

July 26, 2005

Paul A. Harden
Site Vice President
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043

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

Dear Mr. Harden:

By letter dated March 22, 2005, Nuclear Management Company, LLC, (NMC or the applicant) submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54), to renew the operating license 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.

The question was discussed with your staff, Mr. 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 via e-mail at MJM2@nrc.gov.

Sincerely,

/RA/ (S. Lee 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

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cc:

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DISTRIBUTION: Letter to P. Harden, Re: RAIs for Palisades LRA, Dated: July 26, 2005
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**PALISADES NUCLEAR PLANT
LICENSE RENEWAL APPLICATION (LRA)
REQUEST FOR ADDITIONAL INFORMATION (RAI)**

RAI 3.4-1 - Evaluation of Thermal Insulation

During a sampling of systems, the NRC staff noted that the Auxiliary Feedwater (AFW) System Pump Room piping insulation was not within the scope of license renewal. To support this determination, the applicant provided an engineering analysis that calculated AFW room temperature with a loss of ventilation, but with the piping insulation installed. The applicant stated in the LRA that there are no locations where insulation on piping and components is credited to reduce heat transfer for individual room heat load calculations in support of accident analyses. The applicant further stated that other rooms containing safety-related equipment had analyses performed that did not credit insulation to reduce heat transfer in support of accident analyses. However, in case of AFW, there was no documentation presented to the staff to prove that the thermal insulation is not credited to reduce room temperatures and prevent a loss of system intended function.

- Based on the above, the staff requests the applicant provide justification that the pipe insulation in the AFW Pump Room is not required to ensure temperatures remain below the values that could cause safety-related equipment in the room to fail. Otherwise, please provide the aging management review and program for the insulation.

Enclosure