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**Fred Dacimo**  
Vice President, Operations

May 19, 2003

Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL-03-081

US Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station O-P1-17  
Washington, DC 20555-0001

**SUBJECT:** Supplement 3 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications

**References:** 1) Entergy letter (NL-02-016) to NRC, "License Amendment Request (LAR 02-005) Conversion to Improved Standard Technical Specifications," dated March 27, 2002  
2) Entergy letter (NL-02-092) to NRC, "Supplement 1 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications," dated July 10, 2002  
3) Entergy letter (NL-03-035) to NRC, "Supplement 2 to the Indian Point 2 License Amendment Request for Conversion to Improved Standard Technical Specifications," dated February 26, 2003  
4) Staff Requests for Additional Information regarding References 1, 2, and 3 and associated Entergy responses (see Attachment 2)

Dear Sir:

By letter dated March 27, 2002 (Reference 1), as supplemented by letters dated July 10, 2002 (Reference 2) and February 26, 2003 (Reference 3), Entergy Nuclear Operations, Inc. (Entergy) requested to amend the Indian Point 2 (IP2) Plant Operating License, Appendices A and B, "Technical Specifications." The proposed amendment converts the IP2 Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) in accordance with NUREG 1431, "Standard Technical Specifications—Westinghouse Plants," Rev. 2. References 1, 2, and 3 indicated that the proposed ITS amendment would be periodically supplemented, as necessary, to incorporate approved amendments to the CTS. In addition, Entergy has made changes in response to Requests for Additional Information (RAIs) from the Nuclear Regulatory Commission (NRC) staff. The purpose of this supplement is to incorporate changes required by RAI responses, Technical Specification Task Force (TSTF) Travelers 411 and 418, and the following CTS Amendments:

A001

- Amendment 224, "Updated Pressure-Temperature Limit Curves," dated February 15, 2002;
- Amendment 225, "One Time Extension of Technical Specification Surveillance Intervals," dated March 27, 2002;
- Amendment 229, "Fuel Storage Building Air Filtration System," dated June 5, 2002; and
- Amendment 235, "Administrative Controls to Reflect Site Integration," dated December 17, 2002.

Attachment 1 to this supplement provides an index of the ITS sections that are affected by incorporation of Amendments 224, 225, 229, and 235 and revisions due to incorporation of previously submitted RAI responses.

Attachment 2, "Correspondence History of Responses to Requests for Additional Information," provides a list of staff RAIs and the corresponding Entergy responses. These letters described the changes that were made to the proposed ITS. To facilitate staff review, Entergy is attaching the RAIs and responses to each affected section of this supplement.

Attachment 3, "List of Pending License Amendment Requests (LARs) not Reflected in ITS Submittal and Supplements," shows amendment requests currently under review by your staff. Entergy requests continued processing of the proposed LARs in parallel with the review of the ITS submittal as supplemented. Additional supplemental submittals incorporating these LARs, when approved, will be made as required. These supplements will be coordinated with the NRC staff reviewers to ensure that the ITS review is not adversely impacted.

As was done with References 1, 2 and 3, the material constituting Supplement 3 to the ITS submittal is enclosed herewith on CD-ROM. The Supplement 3 CD-ROM includes the following:

- All the information originally transmitted by References 1, 2 and 3;
- A copy of this supplemental cover letter and attachments; and
- The IP2 CTS through Amendment 236.

This supplemental letter and the CD-ROM were prepared in accordance with the guidance provided in NRC Regulatory Issue Summary 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM."

As previously described, this supplement updates the proposed ITS of References 1, 2, and 3 to reflect previously reviewed and approved CTS Amendments. As such, a separate Safety Evaluation Report (SER) was issued with each CTS Amendment being incorporated by this supplement. Therefore, for the approved Amendments, this supplement has no impact on the determination of no significant hazards consideration of References 1, 2, and 3. The RAI responses have, in some cases, resulted in new or revised no significant hazards determination evaluations and these revised evaluations have been included with the associated specification packages. This supplement has not changed the conclusion that the conversion of the Indian Point 2 Technical

Specifications to Improved Technical Specifications involves no significant hazards consideration as defined by 10 CFR 50.92.

In accordance with 10 CFR 50.91, a copy of this submittal and the associated attachments are being submitted to the designated New York State official.


There are no commitments contained in this letter.

