Entergy Nuclear Northeast
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

Fred Dacimo
Site Vice President
Tel 914 734 6700

June 21, 2007

Re: Indian Point Nuclear
Generating Unit No. 2
Docket No. 50-247
NL-07-078

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

Subject: **Station Blackout (SBO) / Appendix R Diesel Generator Commitment for Indian Point Nuclear Generating Unit No. 2 in Response to NRC Review Status of License Renewal Application**

References:
1. Entergy letter NL-07-039, dated April 23, 2007, License Renewal Application
2. Entergy letter NL-07-056, dated May 3, 2007, Supplement to License Renewal Application
3. NRC letter (Accession No. ML071630049), dated June 18, 2007, Review Status of the License Renewal Application for the Indian Point Nuclear Generating Unit Nos. 2 and 3

Dear Sir or Madam:

By letter dated April 23, 2007, Entergy Nuclear Operations, Inc. (ENO) submitted an application pursuant to 10 CFR Part 54, to renew the Indian Point Nuclear Generating Unit Nos. 2 and 3 (Indian Point Energy Center) operating licenses (Reference 1). ENO supplemented that application by letter dated May 3, 2007 (Reference 2). This letter provides clarifying information to support the NRC review of the Indian Point Energy Center (IPEC) License Renewal Application (LRA).

In a letter dated June 18, 2007, the NRC Staff informed ENO that "certain information is needed for the staff to complete the acceptance review" of the LRA (Reference 3). The Staff believes that the "current licensing basis for Unit 2 was not fully represented in accordance with Part 54.4(a)(3) of Title 10 of the Code of Federal Regulations (10 CFR 54.4(a)(3))." Specifically, "the LRA did not include information on the gas turbines currently credited as an alternate power supply for the Appendix R and SBO events" (Reference 3). The additional information provided

A128
A006

NRR

in this letter clarifies and supports that the Unit No. 2 current licensing basis (CLB) is fully represented in the LRA consistent with Section 54.4(a)(3).

The LRA includes information on the gas turbine system. Although the gas turbines will not be credited as an alternate power supply to meet Appendix R and SBO requirements during the period of extended operation for purposes of Section 54.4(a)(3), the gas turbine system is included in the scope of license renewal. For purposes of aging management review, the license renewal rule, Section 54.21(a)(3), requires, "For each structure and component identified in paragraph (a)(1) of this section, demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the period of extended operation." During the period of extended operation, the new SBO/Appendix R diesel generator will be credited to meet Appendix R and SBO requirements for purposes of Section 54.4(a)(3). Consequently, to comply with 54.21, the aging management review in the LRA addresses the SBO/Appendix R diesel generator system.

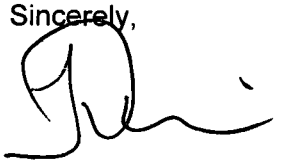
ENO believes that statements in the LRA (see for example Section 2.1.1.3.5) that the new SBO/Appendix R diesel generator will be credited during the period of extended operation constitute a prospective change in the current licensing basis. The NRC has identified a need to ensure the change in question is clearly incorporated into the IPEC CLB in order to provide the information necessary for NRC to complete its acceptance review of the LRA.

Consistent with our telephone call of June 6, 2007 and the follow-up telephone call of June 11, 2007, ENO provides the following commitment:

> ENO clarifies and supplements Section 2.1.1.3.5 of the LRA with a commitment that the Unit No. 2 SBO/Appendix R diesel generator will be installed and operational by April 30, 2008. This committed change to the facility meets the requirements of 10 CFR 50.59 (c)(1) and, therefore, a license amendment pursuant to 10 CFR 50.90 is not required.

One new commitment is being made in this letter (Attachment 1). If you have any questions, please contact Mr. T.R. Jones, Manager, Licensing at (914) 734-6670.

Sincerely,



Fred R. Dacimo
Site Vice President
Indian Point Energy Center

Attachments:
1. SBO / Appendix R Diesel Generator Commitment

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Samuel J. Collins, Regional Administrator, NRC Region 1
NRC Resident Inspector's Office, IPEC
Mr. Peter R. Smith, President, NYSERDA
Mr. Paul Eddy, New York State Dept. of Public Service

ATTACHMENT 1 TO NL-07-078

SBO / Appendix R Diesel Generator Commitment

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247

Commitment for Indian Point Nuclear Generating Unit No. 2
SBO/Appendix R Diesel Generator

ID	DESCRIPTION	DATE
NL-07-078-C01	ENO clarifies and supplements Section 2.1.1.3.5 of the LRA with a commitment that the Unit No. 2 SBO/Appendix R diesel generator will be installed and operational by April 30, 2008. This committed change to the facility meets the requirements of 10 CFR 50.59 (c)(1) and, therefore, a license amendment pursuant to 10 CFR 50.90 is not required.	April 30, 2008