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J.E. Pollock
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May 7, 2009

NL-09-059

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

SUBJECT: Proposed License Amendment Request to the Allowable Completion Time for Offsite AC Sources (TAC MD9348)
Indian Point Unit Number 2
Docket No. 50-247
License No. DPR-26

REFERENCE:

1. Entergy Letter, NL-08-094, to NRC Regarding Exigent License Amendment Request to the Allowable Completion Time for Offsite AC Sources, dated July 30, 2008
2. Entergy Letter, NL-09-009, to NRC Regarding Response to Request For Additional Information Regarding License Amendment to the Allowable Completion Time for Offsite AC Sources (TAC NO. MD9348), dated February 2, 2009.

Dear Sir or Madam:

Pursuant to 10 CFR 50.90 and 10 CFR 50.91(a)(6), Entergy Nuclear Operations, Inc (Entergy) requested an amendment to the Indian Point 2 (IP2) Operating License DPR-26 (Reference 1) and responded to a request for additional information (Reference 2). The proposed change to Technical Specification (TS) 3.8.1 would allow a one time extension to the completion time of Required Action A.4 to support replacement of one of the Station Auxiliary Transformer (SAT) cooling oil pumps.

The purpose of this letter is to finalize the commitments made to the NRC for the implementation of this change. There commitments are found in attachment 1 and supercede prior commitments submitted.

If you have any questions, please contact Mr. Robert Walpole, Licensing Manager, at (914) 734-6710.

ADD1

I declare under penalty of perjury that the foregoing is true and correct. Executed on May
7, 2009.

A handwritten signature in black ink, appearing to read "JEP", with a stylized flourish extending from the end.

JEP/sp

Attachments: 1. Commitments

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Samuel J. Collins, Regional Administrator, NRC Region 1
NRC Resident Inspector, IP2
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA
Mr. Paul Eddy, New York State Dept. of Public Service

ATTACHMENT 1 TO NL-09-059

COMMITMENTS

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

Number	Commitment
NL-09-059-01	<p data-bbox="371 281 1483 411">In order to minimize the risk associated with the extension of the completion time a number of actions will be taken and these actions will be controlled under the procedural requirements for an Infrequently Performed Test or Evolution (IPTE). The following actions will be taken:</p> <ul data-bbox="371 449 1488 1848" style="list-style-type: none"><li data-bbox="371 449 1455 674">• Equipment in the TS relied upon for postulated transients and accidents will be administratively controlled and protected to ensure the equipment remains operable and available for the duration of the planned SAT outage. This equipment includes the EDGs, the turbine driven and motor driven Auxiliary Feedwater pumps, Service water, Component cooling water, etc. Protection includes any planned activities to remove TS equipment from service for testing and / or maintenance.<li data-bbox="371 716 1455 877">• Procedures will be developed and issued for using the Unit 3 Appendix R diesel and the Unit 2 Appendix R / SBO diesel as backup power supplies for the Unit 2 emergency diesel generators. The feeder 13W93 with its autotransformer, the Unit 3 Appendix R diesel and the Unit 3 Appendix R / SBO diesel will be kept available as backup power supplies.<li data-bbox="371 919 1476 978">• Operations will restrict plant work activities with the potential to create a plant trip. This includes hot work limitations.<li data-bbox="371 1020 1471 1150">• Equipment used during normal operation that is not in TS but would be useful for any transient or accident (e.g., charging pumps, primary water pumps), will be powered from buses 5A and 6A to the extent feasible. This eliminates the potential for that equipment to be stripped.<li data-bbox="371 1192 1488 1518">• During this extended outage time all activity in the switchyards will be closely monitored and controlled. There will be no elective switchyard work (Consolidated Edison will be contacted to assure they are not performing elective work in the switchyard) that could challenge the operability of the 13.8 kV offsite power supply. Per communication with NRC on 3-20-2009, this was clarified to note that the switchyard work includes the 138 kV power source and the 138 kV/13.8 kV transformers #1, 2 and 3. The portions of the switchyard owned by Con Edison will be protected by the IP practice with them on protected equipment. Protected means that Con Ed allows us to restrict access to equipment and they will not work on it.<li data-bbox="371 1560 1471 1619">• The Grid operator will be consulted regarding grid stability prior to removal of the SAT from service.<li data-bbox="371 1661 1466 1848">• The work planning will consider weather conditions. Work planning will consider the weather forecast and avoid times when there will be a strain on the grid. There will be discussions with the grid operator. Similarly, the work will not be planned during the periods when severe weather is forecast. The work is projected to be complete in less than three days but may take up to six days so the work window is well within the short term weather forecast window.