Should you or your staff have any questions regarding this matter, please contact the IP2 ITS Project Manager, Mr. William Blair at (914) 734-5336.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Executed on 5/19/03

  
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Fred R. Dacimo  
Vice President, Operations

Enclosure  
Attachments

cc: see page 4

cc: (w/o enclosure)

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**ATTACHMENT 1 TO NL-03-081**

**List of Sections Affected by CTS Amendments 224, 225, 229, and 235 and  
Incorporation of RAI responses**

Revised Supplement 3 Sections

2.0 – Rev. 1 Supp. 3  
3.3.1 – Rev. 1 Supp. 3  
3.3.2 – Rev. 1 Supp. 3  
3.3.3 – Rev. 1 Supp. 3  
3.3.4 – Rev. 1 Supp. 3  
3.3.5 – Rev. 1 Supp. 3  
3.3.6 – Rev. 1 Supp. 3  
3.3.7 – Rev. 1 Supp. 3

**ATTACHMENT 2 TO NL-03-081**

**Correspondence History of Responses to Requests for Additional Information**

Entergy Nuclear Operations, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247

- 1) RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS) (TAC No. MB4739)," dated August 6, 2002  
Response: Entergy letter (NL-02-130) to NRC, "Response to Request for Additional Information Regarding Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS)," dated October 10, 2002
- 2) RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS) (TAC No. MB4739)," dated August 6, 2002  
Response: Entergy letter (NL-02-133) to NRC, "Response to Request for Additional Information Regarding Section 5.5.14 of the Improved Technical Specifications (ITS)," dated October 28, 2002
- 3) RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.5.3 – Emergency Core Cooling System (ECCS) – Shutdown - The Improved Technical Specifications Beyond Scope Issue No. 1 (TAC No. MB5062)," dated September 26, 2002  
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.8.3 – Diesel Fuel Oil and Starting Air - Beyond Scope Issue No. 8 (TAC No. MB5069)," dated October 3, 2002  
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.7.8 – Service Water System - Beyond Scope Issue No. 6 (TAC No. MB5067)," dated October 10, 2002  
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Beyond Scope Issue No. 9, ITS Section 3.8.4 DC Sources - Operating (TAC No. MB5070)," dated October 17, 2002  
RAI: NRC letter to Entergy Nuclear Operations, Inc., "Comments and Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Beyond Scope Issues (BSI)-S1, BSI-S2, BSI-S3, BSI-S4, BSI-S5 and BSI-S6 (TAC Nos. MB6394, MB6395, MB6396, MB6397, MB6398, and MB6399)," dated October 17, 2002  
Response: Entergy letter (NL-02-148) to NRC, "Response to Request for Additional Information Regarding Sections 3.3.1, 3.5.3, 3.7.8, 3.8.3, 3.8.4, and 3.8.6 of the Improved Technical Specifications (ITS)," dated November 26, 2002



- 4) RAI: NRC letter to Entergy Nuclear Operations, Inc., "Indian Point Nuclear Generating Unit No. 2 – Comments and Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Sections 1.0, 2.0, 3.0, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.9, 4.0, and 5.0 (TAC No. MB4739)," dated October 22, 2002  
Response: Entergy letter (NL-02-160) to NRC, "Response to Request for Additional Information Regarding Sections 1.0, 2.0, 3.0, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.9, 4.0, and 5.0 of the Improved Technical Specifications (ITS)," dated December 18, 2002
- 5) RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Section 3.8.1 – AC Sources Operating – Beyond Scope Issue No. 7 (TAC No. MB5068)," dated December 31, 2002  
Response: Entergy letter (NL-03-002) to NRC, "Response to Request for Additional Information Regarding Section 3.8.1, AC Sources Operating, of the Improved Technical Specifications (ITS)," dated January 27, 2003
- 6) RAI: NRC letter to Entergy Nuclear Operations, Inc., "Request for Additional Information (RAI) Regarding Improved Technical Specification (ITS) Sections: 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation; ITS 3.3.3, Post Accident Monitoring Instrumentation; 3.3.4, Remote Shutdown Instrumentation; 3.3.5, Loss of Power Diesel Generator (LOP-DG) Start Instrumentation; 3.3.6, Containment Purge and Exhaust Isolation Instrumentation; 3.3.7 Control Room Ventilation System (CRVS) Actuation Instrumentation (TAC No. MB4739)," dated January 22, 2003  
Response: Entergy letter (NL-03-052) to NRC, "Response to Request for Additional Information Regarding Section 3.3, Instrumentation, of the Improved Technical Specifications (ITS)," dated April 8, 2003

**ATTACHMENT 3 TO NL-03-081**

**List of Pending License Amendment Requests (LARs) not Reflected in ITS  
Submittal and Supplements**

Entergy Nuclear Operations, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247

Letter No. and Date	LAR Title
NL-02-042 05/30/02	License Amendment Request (LAR-02-007) – Changes to Effectively Coordinate Indian Point Units 1 and 2 Programs
NL-02-155 12/12/02	License Amendment Request- Measurement Uncertainty Recapture Power Uprate Increase of Licensed Thermal power (1.4%)