



Entergy Nuclear Northeast
Indian Point Energy Center
295 Broadway, Suite 1
P.O. Box 249
Buchanan, NY 10511-0249
Tel 914 734 5340
Fax 914 734 5718

Fred Dacimo
Vice President, Operations

October 1, 2003

Re: Indian Point Units Nos. 1, 2, 3
Docket Nos. 50-3, 50-247, 50-286

NL-03-152

F. James Dykes
Risk Management Advisor
Entergy Services, Inc.
P.O. Box 61000
New Orleans, LA 70161

Subject: Response to American Nuclear Insurers (ANI) Nuclear Liability Insurance
Inspection Report, New Recommendations, dated August 7, 2003.

Reference: 1) Letter from Robert A. Oliveira (ANI), to Fred Dacimo, Nuclear Liability
Insurance Inspection, dated August 7, 2003.

Dear Mr. Dykes:

Indian Point Energy Center (IPEC) hereby provides in Attachment 1, the responses to the six (6) new recommendations identified in the August 7, 2003, ANI Nuclear Liability Insurance Inspection Report (Reference 1).

Should you or your staff have any questions regarding this matter, please contact Mr. John McCann, Manager, Licensing, Indian Point Energy Center at (914) 734-5074.

Sincerely,

A handwritten signature in black ink, appearing to be "FD" followed by a flourish.

Fred R. Dacimo
Vice President, Operations
Indian Point Energy Center

14001

cc: Ronald D. Rispoli
Manager, Loss Control
Arkansas Nuclear One – GSB-1E
448 S. P. 33
Russelville, AR 72801

Patrick E. Alberstadt
Entergy Sr. Risk Analyst
639 Loyola Avenue
L-ENT-13A
New Orleans, LA 70113

**ATTACHMENT 1
To NL-03-152**

Response to New ANI Liability Recommendations

**Entergy Nuclear Operations Inc.
Indian Point
Docket Nos. 50-3, 50-247, 50-286**

Response to New ANI Liability Recommendations (LR)

A Learning Organization Condition Report (LOCR) LO-IP3LO-2003-00466 has been issued to track the new ANI liability recommendations.

LR 03-01: Internal sensitivity studies should be performed on the following PCMs/PMs: one Gamma 40/60 portal monitor and one IPM-7/8 PCM located at the IP-3 RCA control point; one Gamma 40/60 portal monitor located at the IP-2 RCA control point. The MDA for internal deposition should be determined using sources that are major constituents of the plants waste stream, and are dispersed/placed in an anthropomorphic phantom so that the resulting sensitivity can be said to apply to internal contamination. If the calibration protocols and/or operating modes on other PCMs/PMs are adjusted (i.e., PCM-1Bs at the IP-2 RCA egress, Gamma 40/60s at the Protected Area egresses), internal sensitivity studies should be performed on these monitors as well.

Response: Entergy IPEC Radiation Protection agrees with this recommendation, and corrective action (CA) #3 to the LOCR has been issued to perform the internal sensitivity studies.

LR 03-02: If escorted individuals are required to enter a contaminated area, RP supervision should evaluate the individual's work experience. If the individual has previous dress-out experience, additional training may not be required. If the individual does not have dress-out experience, dress-out training should be required. The evaluation and subsequent dress-out training (if applicable) should be documented.

Response: Entergy IPEC Radiation Protection will establish an evaluation regarding an individual's dress-out work experience prior to contaminated area entry authorization. The corrective action for this recommendation will be tracked by LOCR CA #4.

LR 03-03: Indian Point Energy Center should perform a self-assessment to determine if the Unit 2 and Unit 3 RWP programs and PRORAD access control systems can successfully reconstruct an individual's work history (e.g., specific jobs worked, work locations, radiological conditions, work crew members, exposures per job). One RWP per Unit was chosen for the evaluation: Unit 2 RWP #020016, Rev. 00, *Scaffold – Indian Point 2*; and Unit 3 RWP #020018, Rev. 2, *Valves, Flanges, Fittings and Pumps – Routine*. One individual per RWP was pre-selected as a test case. The evaluation results should be documented.

Response: Entergy IPEC Radiation Protection will perform an assessment to determine if the RWP programs can successfully reconstruct an individual's work history. CA #5 of the LOCR will document the results of this assessment.

LR 03-04: Individuals who receive training via the Accelerated training process should be tested on the PAT portion of the training. The training material provided in the Emergency Plan and Radiation Protection modules of the IPEC GET Site Orientation Student Guide should be subject to testing.

Response: CA #6 has been assigned to the LOCR to track this issue. However, Entergy Northeast is currently evaluating this recommendation and how the fleet will address this recommendation.

LR 03-05: Electronic Training Department records (e.g., instruction material, CBT question bank, etc.) should be retained in accordance with ANI Information Bulletin 80-1A, *Nuclear Liability Insurance Records Retention*.

Response: Entergy IPEC agrees with this recommendation to retain records in accordance with ANI Information Bulletin 80-1A. LOCR CA #7 has been assigned to track this action to completion.

LR 03-06: IP-SMM-TQ-107, *General Employee Training*, and/or the appropriate Department Directives should be revised/written to reflect actual program elements. The specific program elements to be addressed include:

- The program description for initial training should be enhanced,
- A program description for the Challenge process should be included in procedure,
- The requirement to revoke unescorted access to the RCA upon RWT Re-qualification examination failure should be captured in procedure.

Response: Entergy IPEC Training Department agrees to write or revise the implementing procedure listed above, and LCOR CA #8 has been assigned to ensure completion of the procedure revision.