



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
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May 23, 2005

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-05-067

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station O-P1-17
Washington, D.C. 20555-0001

Subject: **Indian Point 2 Nuclear Power Plant Amendment Update to the
Final Safety Analysis Report (FSAR), Revision 19**

- References:
1. NEI 98-03, "Guidelines for Updating Final Safety Analysis Reports", Revision 1, June 1999
 2. NEI 99-04, "Guidelines for Managing NRC Commitments", Revision 2, December 1995
- Attachment:
1. Summary of Revisions to the Indian Point 2 Technical Specification Bases
 2. Revisions to Indian Point 2 Docketed Commitments
 3. Summary of Revisions to the Indian Point 2 Technical Requirements Manual
 4. Summary Report to the NRC of Information Removed from the UFSAR

Dear Sir:

Entergy Nuclear Operations, Inc. (Entergy), in accordance with 10 CFR 50.71(e), hereby transmits the most recent update to the Updated Final Safety Analysis Report (UFSAR) for Indian Point Unit 2 (IP2). This submittal incorporates applicable changes made to the IP2 facility since the last UFSAR update in October 2003, through the information available as of November 23, 2004, the completion of the last IP2 refueling outage. This submittal constitutes the nineteenth revision to the IP2 UFSAR.

As was done with previous versions of the IP2 UFSAR, this revision is being submitted on CD-ROM, and contains the entire IP2 UFSAR in Adobe Acrobat PDF format. The CD-ROM was prepared in accordance with the guidance contained in NRC Regulatory Issue Summary 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM."

UFSAR changes to the text and tables since the last revision are indicated by gray highlighted background rather than a revision bar next to the line containing the change. This update to the FSAR also contains information that has been classified as "Historical" information according to the NEI 98-03 definition (Reference 1), and is no longer subject to updating. Material designated as "Historical" information in the UFSAR is indicated by a green highlighted background.

Any UFSAR figures that have been revised since the last revision contain "Rev.19" in the figure title block. Additionally, this revision to the IP2 UFSAR replaced UFSAR figures that were clones of, or cloned parts of, plant drawings with current 'snapshots' of the plant drawing in the form a tiff file.

Indian Point 2 Technical Specification 5.5.12.d, "Technical Specification Bases Control Program" requires that changes to the Bases implemented without prior NRC approval be provided to the NRC on a frequency consistent with 10 CFR 50.71(e). The required information is provided in Attachment 1, Summary of Revisions to the IP2 Technical Specification Bases. The current version of the Technical Specification Bases is also being submitted on the CD-ROM, and contains the entire IP2 Technical Specification Bases in Adobe Acrobat PDF format.

Attachment 2 to this letter, Revisions to IP2 Docketed Commitments, submits a summary update of all changes made to the Unit 2 docketed commitments using the NEI 99-04 guidance, (Reference 2), for determination of commitments which do not have either a safety or regulatory significance, which may be changed without prior interaction with the NRC staff and which require periodic NRC staff notification either annually or along with the FSAR updates as required by 10 CFR 50.71(e).

The Technical Requirements Manual (TRM) under NEI 98-03 (Reference 1) is controlled in a manner consistent with procedures fully or partially described in the UFSAR. Under this approach, the TRM document is subject to the change control requirements of 10CFR50.59 and the update/reporting requirements of 10CFR50.71(e). Attachment 3 of this letter, submits the summary of changes to the Unit 2 TRM for the same time period as the Unit 2 FSAR update. Additionally, the current version of the TRM is also being submitted on the CD-ROM, and contains the entire IP2 TRM in Adobe Acrobat PDF format.

In accordance with the guidance in NEI 98-03 (Reference 1), information removed from the UFSAR should be specifically identified to the NRC as part of required UFSAR updates. Attachment 4 contains a summary with a brief description of the information removed from the IP2 UFSAR and the basis for its removal.


Entergy is making no new commitments in this letter.

Should you or your staff have any questions regarding this submittal, please contact Mr. Patric W. Conroy, Manager, Licensing, Indian Point Energy Center (IPEC) at (914) 734-6668.

