



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

August 6, 2003

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-03-127

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Station O-P1-17
Washington, DC 20555-0001

SUBJECT: Supplement 6 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-03-107) to NRC, "Supplement 4 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications," dated June 26, 2003
 - 6) Entergy letter (NL-03-116) to NRC, "Supplement 5 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications," dated July 15, 2003

Dear Sir:

By letter dated March 27, 2002 (Reference 1), as supplemented by letters dated July 10, 2002, February 26, 2003, May 19, 2003, June 26, 2003, and July 15, 2003 (References 2, 3, 4, 5, and 6 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

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Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) in accordance with NUREG 1431, "Standard Technical Specifications—Westinghouse Plants," Rev. 2.

This letter supplements References 1 through 6 to reflect the results of extensive discussions with the staff regarding mitigating systems and decay times associated with fuel handling accidents. Specifically, Entergy is maintaining Technical Specification requirements for systems that mitigate consequences of fuel handling accidents in a manner consistent with NUREG 1431 (as amended by Technical Specification Task Force Traveler 51) and is relocating the specific value for the time that fuel assemblies must decay before the mitigating systems are no longer required. The decay time is relocated to documents that are subject to the requirements of 10 CFR 50.59, "Changes, tests and experiments." Attachment 1 to this supplement provides an index of the ITS sections that are affected by incorporation of these changes.

The no significant hazards determination included with References 1 through 6 has also been revised to reflect the changes described above. These changes have not affected 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.

For your information and use in evaluating this supplement, Attachment 2, "Correspondence History of Responses to Requests for Additional Information," provides a list of staff Requests for Additional Information (RAIs) and the corresponding Entergy responses related to the proposed conversion to ITS.

Attachment 3, "List of Pending License Amendment Requests (LARs) not Reflected in ITS Submittal and Supplements," lists an outstanding Unit 1 amendment request currently under review by the NRC staff. The amendment request revises Unit 1 Provisional Operating License No. DPR-5 to properly reflect the proposed Unit 2 ITS. Approval of the amendment to DPR-5 is necessary to implement the proposed Unit 2 ITS, but will not require an additional supplement to the proposed ITS. There are no outstanding CTS amendments for Unit 2, and Entergy does not anticipate the submittal of any LARs that would require review and approval prior to ITS implementation.

As was done with References 1, 2, 3, 4, 5, and 6, the material constituting Supplement 6 to the ITS submittal is enclosed herewith on CD-ROM. The Supplement 6 CD-ROM includes the following:

- **All the information originally transmitted by References 1, 2, 3, 4, 5, and 6;**
- **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."

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,

A handwritten signature in black ink, appearing to read 'W.S. Blair', with a stylized flourish at the end.

William S. Blair
IP2 ITS Project Manager

Enclosure
Attachments

cc: see page 4

cc: (w/o enclosure)

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, Project Manager
Project Directorate I
Division Of Reactor Projects I / II
U.S. Nuclear Regulatory Commission
Mail Stop O-8-C2
Washington, DC 20555-0001

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

Mayor, Village of Buchanan
236 Tate Avenue
Buchanan, NY 10511

Mr. Paul Eddy
State of New York Public Service Commission
3 Empire Plaza
Albany, NY 12223-1350

Mr. William M. Flynn, President
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, New York 12203-6399

ATTACHMENT 1 TO NL-03-127
List of Sections Included In Supplement 6

Entergy Nuclear Operations, Inc.
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Revised Supplement 6 Sections

- 3.3.6 – Rev. 3, Supp. 6
- 3.3.7 – Rev. 3, Supp. 6
- 3.6.1 – Rev. 3, Supp. 6
- 3.6.2 – Rev. 3, Supp. 6
- 3.6.3 – Rev. 3, Supp. 6
- 3.6.6 – Rev. 2, Supp. 6
- 3.7.10 – Rev. 3, Supp. 6
- 3.8.2 – Rev. 3, Supp. 6
- 3.8.5 – Rev. 3, Supp. 6
- 3.8.8 – Rev. 3, Supp. 6
- 3.8.10 – Rev. 3, Supp. 6
- 3.9.3 – Rev. 3, Supp. 6
- R.24 – Rev. 3, Supp. 6
- R.28 – Rev. 3, Supp. 6

ATTACHMENT 2 TO NL-03-127

Correspondence History of Responses to Requests for Additional Information

**Entergy Nuclear Operations, Inc.
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- 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-03-127

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

**Entergy Nuclear Operations, Inc.
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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