

August 26, 2002

10 CFR 50.54(f)

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

**PALISADES NUCLEAR PLANT  
DOCKET 50-255  
LICENSE No. DPR-20  
NRC BULLETIN 2002-02: REACTOR PRESSURE VESSEL HEAD AND VESSEL HEAD  
PENETRATION NOZZLE INSPECTION PROGRAMS – 15-DAY RESPONSE**

On August 9, 2002, the Nuclear Regulatory Commission (NRC) transmitted Bulletin (BL) 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs." The NRC required that specific information be provided within 30 days of the date of the bulletin. For addressees who chose not to provide the information requested or could not meet the requested completion date, the NRC required a written response within 15 days of the date of the bulletin. In accordance with this requirement, Nuclear Management Company, LLC (NMC) is providing the attached 15-day response for the Palisades Plant.

This letter contains the following commitment and no revisions to existing commitments:

NMC will continue to evaluate non-visual nondestructive examination (NDE) of the reactor pressure vessel head and vessel head penetration nozzles. NMC will complete this review and select appropriate NDE method(s) and, at least nine months prior to the refueling outage that follows the next refueling outage, provide the remaining requested information as described in BL 2002-02.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on August 26, 2002.

  
Douglas E. Cooper  
Site Vice-President, Palisades

CC Regional Administrator, USNRC, Region III  
Project Manager, Palisades Plant, USNRC, NRR  
NRC Resident Inspector – Palisades Plant

Attachment

**ATTACHMENT 1**

**NUCLEAR MANAGEMENT COMPANY, LLC  
PALISADES NUCLEAR PLANT  
DOCKET 50-255**

**August 2002**

**NRC BULLETIN 2002-02: PALISADES PLANT 15-DAY RESPONSE**

**2 Pages Follow**

NRC BULLETIN 2002-02: REACTOR VESSEL HEAD  
AND VESSEL HEAD PENETRATION NOZZLE INSPECTION PROGRAMS  
PALISADES PLANT 15-DAY RESPONSE

**Required Response 2.**

- (2) *Addressees who choose not to provide the information requested or can not meet the requested completion dates are required to submit written responses within 15 days of the date of this bulletin. The responses must address any alternative course of action proposed, including the basis for the acceptability of the proposed alternative course of action.*

**Response**

**Background**

The effective degradation year (EDY) value for the Palisades Plant will be less than ten at the start of the next refueling outage, which is scheduled to start in Spring 2003. Nuclear Management Company, LLC (NMC) has estimated that the EDY for Palisades Plant will not exceed 12 until at least calendar year 2007.

By letter dated March 29, 2002, NMC committed to perform a 100% effective visual examination of the reactor vessel head upper metal surface for the Palisades Plant in accordance with Nuclear Regulatory Commission (NRC) Bulletin (BL) 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," during the next (Spring 2003) refueling outage. This commitment meets the suggested supplemental inspection in BL 2002-02 for the next refueling outage for plants with  $\geq 8$  EDY and  $\leq 12$  EDY values. Therefore, NMC meets the requested schedule of BL 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs," for activities to be conducted during the Spring 2003 refueling outage for Palisades Plant. The remaining two inspection items noted in BL 2002-02, "Example Supplemental Inspections," table would not apply to Palisades Plant until the refueling outage that follows the Spring 2003 refueling outage.

**Alternate Course of Action**

NMC will continue to evaluate non-visual nondestructive examination (NDE) of the reactor pressure vessel head and vessel head penetration nozzles. NMC will complete this review and select appropriate NDE method(s) and, at least nine months prior to the refueling outage that follows the next refueling outage, provide the remaining requested information as described in BL 2002-02.

NRC BULLETIN 2002-02: REACTOR VESSEL HEAD  
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**Basis for the Acceptability of the Proposed Alternative Course of Action**

The two remaining issues of BL 2002-02 do not require an immediate commitment. Palisades Plant is not expected to reach 12 EDY until at least calendar year 2007, and the refueling outage subsequent to the Spring 2003 refueling outage is not expected to occur until at least Fall 2004. NMC's commitment to respond will provide NMC and the NRC the opportunity to evaluate and develop any changes to the inspection program for the reactor pressure vessel head and vessel head penetration nozzles based on industry experience and inspection and repair technology advancements that are expected to be gained in this interim period.