

May 2, 2006

Mr. Michael R. Kansler
President
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3 - AUDIT OF
THE LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS
(TAC NOS. MD0295 AND MD0296)

Dear Mr. Kansler:

The Nuclear Regulatory Commission (NRC) staff performed an audit of the Indian Point Nuclear Generating Unit Nos. 2 & 3 (IP2 & 3) commitment management program at Entergy's office at IP2 & 3 in Buchanan, New York, on March 29, 2006. The Entergy commitment management system is described in the Entergy corporate procedure EN-LI-110, "Commitment Management Program," Rev. 0, dated September 27, 2005. EN-LI-110 is based on and implements the recommendations of Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," Rev. 0. NRC Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made By Power Reactor Licensees to the NRC Staff" describes NEI 99-04 as an acceptable way for licensees to control regulatory commitments. The Office of Nuclear Reactor Regulation's Office Instruction LIC-105, Revision 1, "Managing Regulatory Commitments Made by Licensees to the NRC," provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments. LIC-105 specifies that once every 3 years, the NRC staff shall audit a licensee's commitment management program.

The NRC staff concludes that, based on the audit (1) Entergy has implemented NRC commitments for IP2 & 3 on a timely basis; and (2) Entergy has implemented an effective program for managing NRC commitment changes at IP2 & 3. Details of the audit are set forth in the enclosed audit report.

Sincerely,

/RA/

John Boska, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 & 50-286

Enclosure:
As stated

cc w/encl: See next page

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NAME	JBoska	SLittle	RLaufer
DATE	4/26/06	5/01/06	5/02/06

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Indian Point Nuclear Generating Unit Nos. 2 & 3

cc:

Mr. Gary J. Taylor
Chief Executive Officer
Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213

Mr. John T. Herron
Senior Vice President and
Chief Operating Officer
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. Fred R. Dacimo
Site Vice President
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
P.O. Box 249
Buchanan, NY 10511-0249

Mr. Paul Rubin
General Manager, Plant Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 2
P.O. Box 249
Buchanan, NY 10511-0249

Mr. Oscar Limpias
Vice President Engineering
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. Brian O'Grady
Vice President, Operations Support
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. John F. McCann
Director, Licensing
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Ms. Charlene D. Faison
Manager, Licensing
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. Michael J. Columb
Director of Oversight
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Mr. James Comiotes
Director, Nuclear Safety Assurance
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
P.O. Box 249
Buchanan, NY 10511-0249

Mr. Patric Conroy
Manager, Licensing
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
P. O. Box 249
Buchanan, NY 10511-0249

Mr. Travis C. McCullough
Assistant General Counsel
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

Ms. Stacey Lousteau
Treasury Department
Entergy Services, Inc.
639 Loyola Avenue
Mail Stop: L-ENT-15E
New Orleans, LA 70113

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Indian Point Nuclear Generating Unit Nos. 2 & 3

cc:

Senior Resident Inspector's Office
Indian Point 2
U. S. Nuclear Regulatory Commission
P.O. Box 59
Buchanan, NY 10511

Senior Resident Inspector's Office
Indian Point 3
U. S. Nuclear Regulatory Commission
P.O. Box 59
Buchanan, NY 10511

Mr. Peter R. Smith, President
New York State Energy, Research, and
Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Mr. Paul Eddy
Electric Division
New York State Department
of Public Service
3 Empire State Plaza, 10th Floor
Albany, NY 12223

Mr. Charles Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, NY 10271

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

Mr. Ray Albanese
Executive Chair
Four County Nuclear Safety Committee
Westchester County Fire Training Center
4 Dana Road
Valhalla, NY 10592

Mr. William DiProffio
PWR SRC Consultant
139 Depot Road
East Kingston, NH 03827

Mr. Daniel C. Poole
PWR SRC Consultant
P.O. Box 579
Inglis, FL 34449

Mr. William T. Russell
PWR SRC Consultant
400 Plantation Lane
Stevensville, MD 21666-3232

