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

NL-09-046

April 17, 2009

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

**SUBJECT:** Supplement to the Proposed License Amendment Regarding Reactor Vessel Heatup and Cooldown Curves and Low Temperature Over Pressure Requirements (ME0788)  
Indian Point Unit No. 2  
Docket No. 50-247  
License No. DPR-26

- REFERENCE:**
1. Entergy Letter, NL-09-013, to NRC regarding "Proposed Changes to Indian Point 2 Technical Specifications Regarding Reactor Vessel Heatup and Cooldown Curves and Low Temperature Over Pressure Requirements," dated March 5, 2009
  2. Entergy Letter, NL-04-005, to NRC regarding "Proposed Changes to Technical Specifications: Stretch Power Uprate Increase of Licensed Thermal Power (3.26%)," dated January 29, 2004
  3. Entergy Letter, NL-04-073, to NRC regarding "Reply to Request for Additional Information Regarding Indian Point 2 Stretch Power Uprate (TAC MC1865)," dated June 16, 2004

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. (Entergy) submitted, Reference 1, a request for a License Amendment to Operating License DPR-26, Docket No. 50-247 for Indian Point Nuclear Generating Unit No. 2 (IP2). The proposed amendment was to revise the Reactor Heatup and Cooldown curves and Low Temperature Overpressure Protection curves in Technical Specifications (TS) 3.4.3 and 3.4.12.

The purpose of this letter is to address an NRC question regarding the submittal which was discussed with the NRC during a telephone conference on April 16, 2009. WCAP-16752-NP, enclosed with Reference 1, states in Section 1.0 that the cooldown curves were generated using the NRC approved methodology documented in WCAP-14040-NP-A, Revision 4. Section 4.0 states that the neutron transport methodology meets the requirements of Regulatory Guide 1.190.

A001  
NRR

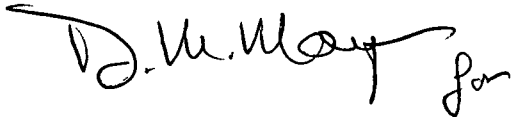
The NRC noted that this did not clearly indicate that the reactor vessel fluence calculation used to support the ART determinations used the approved methodology of WCAP-14040-NP-A, Revision 4 and requested clarification.

The Indian Point 2 fluence calculations were performed specifically as described in WCAP-14040-NP-A, Revision 4. These are the fluence calculations used for the Indian Point 2 Power Uprate (Technical Specification Amendment 241). The initial submittal (Reference 2) provided fluence information from WCAP-16157-P, Table 5.1-2. In response to a request for additional information regarding the details of this fluence information (Reference 3), Entergy noted that the fluence values in WCAP-15629, Revision 1, included power uprate fluence values and that the new P-T limit curves were calculated using a new applicability date and no new ART values. The same methodology used in WCAP-15629, Revision 1, was used in Calculation Note CN-REA-03-11, Revision 0, with the addition of several additional fuel cycles. In WCAP-16752-NP, Reference 14 contains the results from CN-REA-03-11 and references the Calculation Note.

This letter includes no new commitments. If you have any questions, or require additional information, please contact Mr. Robert Walpole, Manager, Licensing at (914) 734-6710.

I declare under penalty of perjury that the forgoing is true and correct. Executed on April 17, 2009

Sincerely,

A handwritten signature in black ink, appearing to read "J.E. Pollock" with a stylized flourish at the end.

J.E. Pollock  
Site Vice President  
Indian Point Energy Center

JEP/sp

cc: Mr. S. J. Collins, Regional Administrator, NRC Region I  
Mr. J. Boska, Senior Project Manager, NRC, NRR, DORL  
Resident Inspector's Office, IP2  
Mr. Paul Eddy, NYS Dept. of Public Service  
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA