

March 3, 2003

10 CFR 2.202

Secretary, Office of the Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

PALISADES NUCLEAR PLANT
DOCKET 50-255
LICENSE NO. DPR-20
RESPONSE TO ORDER EA-03-009, "ISSUANCE OF ORDER ESTABLISHING
INTERIM INSPECTION REQUIREMENTS FOR REACTOR PRESSURE VESSEL
HEADS AT PRESSURIZED WATER REACTORS"

By letter dated February 11, 2003, the Nuclear Regulatory Commission (NRC) issued Order EA-03-009, "Issuance of Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors." Nuclear Management Company, LLC (NMC) hereby consents to Order EA-03-009 as written, with one exception. Due to the unique reactor vessel head nozzle design at the Palisades Plant (significant length of the nozzle extending below the J-groove weld), compliance with the requirements of section IV C.(2)(b)(i), to examine to the bottom of the penetration nozzle, would be unnecessary. Therefore, NMC will seek relaxation from this requirement, in accordance with section IV F.(2) of Order EA-03-009, pursuant to 10 CFR 50.55a(a)(3).

NMC made the following commitment in response to Bulletin (BL) 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," by letter dated August 31, 2001.

- Palisades Nuclear Plant will provide the information requested in Item 5 of NRC BL 2001-01, or indicate that no leakage was identified, within 30 days after plant restart following the next refueling outage, which is currently expected to occur in late 2002 or early 2003.

It is NMC's understanding that the 60-day reporting requirement (for reactor head inspection results only), following restart from a refueling outage, supercedes the 30-day reporting requirement. This 30-day reporting requirement was contained in BL 2001-01, BL 2002-01, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity," and in BL 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs."

NMC made the following commitment in an updated response to BL 2001-01, by letter dated March 29, 2002.

- NMC will perform an 100% effective visual examination of the reactor vessel head upper metal surface for the Palisades Plant in accordance with BL 2001-01 during the next refueling outage.

It is NMC's understanding that 100% of the reactor vessel head surface does not include the inside of the studs, inside the lifting lug bolts, etc. unless leakage from an external source could impact these areas.

NMC made the following commitment in a 15-day response to BL 2002-02, by letter dated August 26, 2002.

- NMC will continue to evaluate non-visual nondestructive examination (NDE) of the reactor pressure 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.

SUMMARY OF COMMITMENTS

As a result of the obligations contained in Order EA-03-009, NMC rescinds the three commitments noted above. This letter contains one new commitment.

- NMC will provide a relaxation request to Order EA-03-009, in accordance with 10 CFR 50.55a(a)(3), at least one year prior to the next refueling outage.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on March 3, 2003.



Douglas E. Cooper
Site Vice-President, Palisades Nuclear Plant

CC Regional Administrator, USNRC, Region III
 Director, Office of Nuclear Reactor Regulation
 Assistant General Counsel for Materials Litigation and Enforcement
 Project Manager, USNRC, NRR
 NRC Resident Inspector, Palisades
 Document Control Desk