Mr. Jim Riccio
Greenpeace
702 H Street, NW
Suite 300
Washington, DC 20001

Mr. Phillip Musegaas
Riverkeeper, Inc.
828 South Broadway
Tarrytown, NY 10591

Mr. Mark Jacobs
IPSEC
46 Highland Drive
Garrison, NY 10524

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REGULATORY COMMITMENTS MADE BY THE LICENSEE TO

THE NUCLEAR REGULATORY COMMISSION

INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 & 3

DOCKET NOS. 50-247 AND 50-286

1.0 INTRODUCTION AND BACKGROUND

The Nuclear Regulatory Commission (NRC) staff performed an audit of the Indian Point Nuclear Generating Unit Nos. 2 & 3 (IP2 & 3) commitment management program at Entergy's office at IP2 & 3 in Buchanan, New York, on March 29, 2006. The Entergy commitment management system is described in the Entergy corporate procedure EN-LI-110, "Commitment Management Program," Rev. 0, dated September 27, 2005. EN-LI-110 is based on and implements the recommendations of Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes," Rev. 0. NRC Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made By Power Reactor Licensees to the NRC Staff" describes NEI 99-04 as an acceptable way for licensees to control regulatory commitments. The Office of Nuclear Reactor Regulation's (NRR's) Office Instruction LIC-105, Revision 1, "Managing Regulatory Commitments Made by Licensees to the NRC," provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments. LIC-105 specifies that once every 3 years, the NRC staff shall audit a licensee's commitment management program. LIC-105 is publicly available electronically from the Agencywide Documents Access and Management Systems (ADAMS) Public Electronic Reading Room on the Internet at the NRC web site www.nrc.gov (Accession Number ML042320463).

According to LIC-105, which cites the definition from NEI-99-04, a "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. LIC-105 further directs the NRR Project Manager to "audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.)."

2.0 AUDIT PROCEDURE AND RESULTS

The audit was performed at Entergy's office at IP2 & 3 in Buchanan, New York, on March 29, 2006, and reviewed commitments made by Entergy in the past 3 years.

Enclosure

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing actions/activities in accordance with the NRC guidance and approved plant procedures. For commitments that had not yet been implemented, the NRC staff aimed to ascertain that they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

Before the audit, the NRC staff searched ADAMS for a sampling of the licensee's licensing actions dated within the past 3 years. NRC staff identified documents containing regulatory commitments meeting the criteria specified by LIC-105. Table 1 lists the licensee's commitments which were audited.

The list of the selected regulatory commitments for IP2 & 3 was provided to the site licensing group with a request to provide plant documentation used to track each individual commitment. Also, the site personnel were requested to provide status and a copy of the revised documents (plant procedures, Updated Final Safety Analysis Report, Technical Specifications (TSs), etc.) for verification, if the required actions had already been completed. The regulatory commitments were reviewed against the plant documents to verify if the commitment had been implemented satisfactorily in accordance with the approved plant procedures.

LIC-105 limits the audit of commitments to those made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Accordingly, the audit excludes the following types of commitments:

- (1) Commitments as a result of Licensee Event Reports (LER)s - These commitments are controlled by the licensee's LER process, which is imposed by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.73.
- (2) Commitments made on the licensee's own initiative among internal organizational components.
- (3) Commitments that pertain to milestones of licensing actions or activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action or activity was completed.
- (4) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, TSs, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The NRC staff reviewed the commitments listed in Table 1 to ensure that the selected commitments are included in the plant database used to track the commitments and evaluate the status of completion of each commitment. The NRC staff found that the licensee's

commitment tracking program had captured the regulatory commitments that were identified by the NRC staff before the audit.

The NRC staff also reviewed plant procedures and other design bases documents that had been revised as a result of commitments made by the licensee to NRC. These procedures and documents are identified in the right-hand column of Table 1. The NRC staff review indicated that:

1. All the regulatory commitments selected for the audit were being tracked. However, it was noted the plant databases (one database is for Units 1 and 2, the other for Unit 3) did not usually list the procedure which implemented the commitment. This can make it more difficult to determine if a commitment is still in effect.
2. For some commitments which were known to be completed, the plant database indicated the commitment to be still pending for action. The actual status had to be determined based on either the personal knowledge of the plant personnel or the review of the affected plant document.
3. Review of the plant documents for the completed commitments indicated that, except for commitment number NL-03-019-01, all the other commitments selected for the review were implemented as committed.

Table 1 summarizes what the NRC staff observed as the current status of licensee commitments reviewed during the audit. The discrepancy identified for Commitment No. NL-03-019-01 needs to be resolved, and the licensee issued Condition Report CR-IP3-2006-01245 to track the resolution.