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

Executed on 5/19/05
Date

Sincerely,


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

Enclosure: CD-ROM containing the IP2 UFSAR (Rev. 19), IP2 TRM and Technical Specification Bases for May 2005

cc: Mr. Patrick D. Milano, Senior Project Manager
Project Directorate I
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
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ATTACHMENT 1 TO NL-05-067

Summary of Revisions to the Indian Point 2 Technical Specification Bases

CHANGES TO INDIAN POINT 2 TECHNICAL SPECIFICATION BASES

(for period November 2003 through April 2005)

AFFECTED SECTIONS	REV	EFFECTIVE DATE	DESCRIPTION
ALL	0	11/3/2003	Initial issue of Bases derived from NUREG-1431, in conjunction with Technical Specification Amendment 238 for conversion of 'Current Technical Specifications' to 'Improved Technical Specifications'.
BASES UPDATE PACKAGE 01-12102003			
B 3.1.6 B 3.3.1 B 3.3.2 B 3.3.4 B 3.4.15 B 3.4.16 B 3.5.2 B 3.6.3 B 3.6.6 B 3.6.10 B 3.7.7	1	12/10/2003	Various wording clarifications based on Licensed Operator feedback during trial run of ITS.
BASES UPDATE PACKAGE 02-03042004			
B 3.8.9	1	03/04/2004	Remove 'MCC 210' from Table B 3.8.9-1, per 50.59 screen
BASES UPDATE PACKAGE 03-08092004			
B 3.3.1	2	08/09/2004	Clarification of testing in bypass, per 50.59 screen.
B 3.3.5	1	08/09/2004	Clarify requirements for performing a Trip Actuating Device Operational Test (TADOT) on the 480Volt SBO, degraded grid and undervoltage relays, per 50.59 screen.
B 3.7.10	1	08/09/2004	CRVS Fan terminology correction, per 50.59 screen.
B 3.8.7	1	08/09/2004	Clarification of inverter operability with frequency out-of-range, per 50.59 screen.
B 3.8.9	2	08/09/2004	Update Table 3.8.9-1 for safeguards MCC's, per 50.59 screen.
B 3.9.4	1	08/09/2004	Installation of a roll-up door on the Containment Equipment Hatch, per 50.59 Evaluation 04-0732-MD-00-RE.
B 3.9.5	1	08/09/2004	

REVISION HISTORY FOR BASES

AFFECTED SECTIONS	REV	EFFECTIVE DATE	DESCRIPTION
BASES UPDATE PACKAGE 04-10222004			
B 3.4.7	1	10/22/2004	Clarification on SG coupled to remove residual heat to provide additional operating flexibility while remaining consistent with the guidance of IN 95-35, per 50.59 screen.
BASES UPDATE PACKAGE 05-11222004			
B 3.3.2	2	11/22/2004	Stretch Power Uprate (3.26%) from 3114.4 MWth to 3216 MWth.
B 3.4.1	1	11/22/2004	
B 3.4.9			
B 3.5.4			
BASES UPDATE PACKAGE 06-12132004			
B 3.1.1 B 3.2.2	1	12/13/2004	Stretch Power Uprate (3.26%) from 3114.4 MWth to 3216 MWth.
B 3.3.1 B 3.3.2	3		
B 3.3.6 B 3.3.7 B 3.4.13	1		
B 3.4.16	2		
B 3.6.1 B 3.6.2	1		
B 3.6.3	2		
B 3.6.4 B 3.6.7 B 3.7.3 B 3.7.4 B 3.7.5	1		
B 3.7.7	2		
B 3.7.8	1		

AFFECTED SECTIONS	REV	EFFECTIVE DATE	DESCRIPTION
B 3.7.10 B 3.7.11 B 3.7.14 B 3.8.2 B 3.8.5 B 3.8.8 B 3.8.10 B 3.9.6	2 1	12/13/2004	Continued from previous page (Stretch Power Uprate (3.26%) from 3114.4 MWth to 3216 MWth)
BASES UPDATE PACKAGE 07-02252005			
B 3.3.1 B 3.7.5	4 2	02/25/2005	Clarification on the frequency of Surveillance Requirement 3.3.1.8 to perform a Channel Operational Test (COT) (CR-IP2-2004-04344). Clarification on Surveillance Requirement 3.7.5.3 as it relates to plant condition/frequency of performance of Auxiliary Feedwater Pump full flow testing.
BASES UPDATE PACKAGE 08-03222005			
B 3.8.1	1	03/22/2005	Changes to include operability criteria for 138 kV and 12.8 kV offsite circuits per 50.59 screen.

ATTACHMENT 2 TO NL-05-067

Revisions to Indian Point 2 Docketed Commitments

INDIAN POINT 2
2004 / 2005
COMMITMENT CHANGE SUMMARY REPORT

COMMITMENT NUMBER	CURRENT STATUS	CHANGED DATE	DESCRIPTION
			Revised text:

NOTE: THERE WERE NO COMMITMENTS CHANGED OVER THE 10/2003 through 11/2004 TIME FRAME THAT
 REQUIRE A REPORT TO THE NRC.

