



September 2, 2005

10 CFR 54

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

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

NMC Responses to Follow Up Questions from License Renewal Aging Management Review and Aging Management Program Audits

On August 22, 2005, several follow up questions were received regarding the NRC audits of Aging Management Review (AMR) and Aging Management Program (AMP) information described in the Application for Renewed Operating License – Palisades Nuclear Plant, dated March 22, 2005. In addition, during discussions with the NRC about NMC responses to two AMP audit questions (#12 and #39) contained in an NMC letter dated August 25, 2005, it was determined that further clarification of those responses is warranted.

Enclosure 1 provides the text of, and the NMC response to, each of the AMP and AMR audit follow up questions. Enclosure 2 provides the text of, and the clarified responses to, the two previous AMP audit questions.

Please contact Mr. Darrel Turner, License Renewal Project Manager, at 269-764-2412, or Mr. Robert Vincent, License Renewal Licensing Lead, at 269-764-2559, if you require additional information.

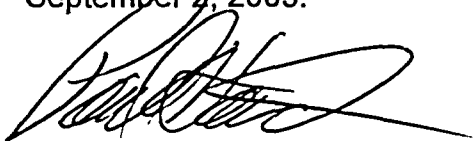
Summary of Commitments

This letter revises one Preliminary Commitment (i.e., subject to acceptance in the NRC SER for the renewed operating license), identified in NMC letter dated March 22, 2005, as follows:

Preliminary Commitment 6 in Enclosure 2 of the Palisades LRA transmittal letter dated March 22, 2005, is hereby revised to read as follows: "NMC will update the Alloy 600 Program to reflect the latest regulatory requirements and plant commitments at the time of submittal. The revised Alloy 600 Program description will be submitted for NRC review and approval by March 24, 2008."

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I declare under penalty of perjury that the foregoing is true and correct. Executed on September 2, 2005.



Paul A. Harden
Site Vice President, Palisades Nuclear Plant
Nuclear Management Company, LLC

Enclosures (2)

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC
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ENCLOSURE 1

**NMC Responses to Follow Up Questions from License Renewal Aging
Management Review and Aging Management Program Audits**

(18 Pages)

Enclosure 1

NMC Responses to Follow Up Questions from License Renewal Aging Management Review and Aging Management Program Audits

NRC Question 1

The PNP Structural Monitoring Program AMP does not discuss the need or lack of need to perform periodic ground water monitoring to ensure that the below -grade water chemistry does not become aggressive in the future. Justify not performing periodic ground water monitoring during the CLB and potential extended license period to check water chemistry for non-aggressiveness. [NMC Tracking No.628]

NMC Response to NRC Question 1

As discussed in LRA Section 3.5.2.2.1.1, on pages 3-269 - 3-271, ground water chemistry records are available for the current operating period, and provide the basis that water in contact with Palisades' below-grade concrete is currently non-aggressive, and has been non-aggressive over at least the last 40 years. To ensure ground water remains non-aggressive over the extended operating period, ground water sampling for pH, chlorides, and sulfates will be performed as part of the Structural Monitoring Program with a periodicity not to exceed every 5 years.

Accordingly, the following changes are hereby made to LRA Section B2.1.19:

On page B-137, after the last paragraph of the section entitled "Program Description", the following paragraph is added: "For below grade inaccessible concrete, Interim Staff Guidance #3 (ISG-3) discusses potential aging effects requiring management (AERMs) if the below grade environment is aggressive (pH < 5.5, chlorides > 500 ppm, or sulfates > 1500 ppm). Historical groundwater sampling performed at Palisades shows that the below grade environment is, and has been, non-aggressive by a significant margin. As part of the Structural Monitoring Program, Palisades will continue to monitor groundwater on a periodic basis to ensure it remains non-aggressive such that the associated AERMs remain not applicable."

On page B-140, after the last paragraph of the section entitled "XI.S6, Structures Monitoring", under "Parameters Monitored, Inspected, and/or Tested", the following paragraph is added: "Local groundwater will be sampled on a periodic basis to ensure pH values and concentrations of chlorides and sulfates remain below levels considered aggressive to concrete."