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The NRC staff reviewed the licensee's procedure EN-LI-110, "Commitment Management Program," Revision 0, against NEI 99-04 guidelines. In particular, in regards to managing a change or deviation from a previously completed commitment, Section 1.0 specifically states that the procedure is based on and implements the recommendations of NEI 99-04. Section 5.5 of EN-LI-110 defines the process for making changes to a commitment. In general, EN-LI-110 follows closely the guidance of NEI-99-04: it sets forth the need for identifying, tracking and reporting commitments, and it provides a mechanism for changing commitments.

The NRC staff also reviewed Entergy's self-assessment report titled "Regulatory Commitment Management" dated October 2005. This was a comprehensive review of the commitment management program which identified four areas for improvement, three positive observations, and one strength. The NRC staff commends the licensee for the proactive approach of using self-assessments to identify opportunities for improvement and to check for any non-compliance, and for involving individuals from other nuclear plant sites to obtain new perspectives.

The NRC staff reviewed the latest submittals from the licensee to the NRC which reported revisions to the docketed commitments as permitted per NEI-99-04. The latest submittal for IP2 was Entergy letter NL-05-067, dated May 23, 2005. The latest submittal for IP3 was

Entergy letter NL-05-111, dated October 4, 2005. In these letters, the licensee stated it had not identified any commitment changes for the reporting period which required a report to the NRC.

As set forth in Section 2.1 above, the NRC staff found that the licensee had properly addressed all the regulatory commitments selected for this audit, except for commitment no.

NL-03-019-01. As a result of the review of the licensee's information, as well as information from other sources, the NRC staff found no reason to differ from the licensee's reported status of the audited commitments. Thus, the NRC staff judges that the procedure used by the licensee to manage commitments is appropriate and effective. However, the licensee needs to resolve discrepancies identified for commitment NL-03-019-01.

3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, (1) the licensee had implemented or is tracking for future implementation its regulatory commitments; and (2) the licensee had implemented an effective program to manage changes to regulatory commitment. The resolution of the discrepancy identified for commitment NL-03-019-01 has been discussed with the licensee's staff and entered into the licensee's corrective action program.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Kevin Kingsley
Ann Stewart
Don Croulet

Principal Contributors: J. Boska
B. Singal

Date: May 2, 2006

TABLE 1 (Page 1 of 4)

AUDITED: WRITTEN COMMITMENTS AND RELATED INFORMATION
(2002 THROUGH 2006)

Entergy Submittal	Unit No.	NRC TAC No.	NRC Issuance	Summary of Commitment, and Licensee's Tracking Number	Licensee Implementation Status
10/23/01, IPN-01-074	IP3	MB3355	Amend. No. 210, 02/06/02	<p>ENO currently has and will maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. Chemistry procedures exist to implement these contingency plans.</p> <p>ENO currently has and will maintain the capability for classifying fuel damage events at the Alert level threshold at 300 Ci / cc dose equivalent iodine. This capability is described in the Emergency Plan implementing procedures.</p> <p>ENO currently has and will maintain the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in the Emergency Plan implementing procedures.</p> <p>Note: No commitment number assigned by the licensee since status of the actions was complete at the time of the submittal.</p>	<p>Complete.</p> <p>Highly radioactive samples and radioactive iodine samples are obtained and analyzed per plant procedures IPC-E-001-S, E-002-S, E-003, E-004-S and 3-CY-3910.</p> <p>Classifying fuel damage events is in IP-EP-120.</p>
03/04/03 NL-03-039	IP3	MB5382	Amend. No. 215, 03/17/03	<p>ENO will establish administrative controls to ensure prompt closure of containment openings in the event of a fuel handling accident in the containment building (IPN-02-044-1, COM-03-00006).</p> <p>ENO commits to the completion of tracer gas testing of the control room envelope to determine the flow rate of unfiltered air inleakage (NL-03-039-1)(Status is active in database, should be closed).</p>	<p>Complete, based on review of procedure 3-PT-W018, rev. 5.</p> <p>Complete. (Reference: Entergy Letter NL-05-085, dated June 28, 2005).</p>
01/23/03 NL-03-019	IP3	MB5296	Amend No. 216, 03/25/03	<p>Revise Technical Specification Bases to specify a requirement that a dedicated operator is assigned for operating and controlling the chemical and volume control system, including monitoring pressurizer level, whenever pressurizer level in Mode 3 is above the existing Mode 1 Technical Specification limit (NL-03-019-01).</p> <p>Revise the operating procedure for plant cooldown from Mode 3 to Mode 4 to implement the requirement for a dedicated operator as stated in the revised Technical Specification Bases. (NL-03-019-02).</p>	<p>Technical Specification Bases (page B3.4.9-3, Revision 3) revised to include the requirement for a dedicated operator.</p> <p>The latest plant procedure 3-POP-3.3 states to use a dedicated operator when the pressurizer level is above 73% which is inconsistent with the commitment. The Mode 1 limit is 54.3% level. The licensee issued CR - IP3-2006-01245 to track the resolution.</p>

