



Entergy Nuclear Northeast
Indian Point Energy Center
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Fred Dacimo
Site Vice President
Administration

August 22, 2006

Re: Indian Point Units 2 and 3
Dockets 50-247 and 50-286
NL-06-088

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Reply to Request for Additional Information Regarding Proposed License Amendment for Changes to Administrative Controls (TAC MC9475 / 9476)

- REFERENCES:
1. NRC letter to Entergy dated July 20, 2006; "Request for Additional Information Regarding Amendment Application for Changes to Administrative Controls".
 2. Entergy letter NL-05-137 to NRC dated December 27, 2005; "Proposed Changes to IP2 / IP3 Technical Specifications: Adoption of TSTF-258, TSTF-308, and Related Administrative Control Changes Based on NUREG-1431".

Dear Sir or Madam:

Entergy Nuclear Operations, Inc is providing, in Attachment One, a response to the request for additional information (Reference 1) regarding a proposed license amendment (Reference 2) for changes to certain administrative controls.

This response modifies the proposed technical specification changes regarding the Storage Tank Radioactivity Monitoring Program, but it does not change the conclusions of the No Significant Hazards Evaluation included in Reference 2.

There are no new commitments identified in this submittal. If you have any questions or

ADD

require additional information, please contact Mr. Patric W. Conroy, IPEC Licensing Manager at (914) 734-6668.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fred R. Dacimo', with a long horizontal flourish extending to the right.

Fred R. Dacimo
Site Vice President
Indian Point Energy Center

cc:

Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Samuel J. Collins, Regional Administrator, NRC Region I
NRC Resident Inspector's Office, Indian Point 2
NRC Resident Inspector's Office, Indian Point 3
Mr. Peter R. Smith, NYSERDA
Mr. Paul Eddy, NYS Department of Public Service

ATTACHMENT ONE TO NL-06-088

**REPLY TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT
FOR CHANGES TO ADMINISTRATIVE CONTROLS**

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNITS NO. 2 and 3
DOCKETS 50-247 and 50-286**

NRC Question:

Entergy has requested to change the TS on the Explosive Gas and Storage Tank Radioactivity Monitoring Program (TS 5.5.10.c for IP2 and TS 5.5.11.c for IP3). The change would allow an increase in the quantity of radioactivity in outdoor tanks not surrounded by liners, dikes, or walls, to concentrations that are 10 times the values of 10 CFR Part 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply beyond the site boundary, in the event of an uncontrolled release of the tanks' contents. The justification is based on the Technical Specification Task Force (TSTF) document TSTF-258. However, TSTF-258 applies to monitored liquid effluent releases, not to tanks. NUREG-1431, Rev. 3, Standard TSs, has the same wording as the current IP2 TS. The current wording supports the 10 CFR 50.36a criteria to keep releases to a small fraction of the public dose limit in the unlikely event of a tank failure resulting in an unmonitored release. Please justify how the revised wording would keep releases to a small fraction of the public dose limit.

Entergy Reply:

Entergy is modifying proposed change C.3 in Table One of the December 27, 2005 license amendment request (NL-05-137) regarding the Storage Tank Radioactivity Monitoring Program to reflect the current wording in the Standard Technical Specifications (STS), NUREG-1431.

Since IP2 TS 5.5.10.c already reflects the STS wording, proposed change C.3 for IP2 and the corresponding IP2 markup page 5.5-11 provided in NL-05-137 are withdrawn.

Proposed change C.3 for IP3 is being modified to reflect the current STS and IP2 wording. Insert Z for IP3 markup page 5.0-26 provided in NL-05-137 is revised to read as follows:

Insert Z

the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

Inserts X and Y for IP3 markup page 5.0-26 remain as proposed in NL-05-137.