



**Entergy Nuclear Northeast**  
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July 30, 2004

Indian Point Unit Nos. 2 and 3  
Docket Nos. 50-247 and 50-286  
NL-04-093

Mr. Richard J. Conte  
Chief, Operational Safety Branch  
Division of Reactor Safety – Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
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Subject: Justification of Six-Month On-site Experience for Licensed Operator  
Qualification for Indian Point Energy Center

- References:
- 1) ACAD 00-003 Revision 1, Guidelines for Initial Training and Qualification of Licensed Operators
  - 2) ANSI/ANS-3.1-1978, American National Standard for Selection and Training Of Nuclear Power Plant Personnel
  - 3) Regulatory Guide 1.8 Revision 3, Qualification and Training of Personnel for Nuclear Power Plants
  - 4) Regulatory Issue Summary 01-001, Eligibility of Operator License Applicants
  - 5) Information Notice No. 98-37, Eligibility of Operator License Applicants
  - 6) NUREG-1021 Draft Revision 9, Operator Licensing Examination Standards for Power Reactors
  - 7) Examination Standard-202, Frequently Asked Questions About Operator Licensing Program, NRC Website ([www.nrc.gov/reactors/operator-licensing/faq.html#ES-202](http://www.nrc.gov/reactors/operator-licensing/faq.html#ES-202))

Dear Sir:

Indian Point Energy Center (IPEC) is committed to ANSI-3.1 1978. Section 4.3.1 of ANSI 3.1 states, "At least six months of the nuclear power plant experience shall be at the plant of which he seeks a license unless such experience is acquired on a similar unit." This requirement is also discussed in several additional documents listed under the reference section. The six months can be in any of several positions as outlined in Reference 1.

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The Entergy Corporation recently purchased Indian Point Unit 2 (IP2) and Indian Point Unit 3 (IP3). Although some individuals are still assigned to specific units, the majority of the staff is assigned responsibilities for both units. It is our belief that IP2 and IP3 are similar units as referred to in ANSI 3.1. This conclusion was reached based upon a systematic review as discussed below.

In an effort to integrate the units and streamline production, several processes have been combined. Some of these processes have been changed to Entergy Corporation, Entergy Nuclear Northeast, and/or IPEC station procedures/expectations. Even though IP2 and IP3 maintain separate licenses, these common practices are the same. In obtaining the six-month experience, a staff member or any individual assigned to the various departments/positions will use these processes. In fact, other than the on-watch personnel engaged in licensed and non-licensed duties at the station, there is little or no difference in the processes used regardless of the unit involved.

IPEC has undertaken an aggressive integration plan, now in its final stages, to combine the two units. Staff members are now responsible for activities for both units. Engineering, Maintenance, Health Physics, Chemistry, Security, Licensing, Corrective Action, Operations Staff, Operations Procedure Group, Training, Human Resources, Finance, Purchasing, Accounting, Outage Planning, Safety, Quality Assurance, Information Technology, Records and Documents, Administrative Services, Facilities, Emergency Planning, and Work Control are now IPEC Departments. The site Fire Brigade and the Emergency Response Organization now have members from both units. Non-licensed and licensed operators are also trained to perform selected cross unit activities.

Examples of processes that are combined include:

- IPEC Site Management Manual Process
- IPEC Implementing Procedure Preparation, Review, and Approval
- Distribution of Controlled Documents
- IPEC Procedure Writing Manual
- Records Management Program
- All Emergency Plan Procedures
- IPEC Fire Protection Program Plan
- Preventive Maintenance Program
- Check Valve Reliability Program
- Surveillance Test Program
- Process for Control of Indian Point 1

- Inservice Inspection /Test Program
- IPEC Spill/Release Response Plan
- Waste Management Program
- Pre-job Briefing and Post Job Critiques
- Electrical Safety
- Electrical Safety Program
- Exposure Control Plan for Bloodborne Pathogens
- Corrective Action Review Board
- Operating License Amendments
- Notice of Enforcement Discretion
- Event Notification and Reporting
- Notices, Instructions and Reports to Workers: Inspection and Investigations
- NRC Commitment Management Program
- Technical Specification Bases, Technical Requirements Manual and Updated Final Safety Analysis Report (UFSAR) Amendment Preparation and Control
- Performance Indicator Preparation Process
- Operational Decision-Making Issues (ODMI) Process
- New York Public Service Commission Notifications and Document Transmittals
- IPEC Trending Process
- Site Communications
- IPEC Troubleshooting and Repair
- IPEC Calibration and Control of Measuring and Test Equipment (MTE)
- Housekeeping Policy
- FIN (Fix It Now)
- Fuel Assembly Receipt Inspection
- Reactivity Management Program
- Offsite Power Continuous Monitoring and Notification
- Post Transient Evaluation
- Plant Labeling Program
- Outage Management
- Startup Management
- Project Funding Policy
- Quality Assurance Functional Area Evaluation
- Temporary Shielding Program
- Radiation Exposure Guidelines
- ALARA Program

- Guidelines for Response to Acts Involving Tampering/Sabotage Directed Against Plant Equipment
- In and Out-Processing
- Multiple Training Program for Maintenance, Operations and ESP
- Work Control Process
- Planning
- Rapid Response
- Contingency Planning

In conclusion, the processes used at IPEC are, for the most part, not unit-specific. IPEC is proposing that any individual assigned to either unit routinely interfaces with these processes and therefore obtains the same level of experience. This experience should therefore be credited for the six-month on-site requirement.

We look forward to hearing your comments on this justification, and respectfully request a response by August 31, 2004. Should you or your staff have any questions regarding this matter, please contact Mr. Patric W. Conroy, Manager, Licensing at (914) 734-6668.

There are no commitments contained in this letter.

Sincerely,



Patric W. Conroy  
Manager, Licensing  
Indian Point Energy Center

cc: see page 5

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