Entergy Submittal	Unit No.	NRC TAC No.	NRC Issuance	Summary of Commitment, and Licensee's Tracking Number	Licensee Implementation Status
03/29/02 IPN-02-022 12/17/02 IPN-02-093 06/12/03 NL-03-03	IP3	MB7224	Amend No. 219 10/30/03	<ul style="list-style-type: none"> • Design, issue, and track a plant modification to install 2-inch charcoal beds in the control room ventilation system (CRVS) by Refueling Outage 13 (IPN-02-093-01). • Prepare and submit a Technical Specification (TS) change to correct TS 5.5.10(d) pressure differential for CRVS 2-inch beds by Refueling Outage 13 (IPN-02-093-02). • Prepare administrative controls to test 2-inch beds to a defined filter pressure drop until TS is approved, by Refueling Outage 13 (IPN-02-093-03). • Test CRVS at 2-inch water gauge for filter differential pressure (delta P) until 2-inch filters are installed or the end of Refueling Outage 13 (IPN-02-093-04). 	<p>Complete based on review of procedure 3PT-R032C, Revision 21.</p> <p>Delayed due to higher priorities (to be completed by 9/22/2006.)</p> <p>Complete based on review of procedure 3PT-R032C, Revision 21.</p> <p>Complete based on review of procedure 3PT-R032C, Revision 19.</p>
12/22/04 NL-04-163	IP3	MC4991	Amend No. 223	<p>The acceptance was contingent upon the licensee including the following commitments into its commitment management program:</p> <ul style="list-style-type: none"> • Maintain its leakage reduction program to less than 1 gallon per hour. • Perform a laboratory test of the containment fan coolers' charcoal that demonstrates an organic iodine removal efficiency which equates to 70% efficiency when the methodology of Generic Letter 99-02 is used. • Administratively control the activity level of iodine in primary coolant to below 25% of the TS values and primary-to-secondary leakage to a total of 500 gpd. 	<p>Complete.</p> <p>Commitments were made in the interim while the full scope of the alternative source term (AST) was approved. AST methodology has already been approved (Amendment No. 224) and implemented at IP3.</p>
01/17/2005 NL-05-002	IP2	MC0542	NRC Bulletin 2003-02, 8/21/03	<p>IP2 will either (a) lower the head insulation package or remove individual panels during the next (2R17) refueling outage and perform additional cleaning of the lower head surface to remove the boron residue to provide an acceptable baseline to improve the effectiveness of future visual examinations, or (b) perform non destructive testing of the BMI penetrations during the next (2R17) refueling outage, or c) perform some combination of (a) and (b), or (d) utilize a mutually agreed method of verification between Entergy and the NRC utilizing new technology, should such technology become available between now and the next (2R17) refueling outage. Regardless of the option chosen, all 58 penetrations will be addressed (NL-05-002-A).</p>	<p>Pending. Scheduled for 2R17 refueling outage in April 2006.</p>