On page B-142, after the last paragraph of the section entitled "XI.S6, Structures Monitoring", under "Monitoring and Trending", the following paragraph is added: "Groundwater sampling for pH, chlorides, and sulfates will be performed to ensure the below grade environment remains non-aggressive with a periodicity not to exceed every 5 years."

On page B-143, after the last paragraph of the section entitled "XI.S6, Structures Monitoring", under "Acceptance Criteria", the following paragraph is added:

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"Groundwater sampling will verify a non-aggressive below grade environment exists, as described in ISG-3, by ensuring pH \geq 5.5, chlorides \leq 500 ppm and sulfates are \leq 1500 ppm.

In addition to the program changes, conforming changes are made in various locations of LRA Section 3.5.2.2 which currently state that continued groundwater sampling is unnecessary. The new paragraph to be added reads as follows: "As part of the Structural Monitoring Program, Palisades will continue to monitor groundwater on a periodic basis to ensure it remains non-aggressive, such that the associated aging effects remain not applicable." This new paragraph is hereby added to the following LRA locations, to replace the existing paragraphs, as follows:

On page 3-271, replace existing paragraph that begins, "In addition it is concluded that additional groundwater monitoring ..."

On page 3-273, replace existing paragraph that begins, "In addition it is concluded that additional groundwater monitoring ..."

On page 3-286, replace existing paragraph that begins, "It is also concluded that it is not necessary to monitor groundwater chemistry ..."

On page 3-289, replace existing paragraph that begins, "It is also concluded that it is not necessary to monitor groundwater chemistry ..."

On page 3-297 replace existing paragraph that begins, "It is also concluded that formal groundwater monitoring ..."

On page 3-298, replace existing paragraph that begins "It is also concluded that formal groundwater monitoring ..."

A conforming change is also made to the FSAR description of the Structural Monitoring Program in LRA Section A2.19, by adding the following sentence at the end of the first paragraph, "As part of the Structural Monitoring Program, groundwater sampling for pH, chlorides, and sulfates will be performed, with a periodicity not to exceed every 5 years, to ensure the below grade environment remains non-aggressive."

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NRC Question 2

The PNP Structural Monitoring Program AMP does not discuss the need or lack of need to perform periodic ground water monitoring to ensure that the below -grade water chemistry does not become aggressive in the future. Justify not performing periodic ground water monitoring during the CLB and potential extended license period to check water chemistry for non-aggressiveness. [NMC Tracking No. 629]

NMC Response to NRC Question 2

See response to NRC Question 1 above. This question is a duplicate.

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NRC Question 3

In LRA table 3.5.2.-8 (table 2) on page 3-364 for component type Fire Barrier- Auxiliary Bldg - Concrete, Protected, explain why a GALL volume 2 line item and a table 1 item are shown with a note H for the aging effect loss of material. The audit team feels that these two columns should be blank with a note H. [NMC Tracking No. 630]

NMC Response to NRC Question 3

NMC concurs. Therefore, in LRA Table 3.5.2.-8 on page 3-364, for the Loss of Material AERM of component type Fire Barrier- Auxiliary Bldg - Concrete, Protected, the NUREG 1801 Volume 2 and Table 1 entries for Fire Protection Program and Structural Monitoring Program are hereby deleted.

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NRC Question 4

In LRA table 3.5.2.-8 (table 2) on page 3-364 for component type Fire Barrier- Auxiliary Bldg - Fire Stop, Protected, explain why a GALL volume 2 line item and a table 1 item are shown with a note H for the aging effect loss of material. The audit team feels that these two columns should be blank with a note H. Also applies to LRA table 3.5.2-8 on page 3-366 for component type Fire Barrier - Intake Structure Bldg - Fire Stop, Protected for aging effect loss of material; to LRA table 3.5.2-8 on page 3-368 for component type Fire Barrier - Turbine Bldg - Fire Stop, Protected for aging effect loss of material and to LRA table 3.5.2-8 on page 3-370 for component type Fire Barrier - Water Treatment Bldg - Fire Stop, Protected for aging effect loss of material. [NMC Tracking No. 631]

NMC Response to NRC Question 4

NMC concurs. Therefore, in LRA Table 3.5.2.-8 on page 3-364, for the Loss of Material AERM of component type Fire Barrier- Auxiliary Bldg - Fire Stop, Protected, the NUREG 1801 Volume 2 and Table 1 entries for Fire Protection Program are hereby deleted.

