



October 22, 2004

10 CFR 50, Appendix E

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

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

Revision to Emergency Action Levels

Nuclear Management Company, LLC, (NMC) is transmitting for NRC review and approval, revisions to the Palisades Nuclear Plant (PNP) emergency action levels (EALs). This revision implements new EALs based on NEI 99-01, Revision 4, "Methodology for Development of Emergency Action Levels," using the guidance of Regulatory Issue Summary (RIS) 2003-18, Supplement 1, "Use of Nuclear Energy Institute (NEI) 99-01, 'Methodology for Development of Emergency Action Levels,'" dated July 13, 2004.

The enclosed security EALs are in compliance with NEI 99-01, Revision 4, but are not aligned with the "Order For Interim Safeguards and Security Compensatory Measures for – Palisades Plant," dated February 25, 2002. The PNP response to that Order is dated September 5, 2002. The NRC has indicated that additional security EALs are being developed for threat advisories. If revised security EALs are issued before the enclosed EALs are approved, NMC will provide a supplement to reflect the updated security EALs. NMC intends to remain in compliance with the security EALs in the September 2002 security Order response, as modified by the threat advisories, until the NRC approves new security EALs for PNP.

On July 23, 2004, PNP submitted "Request for Approval of Emergency Action Level Changes." The request was related to a modification that abandoned the failed fuel monitor in place, which affected the fission product barrier EAL. NMC requests that the letter dated July 23, 2004, be withdrawn. The enclosed EAL scheme includes EALs with site-specific methods for detection of failed fuel.

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The current EAL scheme in use at Palisades is based on NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

This request contains the following enclosures:

- Enclosure 1: Table of Contents
- Enclosure 2: Summary Explanation
- Enclosure 3: State/Local Government Official Agreement Documentation
- Enclosure 4: Detailed Supporting Information
- Enclosure 5: Compact disk of Enclosures, References, and Supporting Documentation

These proposed EALs have been discussed and agreed to by applicable state and local government officials, and have been reviewed and approved by the Plant Review Committee.

It is requested that the enclosed EAL revision be approved by November 1, 2005.

Summary of Commitments

This letter contains one new commitment and no revisions to existing commitments. The new commitment is:

If revised security EALs are issued before the enclosed EALs are approved, NMC will provide a supplement to reflect the updated security EALs.



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

Enclosures (5)

CC Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC (w/o encl.)  
Spent Fuel Project Office, USNRC (w/o encl.)

**ENCLOSURE 1  
TABLE OF CONTENTS**

Enclosure 2 contains the Summary Explanation, or Executive Summary.

Enclosure 3 contains the State and Local Government Official Agreement Documentation.

Enclosure 4 contains the Detailed Supporting Information and is divided into four attachments:

- Attachment 1: Red-line of the Technical Basis Document
- Attachment 2: Clean copy of the Technical Basis Document
- Attachment 3: Justification Matrix
- Attachment 4: Emergency Plan Changes

Enclosure 5 contains two compact disks of enclosures, references and supporting documentation.