS)," dated October 10, 2002

- 2) **RAI:** NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS) (TAC No. MB4739)," dated August 6, 2002
Response: Entergy letter (NL-02-133) to NRC, "Response to Request for Additional Information Regarding Section 5.5.14 of the Improved Technical Specifications (ITS)," dated October 28, 2002

- 3) **RAI:** NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.5.3 – Emergency Core Cooling System (ECCS) – Shutdown - The Improved Technical Specifications Beyond Scope Issue No. 1 (TAC No. MB5062)," dated September 26, 2002
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.8.3 – Diesel Fuel Oil and Starting Air - Beyond Scope Issue No. 8 (TAC No. MB5069)," dated October 3, 2002
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.7.8 – Service Water System - Beyond Scope Issue No. 6 (TAC No. MB5067)," dated October 10, 2002
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Beyond Scope Issue No. 9, ITS Section 3.8.4 DC Sources - Operating (TAC No. MB5070)," dated October 17, 2002
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Comments and Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Beyond Scope Issues (BSI)-S1, BSI-S2, BSI-S3, BSI-S4, BSI-S5 and BSI-S6 (TAC Nos. MB6394, MB6395, MB6396, MB6397, MB6398, and MB6399)," dated October 17, 2002
Response: Entergy letter (NL-02-148) to NRC, "Response to Request for Additional Information Regarding Sections 3.3.1, 3.5.3, 3.7.8, 3.8.3, 3.8.4, and 3.8.6 of the Improved Technical Specifications (ITS)," dated November 26, 2002

- 4) **RAI:** NRC letter to Entergy Nuclear Operations, Inc., "Indian Point Nuclear Generating Unit No. 2 – Comments and Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Sections 1.0, 2.0, 3.0, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.9, 4.0, and 5.0 (TAC No. MB4739)," dated October 22, 2002
Response: Entergy letter (NL-02-160) to NRC, "Response to Request for Additional Information Regarding Sections 1.0, 2.0, 3.0, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.9, 4.0, and 5.0 of the Improved Technical Specifications (ITS)," dated December 18, 2002
- 5) **RAI:** NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.8.1 – AC Sources Operating – Beyond Scope Issue No. 7 (TAC No. MB5068)," dated December 31, 2002
Response: Entergy letter (NL-03-002) to NRC, "Response to Request for Additional Information Regarding Section 3.8.1, AC Sources Operating, of the Improved Technical Specifications (ITS)," dated January 27, 2003
- 6) **RAI:** NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Sections: 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation; ITS 3.3.3, Post Accident Monitoring Instrumentation; 3.3.4, Remote Shutdown Instrumentation; 3.3.5, Loss of Power Diesel Generator (LOP-DG) Start Instrumentation; 3.3.6, Containment Purge and Exhaust Isolation Instrumentation; 3.3.7 Control Room Ventilation System (CRVS) Actuation Instrumentation (TAC No. MB4739)," dated January 22, 2003
Response: Entergy letter (NL-03-052) to NRC, "Response to Request for Additional Information Regarding Section 3.3, Instrumentation, of the Improved Technical Specifications (ITS)," dated April 8, 2003
- 7) **RAI:** NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.7 – Plant Systems (TAC No. MB4739)," dated May 16, 2003
Response: Entergy letter (NL-03-103) to NRC, "Response to Request for Additional Information Regarding Section 3.7, Plant Systems, of the Improved Technical Specifications (ITS)," dated June 23, 2003

ATTACHMENT 3 TO NL-03-107

**List of Pending License Amendment Requests (LARs) not Reflected in ITS
Submittal and Supplements**

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

Letter No. and Date	LAR Title
NL-02-042 05/30/02	License Amendment Request (LAR-02-007) – Changes to Effectively Coordinate Indian Point Units 1 and 2 Programs