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**J.E. Pollock**  
Site Vice President  
Administration

February 2, 2009  
Indian Point Nuclear  
Generating Unit Nos. 2 and 3  
Docket No. 50-247 and 50-286  
NL-09-021

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

**SUBJECT:** Response to Request for Additional Information Regarding Generic Letter 2004-02 (TAC Nos. MC4689 and MC4690)

**REFERENCES:**

- 1) Entergy letter NL-08-025, 02/28/08, "Supplemental Response to NRC Generic Letter 2004-02; "Potential Impact Of Debris Blockage On Emergency Recirculation During Design Basis Accidents At Pressurized-Water Reactors""
- 2) NRC letter to Indian Point Vice President of Operations, 11/19/08, "Indian Point Nuclear Generating Unit Nos. 2 and 3 – Request for Additional Information Regarding Generic Letter 2004-02 (TAC Nos. MC4689 and MC4690)"
- 3) Entergy letter NL-08-153, 10/17/08, "Request for Extension of Completion Dates for Indian Point Units 2 and 3 Corrective Actions Required by Generic Letter 2004-02; "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors""
- 4) NRC letter to Indian Point Vice President of Operations, 10/30/08, "Indian Point Nuclear Generating Unit Nos. 2 and 3 – Approval of Revised Extension Request for Corrective Actions Required by Generic Letter 2004-02 (TAC Nos. MC4689 and MC4690)"

Dear Sir or Madam:

On February 28, 2008, Entergy Nuclear Operations, Inc (Entergy) submitted its supplemental response (Reference 1) to GL 2004-02. The Nuclear Regulatory Commission (NRC) staff has reviewed that submittal and has developed a request for additional information (RAI) (Reference 2). The NRC also requested that a single response, covering all questions, be provided within 90 days of the RAI. The NRC further states that, should it be determined that an extension

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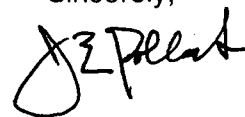
beyond 90 days be necessary, that the basis for the extension be provided. This letter provides that basis.

Entergy has reviewed the RAI and has concluded that more than 90 days is required to provide a meaningful and comprehensive response. The RAI addresses the supplemental response (Reference 1), however, since submitting that response, Entergy has determined that an alternate approach to chemical effects testing must be pursued. The alternate approach is described in the recent GL 2004-02 extension request (Reference 3) and involves not only chemical effects testing but also debris testing and substantial reanalysis. As described in Reference 3, and approved by the NRC in Reference 4, Entergy intends to complete all testing and supporting analyses by August 31<sup>st</sup>, 2009. Many of the RAI questions relate to testing and analysis techniques that are subject to revision due to the alternate approach being pursued. Therefore, prior to responding to the RAI, Entergy intends to complete the retesting and reanalysis and commensurate with that schedule will provide the RAI response by November 24<sup>th</sup>, 2009.

There are no new commitments being made in this submittal.

Should you have any questions or require additional information, please contact Mr. R. Walpole, Manager, Licensing at (914) 734-6710.

Sincerely,



J. E. Pollock  
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 1  
NRC Resident Inspector, IP2  
NRC Resident Inspector, IP3  
Mr. Robert Callender, Vice President, NYSERDA  
Mr. Paul Eddy, New York State Dept. of Public Service