The same deletions of NUREG 1801 Volume 2 and Table 1 information are also made to the Loss of Material AERMs of the following additional line items of Table 3.5.2-8 which have standard Note H:

- page 3-366, Fire Barrier - Intake Structure Bldg - Fire Stop, Protected
- page 3-368, Fire Barrier - Turbine Bldg - Fire Stop, Protected
- page 3-370, Fire Barrier - Water Treatment Bldg - Fire Stop, Protected

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NRC Question 5

In the discussion column of Table 3.3.1, Item 24 of the PNP LRA, the applicant refers to the boric acid corrosion monitoring, one time inspection, and system monitoring programs for managing loss of material of the closure bolting. GALL Volume 1, Table 3 recommends bolting Integrity program for this line item. LRA Tables 3.3.2-1, 3.3.2-2, 3.3.2-3 , 3.3.2-5, 3.3.2-7, 3.3.2-8, 3.3.2-9, 3.3.2-11, 3.3.2-12, 3.3.2-13, 3.3.2-14, and 3.3.2-15 credits bolting integrity program for managing loss of material aging effect for carbon steel and low alloy steel fasteners in air and reference GALL VII.I.2-a and Table 3.3.1, Item 24. Please clarify this discrepancy between LRA Table 1 item 24 and the above mentioned Table 2s line items. [NMC Tracking No. 632]

NMC Response to NRC Question 5

The Discussion of Table 3.3.1, Item 24, on page 3-117, is in error. The discussion entry for this line item is hereby changed to, "See Section B2.1.3, Bolting Integrity Program, for aging management program."

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NRC Question 6

In LRA Section 3.3.2.5, the applicant states that the Open Cycle Cooling Water program is credited for the internal environments of applicable auxiliary systems and external surfaces of carbon steel components in auxiliary systems for managing the aging effect of loss of material. However, the open cycle cooling water program is not used in Table 2 line items where this Table 1 item is addressed. Clarify this discrepancy. Response needs to be docketed. [NMC Tracking No. 633]

NMC Response to NRC Question 6

It is assumed the question pertains to LRA Section 3.3.2.2.5 rather than 3.3.2.5. LRA Section 3.3.2.2.5, page 3-104, 4th paragraph, erroneously includes reference to the Open Cycle Cooling Water Program. This paragraph is hereby changed to read, "For the external surfaces of carbon steel components in auxiliary systems, the System Monitoring Program is credited for managing the aging effect of loss of material. The Fire Protection Program is credited to augment the System Monitoring Program for managing external aging effects in the Fuel Oil System. Closure bolting is managed by the Bolting Integrity Program."

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NRC Question 7

On page 3-59, only water chemistry is used for loss of material from the instrument nozzles. How is the effectiveness of the wc program to be verified? (Note that ISI is also applied to this component type to manage cracking.) [NMC Tracking No. 634]

NMC Response to NRC Question 7

Water chemistry is verified using the ISI Program. For clarification, to the Table 3.1.2-4 line item for Wide and Narrow Range level Nozzles, Sampling and Instrument Nozzles, to the Loss of Material AERM for Treated Water, add ASME Section XI IWB, IWC, IWD, IWF Inservice Inspection Program with NUREG 1801 Volume 2, Table 1 Notes IV.D1.1-c, 3.1.1-02, and Note C, respectively.

