



October 6, 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 Response to NRC Requests for Additional Information Dated September 8, 2005  
Relating to License Renewal for the Palisades Nuclear Plant

In a letter dated September 8, 2005, the Nuclear Regulatory Commission (NRC) transmitted a Request for Additional Information (RAI) regarding the License Renewal Application for the Palisades Nuclear Plant. This letter responds to that request.

Enclosure 1 provides the text of, and the NMC response to, the NRC request.

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 contains no new commitments or changes to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6, 2005.

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

A112

Enclosure (1)

CC Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC  
License Renewal Project Manager, Palisades, USNRC

**ENCLOSURE 1**

**NMC Response to NRC Request for Additional Information  
Dated September 8, 2005**

(2 pages)

Enclosure 1  
NMC Response to NRC Request for Additional Information  
dated September 8, 2005

**RAI 3.0-1**

The Nuclear Regulatory Commission (NRC) staff reviewed the applicant's aging management programs described in Appendix A of the Palisades license renewal application. This review was to assure that the aging management activities were consistent with the staff's guidance described in NUREG-1800, Section A.2, "Quality Assurance for Aging Management Programs (Branch Technical Position IQMB-1)," regarding quality assurance attributes of aging management programs.

Based on the staff's evaluation, the descriptions and applicability of the plant-specific aging management programs and their associated quality attributes provided in Appendix B1.2 of the LRA are consistent with the staff's position regarding quality assurance for aging management. However, the applicant has not sufficiently described the use of the quality assurance program and its associated attributes (corrective action, confirmation process, and administrative controls) in the discussions provided for aging management program described in Appendix A of the license renewal application.

The staff requests that the applicant supplement the descriptions in Appendix A to include a description of the quality assurance program attributes, including references to pertinent implementing guidance as necessary, which are credited for the programs described in Appendix B1.2 of the LRA. The descriptions in Appendix A should provide sufficient information for the staff to determine if the quality attributes for the Appendix A aging management programs are consistent with the review acceptance criteria contained in NUREG-1800, Section A.2, "Quality Assurance for Aging Management Programs (Branch Technical Position IQMB-1)."

**NMC Response to NRC RAI 3.0-1**

A new Section A1.1, to read as follows, is hereby added to LRA Appendix A for incorporation into the FSAR in conjunction with the summary descriptions of the Aging Management Programs:

**A1.1 Generic Quality Assurance Requirements for Aging Management Programs**

The Palisades Quality Assurance Program is described in the NMC Quality Assurance Topical Report, NMC-1. This NRC-approved program implements the requirements of 10 CFR 50, Appendix B, and includes the aging management program elements of corrective action, confirmation process and administrative controls.

The Palisades Quality Assurance Program implementation procedures will apply the elements of corrective action, confirmation process, and administrative controls to both safety related and non-safety related systems, structures, and components that are subject to aging management review for license renewal.

Generically, these three elements will be applicable to Aging Management Programs under the renewed operating license, as follows:

Enclosure 1  
NMC Response to NRC Request for Additional Information  
dated September 8, 2005

**Corrective Actions:**

Corrective actions are implemented in accordance with the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", and the NMC Quality Assurance Topical Report, NMC-1. NMC implements a corrective action program to promptly identify, control, document, classify, and correct conditions adverse to quality. In addition, for significant conditions adverse to quality, the program provides for cause evaluation and corrective actions to prevent recurrence. Significant conditions adverse to quality and significant adverse trends are documented and reported to responsible management.

**Confirmation Process:**

The confirmation process is part of the corrective action program, which is implemented in accordance with the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", and the NMC Quality Assurance Topical Report, NMC-1. The corrective action program includes provisions to ensure that corrective actions for significant conditions adverse to quality are completed as intended and are not inadvertently nullified by subsequent actions. Results of evaluations of conditions adverse to quality are analyzed to identify trends.

**Administrative Controls:**

Plant programs are implemented through a variety of procedures and other documents. These implementing documents are subject to administrative controls, including a formal review and approval process, in accordance with the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", and the NMC Quality Assurance Topical Report, NMC-1. Administrative procedures provide guidance on procedures and other forms of administrative control documents. Uniform guidelines and requirements are provided for preparing, revising, reviewing and approving procedures. Usage and adherence requirements are also defined for plant procedures.

As a separate matter, LRA Section B1.2, on pages B-3 and B-4, currently provides the description of the Quality Assurance Program as it will be applied to Aging Management Programs. This description references the Consumers Energy Quality Program Description for Nuclear Power Plants (Part 2) - Palisades Nuclear Plant as the NRC-approved topical report. On March 24, 2005, after the LRA was finalized for submittal, the NRC approved a new NMC Quality Assurance Topical Report to be applied at all NMC plants. Therefore, the NMC Quality Assurance Topical Report, NMC-1, has superseded the previous Consumers Energy topical report as the top-level policy document that establishes the manner in which quality is to be achieved at Palisades. Accordingly, all references to the Consumers Energy Quality Program Description (Part 2) - Palisades Nuclear Plant, contained in LRA Section B1.2, are hereby changed to NMC Quality Assurance Topical Report, NMC-1.