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Fred Dacimo  
Site Vice President  
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October 1, 2007

Re: Indian Point Unit 2  
Docket No. 50-247  
NL-07-110

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

Subject: **Action Plan to Address the Procedure Adequacy Substantive Cross-Cutting Issue for Indian Point Unit 2**

Reference 1. NRC letter, "Mid-Cycle Performance Review and Inspection Plan-Indian Point Nuclear Generating Units 2 and 3" dated August 31, 2007.

Dear Sir or Madam:

This letter provides Entergy Nuclear Operations, Inc. (Entergy) response to your request in Reference 1 for details on Entergy's action plan to address the procedure adequacy substantive cross-cutting issue at Indian Point Unit 2.

Entergy is committed to improving the quality of the procedures and addressing integration of operating and maintenance practices between the units. Since Entergy purchased the plants several years ago, management has taken a number of actions to strengthen and enhance procedure quality. Those actions have enabled the units to operate safely and reliably in the midst of the many changes that have accompanied new ownership and integration.

To further enhance procedures, action plans were developed for improvements in the Operations and Maintenance departments. The schedules for the Operations, I&C and Maintenance procedures are provided in Attachment 1 to this letter.

The progress of the Operations procedure revisions is behind the originally established schedule. The cause of the delay was due to a scope expansion instituted to thoroughly and carefully resolve differences between the Unit 2 and Unit 3 procedures related to several aspects including, but not limited to, set points, operational limits, and associated actions. In order to expedite resolution of the substantive cross-cutting issue, the level of effort for procedural review and upgrade has been revised to focus primarily on addressing level of detail, removal of human performance traps, and incorporating best practices. The operations work-down curve included in Attachment 1 reflects the revised project focus described above.

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I&C procedures are prioritized to support the ongoing work week process. A screening is performed for each I&C activity on future work week schedules to determine if a revision is necessary prior to the procedures' next scheduled performance. This methodology ensures all required revisions are completed prior to the next scheduled performance while allowing non-critical procedure revisions, such as format conversions, to be spread out over a longer project duration. The I&C work-down curve included in Attachment 1 reflects changes to the originally forecasted completion dates to account for the pre-emptive review process that has been established.

Substantial progress has been made to date with the upgrade of the Maintenance procedures over the last several years. In part this was possible due to the content of these documents being scoped based on component type. Notwithstanding the above, the project is slightly behind the originally established schedule. The Maintenance work-down curve included in Attachment 1 reflects changes to the originally forecasted completion dates.

A number of performance monitoring metrics have been implemented to provide oversight on project progress and challenges. Project work-off curves have been developed as station performance indicators with sub indicators for each department. These indicators are monitored daily by project management. Additionally project meetings are held weekly with project leads to evaluate challenges and schedule adherence.

To evaluate the effectiveness of the project Entergy will continue to perform periodic self assessments, which are currently performed on a quarterly basis. Additionally condition reports are screened and trend coded to flag procedure quality issues. Trend reports are also generated and assessed monthly for procedure quality issues to determine if adjustments to project plans/schedules are necessary.

There are no commitments contained in this letter. Should you or your staff have any questions regarding this matter, please contact Mr. Robert Walpole, Manager, IPEC Licensing at (914) 734-6710.

Very truly yours,



Fred R. Dacimo  
Site Vice President  
Indian Point Energy Center

Attachment 1: Entergy's Procedure Upgrade Project Schedules

cc:

Mr. Samuel J. Collins, Regional Administrator, NRC Region I

Mr. David C. Lew, Director, Division of Reactor Projects NRC Region I

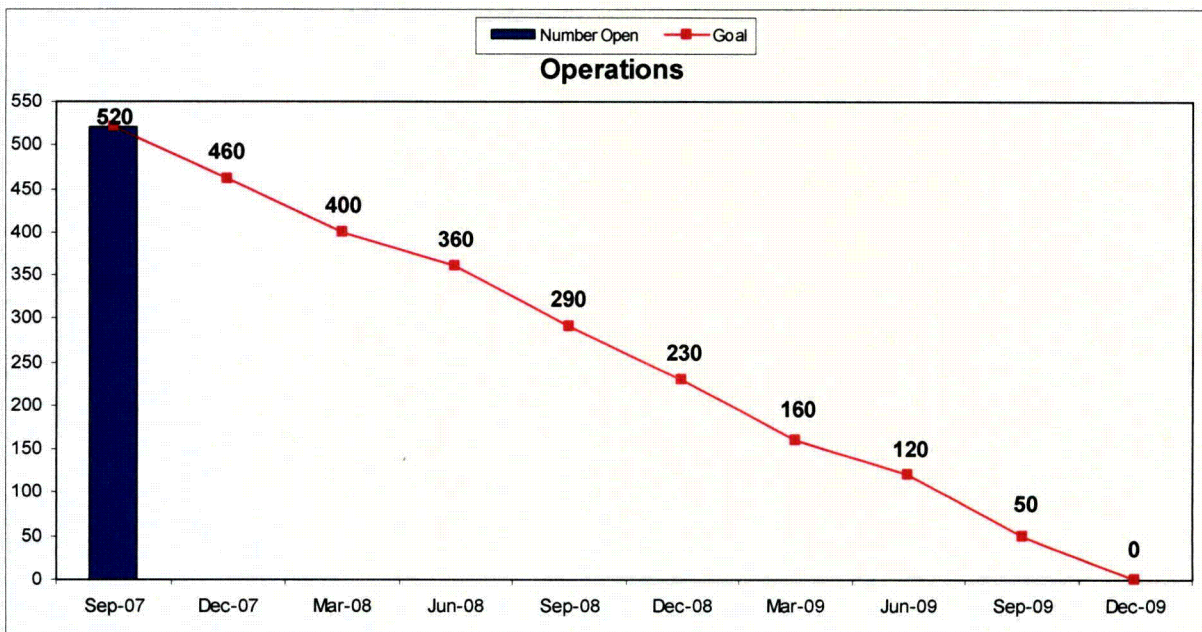
NRC Resident Inspector's Office, Indian Point Unit 2

Mr. Paul Eddy, New York State Department of Public Service

ATTACHMENT 1 TO NL-07-110

**Entergy's Procedure Upgrade Project Schedules  
(3 PAGES)**

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



#### Definition

Indicator measures the number of Operations procedures pending review/revision as compared to the projected work-off curve.

#### Goal

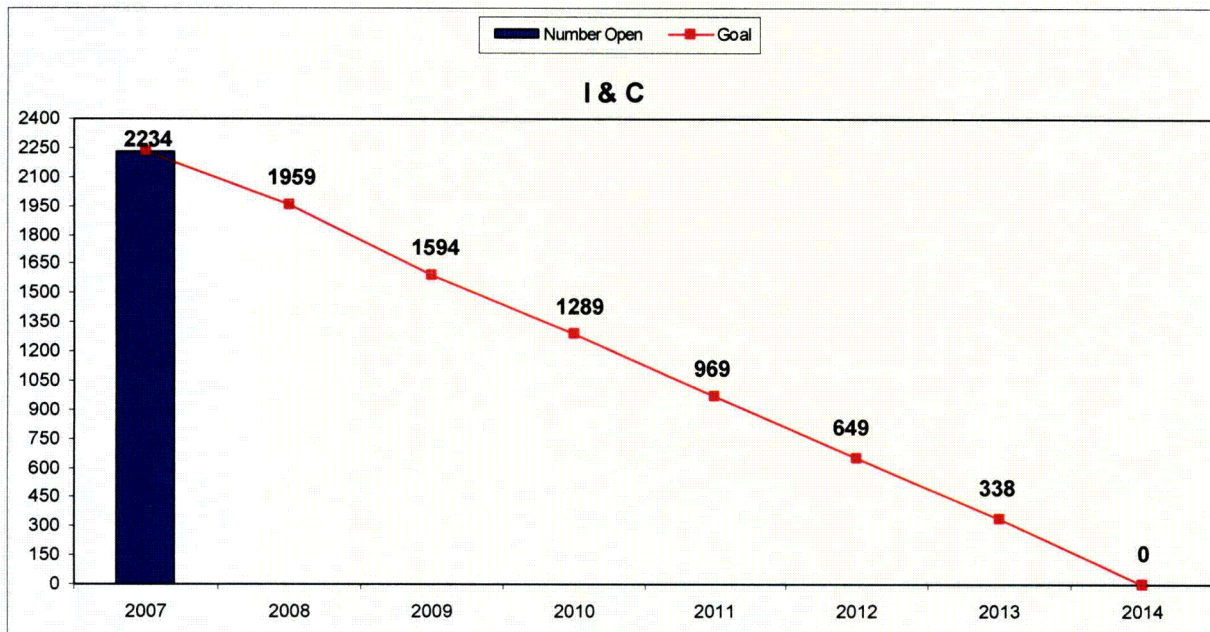
To have procedures upgraded as scheduled.

