

June 3, 2005

Daniel J. Malone
Site Vice President
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION (RAIs) FOR THE REVIEW OF
THE PALISADES NUCLEAR PLANT, LICENSE RENEWAL APPLICATION
(TAC NO. MC6433)

Dear Mr. Malone:

By letter dated March 22, 2005, Nuclear Management Company, LLC, (NMC or the applicant) submitted an application pursuant to 10 CFR Part 54, to renew the operating licenses for Palisades Nuclear Plant (PNP), for review by the U.S. Nuclear Regulatory Commission (NRC). Subsequently, on May 5, 2005, the NRC received a supplement to the license renewal application. The NRC staff is reviewing the information contained in the license renewal application (LRA) and supplement and has identified, in the enclosure, areas where additional information is needed to complete the review.

These RAIs were discussed with your staff, Robert Vincent, and a mutually agreeable date for this response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-2232 or e-mail MJM2@nrc.gov.

Sincerely,

/RA/(D. Ashley for)

Michael J. Morgan, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No.: 50-255

Enclosure: As stated

cc w/encl: See next page

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Palisades Nuclear Plant

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Palisades Nuclear Plant

- 2 -

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DISTRIBUTION: Letter to D. Malone, Re: RAIs for Palisades LRA, Dated: June 3 ,2005
ADAMS Accession No.: ML051540237

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**PALISADES NUCLEAR PLANT
LICENSE RENEWAL APPLICATION (LRA)
REQUESTS FOR ADDITIONAL INFORMATION (RAIs)**

RAI-A1.0-1

Please include a schedule of implementation and description of any commitments as part of the Aging Management Program (AMP) and time-limited aging analysis (TLAA) descriptions in the USAR Supplement in Appendix A of the license renewal application (LRA).

RAI-B2.1.2-1

Please define the ASME Code Edition for Inservice Inspection (ISI) Program B2.1.2.

RAI-B2.1.5-1

Please identify the inspection frequency for the buried piping aging management program B2.1.5.

RAI-2.1.1-1

No license renewal (LR) system boundary flags or other means of identifying LR system boundaries appear on the scoping boundary drawings. Please identify the LR system boundaries in these drawings.

RAI-2.2-1

For the various "component group/intended function AMR tables" listed in Section 2 of the LRA, please clearly identify the specific components that comprise the listed component types and groups.

RAI-2.3.1-1

In the initial review of the LRA it was noted that flange leak detection lines are not presented. The staff believes that these components have intended functions. Please provide your technical basis if they are not in scope for license renewal.

RAI-2.3.2-1

Please provide separate system description, system function listing, FSAR reference, scoping boundary drawings, and components subject to an aging management review (AMR) for each of the 9 systems that have been integrated in the Engineered Safety Features (ESF) section of the LRA.

RAI-2.3.4-1

In the initial review of the LRA it was noted that the steam generator feedwater inlet ring is not presented. The staff believes that this component has intended functions. Please provide your technical basis if it is not in scope for license renewal.

RAI-2.4-1

Crane rail supports, hoists, and lifting devices are not explicitly identified as in scope for license renewal in the LRA. They are usually in the scope of license renewal. Please confirm that they are in scope and identify their location in the LRA, or provide technical justification if they are not in scope.

Enclosure

**PALISADES NUCLEAR PLANT
LICENSE RENEWAL APPLICATION (LRA)
REQUESTS FOR ADDITIONAL INFORMATION (RAIs)
(continued)**

RAI-3.1-1

During an initial review of the AMRs and associated evaluations in the LRA, it was not apparent how you intend to manage thermal sleeve aging effects. Please provide information on how you plan to manage aging of thermal sleeves.

RAI-3.1.2-1

AMPs that note “one-time inspections” should identify an acceptable form of inspection method for various types of situations. The LRA does not identify any specific methods of inspection. The LRA simply provides a general statement that examination techniques will be visual, volumetric, or other appropriately established NDE methods. Please identify the inspection methods for each “one-time inspection” listed.

RAI-3.1.2.2-1

The LRA states that an augmented inspection for steam generator shell assemblies for loss of material due to pitting/crevice corrosion is not applicable for Palisades. NUREG-1801, “Generic Aging Lessons Learned (GALL) Report” recommends such augmented inspection based on industry experience and extended exposure of the shell material to the water environment. Please provide technical justification for your determination.

RAI-3.1.2.2.7.2-1

The AMP for Cast Austenitic Stainless Steel (CASS) thermal embrittlement in the LRA does not include a flaw tolerance evaluation or enhanced volumetric inspection as recommended in the GALL report. Please clarify and discuss your basis.

RAI-3.2.1-1

The flow assisted corrosion (FAC) program is not listed as an AMP in Sections 3.2.1 & 3.2.3 of the LRA. Such a program is typically necessary to manage the effects of FAC for license renewal. Please verify whether you intend to credit this AMP, B2.1.11, in these sections.

RAI-3.6.2-1

In the notes area for Table 3.6.2-1 (and in other notes for other tables) various components are described; however, they are not specified in the associated table. For example, are neutron monitoring cables and uninsulated ground conductors in scope for license renewal? Where are they located in the associated LRA tables?

RAI-4.5-1

Please provide the containment tendon prestress test data from past surveillance.

RAI-4.7.5-1

The LRA states that the reactor coolant pump fly wheel is not considered as a TLAA. However, based on past review experience, the staff believes that this is a TLAA. Please provide the TLAA evaluations in accordance with 54.21(c)(1) or provide further technical justification that it is not a TLAA.