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NRC Question 8

On page 3-59, cracking of instrument nozzles is managed but 3.1.1-02 is identified. Please clarify why 3.1.1-12 was not used. [NMC Tracking No. 635]

NMC Response to NRC Question 8

3.1.1-12 is not used because it is for primary system components. The instrument nozzles being evaluated on page 3-59 are for the secondary side of the steam generator and are constructed of low-alloy steel. Since the normal operating temperatures of the nozzles are >210F, it is not necessary to list cracking as an AERM.

Therefore, In Table 3.1.2-4, for the line item "Wide and Narrow Range level Nozzles, Sampling and Instrument Nozzles", on page 3-59, the AERM "Cracking" and its associated NUREG 1801 Volume 2, Table 1 and Notes are hereby deleted.

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NRC Question 9

On page 3-41, for the PC sample heat exchanger shell, please confirm that 3.2.1-13 was intended or make some other correction to the AMR. [NMC Tracking No. 636]

NMC Response to NRC Question 9

3.2.1-13 was the intended Table 1 alignment. Therefore, in Table 3.1.2-1, on page 3-41, for the line item Primary Coolant Pump Sample Heat Exchanger Shell, Loss of Material in Treated Water, the Table 1 entry is hereby changed from 3.1.1-13 to 3.2.1-13.

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NRC Question 10

On page 3-44, flanges are associated with the item for bolting. An alternative Table 1 item number (and Note) is needed. [NMC Tracking No. 637]

NMC Response to NRC Question 10

In Table 3.1.2-2, on page 3-44, the component type "Incore Instrument Closure Flanges" is hereby changed to "CRDM/Incore Instrument Closure Flanges". The existing NUREG 1801 Volume 2, Table 1 and Notes entries of IV.A2.2-f, 3.1.1-26, and C in the Containment Air (Ext) environment are correct for these flanges.

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NRC Question 11

On page 3-40, this Table 1 item is applied to pump casings of CASS. In Table 1, the item explicitly excludes CASS, and therefore should not be applied to the CASS valve bodies and pump casings. [NMC Tracking No. 638]

NMC Response to NRC Question 11

In Table 3.1.2-1, on page 3-40, for the Primary Coolant Pump Casing AERM, Cracking, the Table 1 and Notes entries are hereby changed from 3.3.1-36, A to 3.1.1-13, C.

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NRC Question 12

On page 3-37, GALL v2 Item IV.C2.2-h appears for Alloy 600 safe ends. This GALL Item refers to stainless steel components and does not appear to be appropriate. Please clarify. [NMC Tracking No. 639]

NMC Response to NRC Question 12

The GALL Volume 2 items referenced are IV.C2.2-f and IV.C2.5-h, and are for stainless steel. Therefore, in LRA Table 3.1.2-1, on page 3-37, for the component type Alloy 600 Safe Ends, the existing NUREG 1801 Volume 2, Table 1 and Notes entries for both the Alloy 600 Program and Water Chemistry Program are hereby deleted. New NUREG 1801 Volume 2, Table 1 and Notes entries for both the Alloy 600 Program and Water Chemistry Program are IV.C2.5-s, 3.1.1-14, and Note E.

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NRC Question 13

On page 3-38, GALL v2 Item IV.C2.2-f appears twice for the water chemistry AMP applied to non-CASS valves. Is this a duplication, or is there a different GALL Item that was intended? [NMC Tracking No. 640]

NMC Response to NRC Question 13

In LRA Table 2.1.3-1, on page 3-38, for the component type Non-CASS Valves in PCS and Connected Systems, the second IV.C2.2-f entry for the Water Chemistry Program is a duplicate. This entry is hereby deleted.

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NRC Question 14

On page 3-40, loss of material from the internal surface of the quench tank is managed using the system monitoring program. The environment is listed as containment air. Is this correct? According to the PNP FSAR section 4.3.8, the tank is normally filled with nitrogen, which would seem an appropriate basis for use of the system monitoring AMP in lieu of the BAC program. [NMC Tracking No. 641]

NMC Response to NRC Question 14

In Table 3.1.2-1, the first component type on page 3-40, Pressurizer Quench Tank, is for the tank interior environment only. No external environment should be listed. Therefore, the entries Containment Air (Ext) and the associated AERM, NUREG 1801 Volume 2, Table 1, and Notes entries are hereby deleted from this component type. The remaining entries for the Treated Water (Int) environment are unchanged.