#### Analysis and Actions

The operations scope of effort for procedure review and upgrade was revised to focus on addressing level of detail, removal of human performance traps, and incorporating best practices.

The scope and projected rate of production is based on current resources assigned to the project. The work off curve also reflects outage impacts.





#### Definition

Indicator measures the number of I&C procedures pending review/revision as compared to the projected work-off curve.

#### Goal

To have procedures upgraded as scheduled.

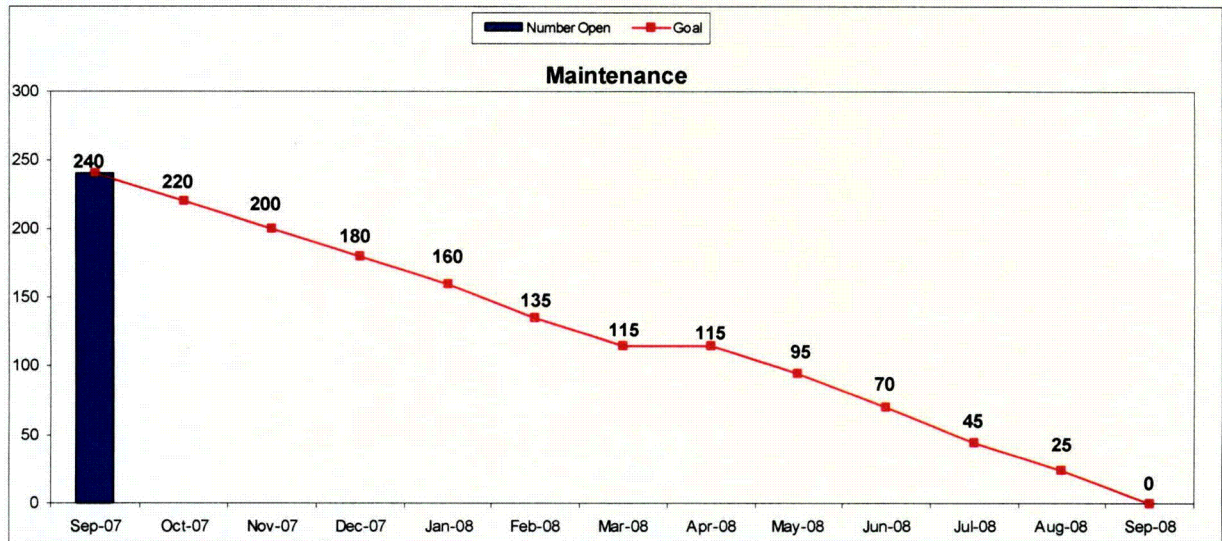
#### Analysis and Actions

The I&C Department scope started with over 2400 documents including I&C Preventative Maintenance Procedures (ICPMs), Technical Specification Surveillance Procedures, and special instructions. In many cases, the format and content of the Unit 2 and Unit 3 documents differ significantly. A substantial number of the Unit 2 ICPMs exist only as data sheets and require procedure development to match the Unit 3 equivalent.

The duration of the I&C project is acceptable as all procedures are prioritized to support the ongoing work week process that ensures documents are screened and/or revised prior to the next scheduled performance.

The scope and projected rate of production is based on current resources assigned to the project. The work off curve also reflects outage impacts.





#### Definition

Indicator measures the number of Maintenance procedures pending review/revision as compared to the projected work-off curve.

#### Goal

To have procedures upgraded as scheduled.

#### Analysis and Actions

The scope and projected rate of production is based on current resources assigned to the project. The work off curve also reflects outage impacts.