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Fred Dacimo
Site Vice President
Administration

July 12, 2005
Indian Point Unit No. 2
Docket Nos. 50-247
NL-05-084

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

Subject: Response to the Preliminary White Finding AV 05000247/2005006-02 (Failure to Adequately Evaluate and Correct Nitrogen Gas Migration and Accumulation in Portions of the Safety Injection System) - NRC Inspection Report 05000247/2005006

Reference: NRC Inspection Report 05000247/2005006 Preliminary White Finding dated June 17, 2005

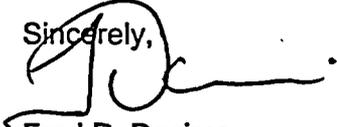
Dear Sir:

This letter provides a written response to the subject apparent violation as requested in the referenced inspection report. As verbally discussed with NRC Staff on 06/23/05, Entergy has decided not to request a regulatory conference regarding the subject apparent violation. The written response provided in this letter summarizes Entergy's position on the issue.

Based upon the evaluations performed by Entergy and discussed with NRC associated with the gas found in the common SI pump suction piping, Entergy believes that the 21 and 22 Safety Injection (SI) pumps remained operable throughout the time-frame during which the nitrogen gas migration and accumulation was occurring and leading up to the discovery and venting of the gas on January 26, 2005. Entergy does acknowledge that there are uncertainties involved with predicting the performance of the SI pumps in this time period (e.g., quantifying the amount of nitrogen gas present, evaluating its effect upon the pump operation including the ability of the pumps to purge the gas, etc.) To definitively prove past pump operability would require modeling or actual pump testing which represents a significant resource expenditure that Entergy believes can be put to better use in supporting continuous improvements at Indian Point Energy Center. For these reasons and in light of the fact that this issue did not represent a significant increase in risk, Entergy has decided to accept the results of the inspection as presently characterized.

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Entergy would also like to recognize the hard work performed by the various NRC inspectors in evaluating this technically challenging issue and understands the basis of the preliminary conclusion reached by the inspectors as it relates to the characterization of this issue and the uncertainties involved.

Sincerely,

Fred R. Dacimo
Site Vice President
Indian Point Energy Center

Attachment: None

cc:

Mr. Samuel J. Collins
Regional Administrator – Region I
U.S. Nuclear Regulatory Commission

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
Indian Point Unit 2

Mr. Paul Eddy
State of New York Public Service Commission