The second line item on page 3-40, Pressurizer Quench Tank Shell and Heads, addresses the external surface of the tank, and credits the Boric Acid Corrosion Program for aging management.

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NRC Question 15

On page 3-53 of the LRA, Note F implies that GALL specifies a material. It does not. GALL also recommends using water chemistry. Please provide the basis for managing this aging effect using only RVI Internals. [NMC Tracking No. 642]

NMC Response to NRC Question 15

The GALL Volume 2 reference is an error. Therefore, in LRA Table 3.1.2-3 on page 3-53, for the component type, Instrument Sleeve, and AERM Reduction in Fracture Toughness, the NUREG 1801 Volume 2 entry is hereby changed from IV.B3.2-e to IV.B3.3-a, and the Note is changed from F to C.

In addition, for the Reduction in Fracture Toughness AERM of component type Instrument Sleeve, the additional AMP, Water Chemistry Program, is hereby added with NUREG 1801 Volume 2, Table 1 and Notes entries of IV.B3.3-a, 3.1.1-43, and C, respectively.

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NRC Question 16

On page 3-51 of the PNP LRA, GALL volume 1 associates item B3.3-a with 3.1.1-43, which addresses crack initiation and growth, dimension/void swelling, in addition to 3.1.1-45, which addresses crack initiation and growth. (Application of the RVI and WC program is consistent with GALL.) [NMC Tracking No. 643]

NMC Response to NRC Question 16

Discussion with the auditor indicates the line item in question is the last line item on page 3-51.

In LRA Table 3.1.2-3, on page 3-51, for the component type "Instrument Guide Tube, Guide Tube Bracket, Guide Tube Plugs, Guide Tube Plug Screw, Guide Tube Support", for the Reduction in Fracture Toughness AERM, the Table 1 entry is hereby changed from 3.1.1-45 to 3.1.1-43. In addition, for this Reduction in Fracture Toughness AERM, the additional AMP, Water Chemistry Program, is hereby added with NUREG 1801 Volume 2, Table 1 and Notes entries of IV.B3.3-a, 3.1.1-43, and C, 113, respectively.

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NRC Question 17

On page 3-56 of the PNP LRA, loss of material from the low-alloy steel tube bundle wrapper is managed using only the water chemistry program. In the precedent tables, Item D1-8 is cited, but this calls for both the water chemistry program and the SG Tube Integrity Program. Please identify how the effectiveness of the WC program will be verified. [NMC Tracking No. 644]

NMC Response to NRC Question 17

The effectiveness of the Water Chemistry Program will be verified through the Steam Generator Tube Integrity Program. Therefore, in Table 3.1.2-4, on page 3-56, for the Tube Bundle Wrapper Loss of Material AERM, the additional AMP, Steam Generator Tube Integrity Program, is hereby added with NUREG 1801 Volume 2, Table 1 and Notes entries of IV.D1.1-c, 3.1.1-2, and E, respectively. For the existing Water Chemistry Program entry for the Loss of Material AERM, the NUREG 1801 Volume 2, Table 1 and Notes are changed to IV.D1.1-c, 3.1.1-2, and C, respectively.

Enclosure 2
Revisions of Responses to NRC AMP Audit Questions 12 and 39 in NMC Letter
Dated August 25, 2005

(2 Pages)

Enclosure 2
Revisions of NMC Responses to NRC AMP Audit Questions 12 and 39 in NMC
Letter Dated August 25, 2005

Revised Response to NRC Question 12 in NMC Letter dated August 25, 2005

NRC Question 12

The response to Bulletin 2004-01 is for PZR penetration and steam space piping connection. The response does not address other RCS PWSCC locations. Please provide description how other PWSCC locations are addressed. [NMC Tracking No. 86]