ATTACHMENT 3 TO NL-05-067

**Summary of Revisions to the Indian Point 2 Technical Requirements
Manual (TRM)**

Unit 2
TECHNICAL REQUIREMENTS MANUAL (TRM)

REVISION HISTORY

AFFECTED SECTIONS	NEW REV #	EFFECTIVE DATE	DESCRIPTION
3.7.F	2	03/31/2004	To extend the testing frequency of the Post Accident containment venting system from 24 months to 60 months.
3.9.C	2		Revise TRO 3.9.C from "Spent fuel pit water level shall be maintained > 23 ft above the top of irradiated fuel" to say, "The Spent Fuel Pit water level shall be >23 ft over the top of irradiated fuel assemblies seated in the storage racks."
5.3.B	2		Revise the section to be more generic in referencing the procedures(s) used for Procedure Preparation, Review, and Approval and to state that changes shall be reviewed and approved in accordance with the approved process that meets the requirements in the Quality Assurance Program Manual.
3.3.C 3.3.K B3.3.K	2 3 3	08/19/2004	Changes to Service Water Inlet Temperature Monitoring and Instrumentation for references to correct conditions, actions and time. Section 3.3.K changes to : "Flowmeter (LEFM) check 2000 system" to "Flowmeters (LEFMs)".
5.0	4	08/24/2004	Change responsibility to read the Shift Manager shall be responsible for ensuring plant operations are in accordance with the TRM.

B 3.9.B	2	10/28/2004	Add clarification to TRM for the use of the roll-up door as a containment closure device.
B3.0	2	01/20/2005	Place the word NOT in paragraph on B3.0-3.
5.0	5		Replace Steam Generator procedure reference with a new joint EN-DC-317 reference.
3.2.A B 3.2.A	2 2	01/24/2005	Revise to say, "Both Quadrant power tilt monitors" instead of "One Quadrant power tilt monitor, and "Verify QPTR is within limit by calculation" instead of "Perform Tech Spec SR 3.2.4.1."
TOC 3.3.K B.3.3.K	2 3 3	04/20/2005	Deletions due to Stretch Power Uprate 2% uncertainty.
5.0	6	05/04/2005	Update of the Inservice Testing Program procedures list.
5.0	7	05/24/2005	Add requirement to provide to the NRC using an industry database (INPO's) the operating data for each calendar month that is described in GL 97-02 by the last day of the month following the end of each calendar quarter.
Complete TRM to NRC		05/23/2004	Provide to the NRC the complete TRM as of 05/23/2005 and the revision history.

ATTACHMENT 4 TO NL-05-067

Summary Report to the NRC of Information Removed from the UFSAR

**Summary Report to the NRC of Information Removed from the Unit 2
UFSAR for the 2005 Update**

UFSAR Changes to:

Section 1.12.1 and Section 1.12 References 1 – 4

The IP2 ISI Third Interval Ten-Year Program Plan Revision 1 update contain the continued requirements for meeting the ASME, B&PV Code, Section XI, for IP2 ISI 3rd Ten Year Interval. It was developed in accordance with the requirements of ASME Code, 1989 Edition, no Addenda. The ISI Program is mentioned in the UFSAR with referenced program dates. Specifically, UFSAR General Section 1.12.1, 1st paragraph, describes the ISI and IST Program 3rd Interval dates as "July 1, 1994 through June 30, 2004."

The IP2 3rd Ten-Year ISI Program Plan end date was changed from June 30, 2004 to April 6, 2006, in accordance with Reference 1 below. These dates and references for UFSAR Section 1.12 (Ref. 1 through 4), are not required to be in the UFSAR, since they are controlled and referenced in the IP2 ISI Program Plan and plant procedures. This reference to interval dates is considered excessive in nature and does not add any pertinent information to the UFSAR.

Source Information:

Letter from A. Alan Blind, Con Edison, to Document Control Desk, NRC, Subject: Notification of Extension of the Third Ten-Year Inservice Inspection Interval, dated February 1, 2001.

Sections 1.2.2 Plant Description and 1.2.2.10 Structures, and Figures 5.1-2 through 5.1-7

The general arrangement of the plant is shown on historical Figures 1.2-1 and 1.2-4, and Figure 2.2-2. Other general plant arrangement drawings have been removed due to security reasons following September 11, 2001 and can be viewed as plant drawings 9321-2510, 9321-2511, 9321-2514, 9321-2517, 9321-3052, and 209812.

The major structures are the reactor containment building, the primary auxiliary building, the control building, the fuel storage building, the turbine building, and the maintenance and operations building. General layouts of the reactor containment interior components arrangement are shown on Plant Drawings 9321-2501, 9321-2502, 9321-2503, 9321-2506, 9321-2507, 9321-2508 [formally UFSAR Figures 5.1-2 through 5.1-7]. General layouts and interior components arrangement of the primary auxiliary building, control building, fuel storage building, and holdup tank building were removed from the UFSAR due to security reasons following September 11, 2001 and can be viewed on controlled plant drawings.