



August 19, 2004

10 CFR 50.55a

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Palisades Nuclear Plant  
Docket 50-255  
License No. DPR-20

Revised Letter on Request for Relief from ASME Section XI Code Requirements for Repair of  
Reactor Pressure Vessel Head Penetrations

By letter dated August 2, 2004, Nuclear Management Company, LLC (NMC) submitted requests for relief from American Society of Mechanical Engineers Section XI code requirements for repair of the reactor pressure vessel head penetrations. Included in this submittal was an affidavit dated August 4, 2004. Due to this date discrepancy, NMC is providing a revised letter, which is dated August 19, 2004. The remainder of the submittal, including the letter contents, the enclosures and the attachments, remain unaffected.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

*D. J. Malone for Dan J. Malone*

Daniel J. Malone  
Site Vice President, Palisades Nuclear Plant  
Nuclear Management Company, LLC

Enclosure (1)

cc: Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC

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Request for Relief from ASME Section XI Code Requirements for Repair of Reactor Pressure Vessel Head Penetrations

Nuclear Management Company, LLC (NMC) is performing ultrasonic examinations of the reactor vessel closure head (RVCH), control rod drive (CRD), and incore instrumentation (ICI) nozzle penetrations during the upcoming refueling outage at the Palisades Nuclear Plant, in accordance with Order, EA-03-009, "Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," dated February 20, 2004. NMC requires the enclosed relief requests in the event a RVCH penetration is in need of a repair at Palisades. Therefore, NMC requests relief from certain sections of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 1989 Edition, as described in the attached Enclosures.

Enclosure 1 requests relief from the ASME Code, Section XI, IWA-4120, "Rules and Requirements." NMC proposes an alternative to the specified code requirements in accordance with 10 CFR 50.55a(a)(3)(i). The basis for the relief is provided, describing that the alternative provides an acceptable level of quality and safety.

Enclosure 2 requests relief from the ASME Code, Section XI, IWA-3300, "Flaw Characterization," IWB-3142.4, "Acceptance by Analytical Evaluation," and IWB-3420, "Characterization." NMC proposes an alternative to the specified code requirements in accordance with 10 CFR 50.55a(a)(3)(i). The basis for the relief is provided, describing that the alternative provides an acceptable level of quality and safety.

NMC will implement a Framatome Advanced Nuclear Products (FANP) design repair, for the Palisades Nuclear Plant, if a RVCH penetration repair is necessary. FANP performed the detailed analyses to justify this repair technique at Palisades Nuclear Plant. NMC has reviewed and approved these analyses. The analyses that support the relief requests are included as Attachments to the Enclosures. The analyses are as follows:

Attachment 2 to Enclosure 1 - AREVA Document 32-5043862-00, "Palisades CRDM Nozzle IDTB Weld Anomaly Flaw Evaluations," dated July 2004 (Proprietary)

Attachment 3 to Enclosure 1 - AREVA Document 32-5045260-00, "Palisades ICI Nozzle IDTB Weld Anomaly Flaw Evaluations," dated July 2004 (Proprietary)

Attachment 1 to Enclosure 2 - AREVA Document 32-5044161-00, "Palisades CRDM Nozzle IDTB J-Groove Weld Flaw Evaluation," dated July 2004 (Proprietary)

Attachment 2 to Enclosure 2 - AREVA Document 32-5045743-00, "Palisades ICI Nozzle IDTB Weld Flaw Evaluation," dated July 2004 (Proprietary)

NMC has reviewed the Nuclear Regulatory Commission Regulatory Issue Summary 2004-11, "Supporting Information Associated With Requests For Withholding Proprietary Information," dated June 29, 2004. The attached AREVA Proprietary documents are marked according to the requirements set forth in 10 CFR 2.390.

A FANP proprietary authorization affidavit supporting the above calculations is included with the AREVA documents. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in 10 CFR 2.390.

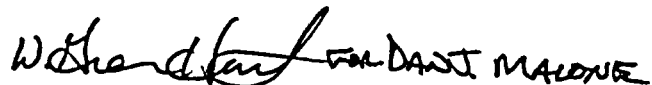
NMC requests that the above Attachments, which are proprietary to FANP, be withheld from public disclosure in accordance with 10 CFR 2.390. Correspondence regarding the proprietary aspects of the items listed above, or the supporting FANP affidavit, should reference the affidavit and be addressed the J.F. Mallay, Director Regulatory Affairs, Framatome ANP, Inc., 3315 Forest Road, P.O. Box 10935, Lynchburg, Virginia, 24506-0935.

Relief is requested for the remainder of the current ten-year inspection interval, which will conclude on or before December 12, 2006.

NMC requests approval of the proposed relief requests by October 1, 2004, to support Palisades Nuclear Plant's upcoming refueling outage.

#### Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.



Daniel J. Malone  
Site Vice President, Palisades Nuclear Plant  
Nuclear Management Company, LLC

Enclosures (2)  
Attachments (5)

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cc: (with Enclosures and Attachments)  
Project Manager, Palisades, USNRC

cc: (with Enclosures without Attachments)  
Administrator, Region III, USNRC  
Resident Inspector, Palisades, USNRC