Revised NMC Response to NRC Question 12

NMC's use of the term "Alloy 600 penetrations" to describe various nickel alloy components, and the program title "Alloy 600 Program" rather than "Nickel Alloy Program", were not intended to exclude nickel alloys other than Alloy 600, nor configurations (e.g., butt welds) other than penetrations. Use of the term "Alloy 600" was simply carried over from existing terminology embedded in various plant documents and the Aging Management Program title. When the LRA refers to Alloy 600 penetrations or components, (other than when describing a specific component), the terms encompass nickel alloys of any configuration (i.e., "nickel alloy component locations") in the environments of interest. Consistent with this interpretation, the previous response to this question is revised as follows:

The Palisades Plant has 251 nickel alloy component locations, all of which are contained within the primary coolant system (PCS). The reactor vessel contains two nickel alloy locations, which are two (2) Reactor flange leak detector taps. The reactor pressure vessel head has 54 nickel alloy locations, which are categorized as follows: (45) - Control Rod Drive (CRD) nickel alloy nozzles that are J-welded at the reactor head inner-diameter (ID) and then butt-welded to the CRD flange above the reactor head; (8) Incore instrumentation (ICI) nozzles that are J-welded at the reactor head ID and then butt-welded to the ICI flange above the reactor head; (1) - Reactor vent line nozzle that is J-welded at the reactor head ID and then butt-welded to the reactor vent line above the reactor head. The pressurizer contains 136 nickel alloy locations, which are categorized as follows: (1) 3-inch ID X 6-inch outer diameter (OD) PORV nozzle located in the upper head; (1) 4-inch spray line nozzle assembly; (1) 12-inch surge line nozzle; (3) 3-inch ID X 6-inch OD valve nozzles; (8) 1-inch level nozzles, four upper and four lower; (2) 1-inch temperature element nozzle locations; (120) - Pressurizer heater penetrations, which are J-welded to the internal cladding of the vessel lower head. Each steam generator contains two (total of 4) nickel alloy locations, which are the bowl plugs. The primary coolant piping contains 55 nickel alloy locations, which are categorized as follows: (4) -12-inch, schedule 140, safety injection and shutdown cooling inlet nozzles; (1) - 12-inch, schedule 140, shutdown cooling outlet nozzle; (1) 12-inch schedule 140 surge nozzle; (22) - Temperature measurement, Inconel SB-166 nozzles on the primary loops; (1) 2-inch, schedule 160 hot leg drain; (4) - 2-inch, schedule 160 cold leg drains; (10) - 3/4-inch, schedule 160, pressure measurement and sampling nozzles; (8) - 3/4-inch, schedule 160, pressure measurement nozzles; (2) - 3-inch, schedule 160 spray nozzles; (2) - 2-inch, schedule 160 charging inlet nozzles.

Enclosure 2
Revisions of NMC Responses to NRC AMP Audit Questions 12 and 39 in NMC
Letter Dated August 25, 2005

Revised Response to NRC Question 39 in NMC Letter dated August 25, 2005.

NRC Question 39

Enclosure 2 to the transmittal letter for the PNP LRA is a table of preliminary commitments related to license renewal. The project team notes that it will be necessary for the staff to review and approve the Alloy 600 program prior to the period of extended operation, and will require adequate time to do so. Please revise the commitment to submit the re-evaluations (those discussed in item 6 of the table) for review at least 24 months prior to the period of extended operation to allow adequate time for NRC staff review and approval prior to the period of extended operation. [NMC Tracking No. 589]

NMC Revised Response to NRC Question 39

This revised response addresses draft NRC RAI 4.7.2-6 (received on August 25, 2005), requesting the revised AMP be submitted three years prior to the period of extended operation, as well an NRC request on August 31, 2005 that the preliminary commitment be reworded.

Accordingly, Preliminary Commitment 6 in Enclosure 2 of the Palisades LRA transmittal letter dated March 22, 2005, is hereby revised to read as follows:

NMC will update the Alloy 600 Program to reflect the latest regulatory requirements and plant commitments at the time of submittal. The revised Alloy 600 Program description will be submitted for NRC review and approval by March 24, 2008.