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Fred Dacimo Vice President, Operations

July 31, 2003

Re:

Indian Point Unit No. 2

Docket No. 50-247

NL-03-126

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station 0-PI-17 Washington, DC 20555-0001

Subject:

Period Summary Report of NRC Regulatory Commitment

Changes at Indian Point Unit 2

Reference:

1) NEI 99-04 Revision 0, "Guidelines for Managing NRC

Commitment Changes"

2) NRC Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff"

In accordance with the Nuclear Energy Institute "Guidelines for Managing NRC Commitment Changes," NEI 99-04 Rev. 0, as addressed in NRC Regulatory Issue Summary 2000-17 guidelines, Entergy Nuclear Operations, Inc. (Entergy) hereby submits the attached periodic summary report of changes to regulatory commitments. Two commitments were revised during the last annual reporting period. The guidelines contained in NEI 99-04 were utilized in preparing the attachment.

The commitment changes made by Entergy are contained in Attachment 1 to this letter.

There are no new commitments contained in this letter.

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

Sincerely,

Fred R. Dacimo

Vice President, Operations Indian Point Energy Center

Attachment

cc:

see next page

ADOI

cc: Mr. Hubert J. Miller
Regional Administrator – Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1498

Mr. Patrick D. Milano, Senior Project Manager Project Directorate I-1 U.S. Nuclear Regulatory Commission Mail Stop 0-8-C2 Washington, DC 20555-001

Senior Resident Inspector's Office U.S. Nuclear Regulatory Commission Indian Point Unit 2 P.O. Box 38 Buchanan, NY 10511-0308

Attachment 1 NL-03-126 Page 1 of 2

ATTACHMENT 1 TO NL-03-126
Period Summary Report for Changes to Regulatory Commitments

#### **ATTACHMENT 1**

### **COMMITMENT 2002-01**

The original commitment stated: Continuation of the SSFA program with at least one SSFA to be performed per year.

# **REVOCATION/JUSTIFICATION**

The justification of revocation is: The NRC requested information regarding how Indian Point 2 is complying with the 50.54f Design Basis regulation in a letter submitted to Mr. McGrath on 10/9/96. This letter listed approx. 5 separate questions that addressed how Indian Point 2 ensures the plant is operated within the design and licensing basis. Question #3 specifically asks what rationale does the licensee use to know that their systems, structures, and components are operated in accordance with the design basis. We responded to this question in the letter NL-97-016 under section 3.3 under how we control our design changes, assessments, walk downs, and additional initiatives. Under the assessment areas we discussed the commitment to complete one SSFA per year.

IP2 has currently completed 27 SSFA and 2 SSFI's, developed 24 Design Basis Documents, reviewed each statement in the UFSAR, and developed electronic databases to cover design basis information. IP2 has conducted training in the use of the electronic databases for the plant staff. IP2 has developed a project for reconstituting the design basis of the plant through the design basis initiatives project.

#### **COMMITMENT 2002-02**

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

## REVISIONJUSTIFICATION

The revised commitment states: Update/create Design Basis documents for AC power, Fire Protection, Cable Separation due date 12/31/2003.

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 basis documents for these areas after the basis itself is upgraded. Therefore this work will be performed in 2003 after the basis work is complete.

This information was included in a letter sent to the NRC from Entergy dated December 31, 2002.