Entergy Submittal	Unit No.	NRC TAC No.	NRC Issuance	Summary of Commitment, and Licensee's Tracking Number	Licensee Implementation Status
02/11/2005 NL-05-020	IP3	MC3552	Amend No. 225 3/24/05	<ul style="list-style-type: none"> • Revise Technical Specification Bases 3.4.3 to delete the reference to the PTLR and to clarify that the PT limit curves are now based on 34.0 EFPY instead of 34.7 EFPY. In addition, the licensee will clarify the basis for labeling the curves for 20 EFPY for applicability to the LTOPS arming temperature (NL-05-020-01). • Continue active participation in the EPRI MRP research initiatives regarding aging-related degradation of RV components (NL-05-020-02). • Evaluate the EPRI recommendations resulting from the initiative and implement a reactor vessel internals degradation management program applicable to IP3 (NL-05-020-02). • Incorporate the resulting RV internals inspections into the IP3 augmented inspection plan, as appropriate (NL-05-020-02). • Submit to NRC for review and approval, the augmented inspection plan that incorporates inspection of the IP3 RV (internals)(NL-05-020-02). 	<p>Complete. (Reference: Technical Specification Bases Page B 3.4.3-5, Revision 2).</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Scheduled for March 2010.</p>
10/25/2004 NL-04-135	IP2& 3	MC4988 MC4989	Amend No. 242 (IP2) and 227 (IP3) 4/14/05	<ul style="list-style-type: none"> • Provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations) (NL-04-135-A for IP2 and NL-04-135-1 for IP3). • For sites possessing both operating and shutdown reactors, licensees should provide information to the NRC annually (e.g., with its annual submittal in accordance with 10 CFR 20.2206) to support the apportionment of station doses to differentiate between operating and shutdown units. The data will provide the summary distribution of annual whole body doses as presented in Appendix B of NUREG-0713 for each reactor type and for operating and shutdown units (NL-04-135-B for IP2 and NL-04-135-2 for IP3). 	<p>Ongoing.</p> <p>The licensee is required to submit reports on a regular interval and no further verification is needed.</p>

Entergy Submittal	Unit No.	NRC TAC No.	NRC Issuance	Summary of Commitment, and Licensee's Tracking Number	Licensee Implementation Status
11/01/2004 NL-04-126	IP2	MC5036	Amend No. 244	<p>Commitment 1 - Safe Load Paths (NL-04-126-01) Safe load paths will be determined, analyzed and documented in procedures for control of heavy loads handled by the FSB gantry crane. It should be noted that the FSB gantry crane (by design) is unable to move spent fuel casks over any area of the spent fuel pit where the spent fuel is stored. However, to further minimize the potential for a heavy load impacting irradiated fuel in the spent fuel pit, load paths will be defined in procedures and shown on equipment layout drawings. Deviations from the safe load paths will require written alternative procedures reviewed and approved in accordance with IP2 procedures.</p> <p>Commitment 2 - Procedures (NL-04-126-02) Gantry crane operating procedures utilized for cask and cask component lifts will be prepared to include: identification of required equipment; inspection and acceptance criteria required before load movement; the steps and proper sequence to be followed in handling the load; defining the safe load path; and other precautions. A specific cask loading and handling procedure will provide additional details for controlled movement during cask handling operations.</p> <p>Commitment 3 - Crane operators (NL-04-126-03) Crane operators will receive training that includes provisions of Chapter 2-3 of American National Standards Institute (ANSI) standard B30.2-1976. In addition, completion of a crane-specific on-the-job training qualification card is required.</p> <p>Commitment 4 - Special lifting devices (NL-04-126-04) The HI-TRAC® lifting yoke is the only special lifting device that is required to meet the guidelines of ANSI N14.6-1993 and the additional guidelines of NUREG-0612, Section 5.1.6(1)(a).</p> <p>Commitment 5 - Lifting devices that are not specifically designed (NL-04-126-05) Other lift components utilized with the HI-STORM® 100 cask system meet ANSI B30.9-1971 requirements, including the additional guidelines of NUREG-0612, Section 5.1.6(1)(b).</p> <p>Commitment 6 - Crane inspection, test and maintenance (NL-04-126-06) The FSB gantry crane will be inspected, tested and maintained in accordance with Chapter 2-2 of ANSI B30.2-1976 and the additional guidance contained in NUREG-0612, Section 5.1.1(6) regarding frequency of inspections and test.</p>	<p>Pending. Items are in the database.</p> <p>The fuel storage building gantry crane has been ordered, but not received at site.</p>
10/22/2004 NL-04-134	IP2 & 3	MC5032 MC5033	Amend No. 243 (IP2) and 228 (IP3) 4/14/05	Licensee should verify that it has, and will maintain, a hydrogen monitoring system capable of diagnosing beyond design-basis accidents.	Complete. (Reference: Procedure 2PC-Q3, Revision 12).