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Fred Dacimo
Site Vice President
Administration

~~Security-Related Information - Withhold Under 10 CFR 2.390~~

June 14, 2007
Indian Point Units 2 and 3
Docket Nos. 50-247, and 50-286
NL-07-075

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852

SUBJECT: Additional Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies

- REFERENCES:
1. Letter, Entergy to USNRC, "Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies," dated January 11, 2007.
 2. NRC Letter, C. Haney, to Holders of Licenses for Operating Power Reactors, Indian Point Nuclear Generating Station, Units 2 and 3, "Site-Specific Request for Details of Phase 2 Spent Fuel Pool Mitigation Strategies", June 21, 2006,
 3. NRC Letter, C. Haney, to Indian Point Nuclear Generating Station, Units 2 and 3, M. Kansler, "Mitigation Strategies Assessment and Closure Process for Phases 1, 2, and 3," dated October 13, 2006.
 4. Letter, Entergy to USNRC, "Response to Report of Inspection of Nuclear Reactor Safeguards Interim Compensatory Measure – Section B.5.b, Temporary Instruction 2515/164; NRC Inspection Report 05000247/2005010 and 05000286/2005008," dated February 23, 2005

Dear Sir or Madam:

Reference 1 provided Entergy's response regarding implementation details for the Spent Fuel Pool and Reactor/Containment Mitigation Strategies requested by References 2 and 3 for Indian Point. Reference 1 was developed using NEI 06-12, Revision 2, "B.5.b Phase 2 & 3 Submittal Guideline." The guideline was developed by the Nuclear Energy Institute in conjunction with an industry working group to assist licensees in responding to and implementing the mitigation strategies. Our intent was to implement this guidance.

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A telephone call held on April 10, 2007 discussed the NRC review of Reference 1. This letter is to confirm the discussion that the Indian Point guidance document, revised per Reference 4 to require evaluation and implementation of feasible measures to divert or contain radioactive water, would be applicable to the strategies discussed in Reference 1. Additionally, this letter also revises the strategies identified in Tables A.2-2 and A.2-3. The Indian Point 3 intent is to comply with the two hour deployment time frame discussed in NEI 06-12 for fill and, when fuel is not in a dispersed condition, spray. Spray may take five hours when fuel is dispersed. This deployment will be demonstrated by evaluation rather than "Deployment of external spray or fill within 2 hours (both equivalent in time) will be demonstrated at SAMG frequency." These changes are consistent with NEI 06-12.

Since this letter includes security related information it is requested that it be withheld from public disclosure in accordance with 10 CFR 2.390. This letter provides no new regulatory commitments.

If you have any questions, or require additional information, please contact Mr. T. R. Jones, Manager, Licensing at (914) 736-6668.

Sincerely,



Fred R. Dacimo
Site Vice President
Indian Point Energy Center

cc: Mr. Samuel J. Collins, Regional Administrator, Region I
Mr. John Boska, NRR Senior Project Manager
IPEC NRC Resident Inspector's Office

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