

October 11, 2005

LICENSEE: Nuclear Management Company, LLC

FACILITY: Palisades Nuclear Plant

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON  
SEPTEMBER 14, 2005, BETWEEN THE U.S. NUCLEAR REGULATORY  
COMMISSION (NRC) AND NUCLEAR MANAGEMENT COMPANY, LLC (NMC)  
CONCERNING THE APPLICANT'S RESPONSE TO REQUESTS FOR  
ADDITIONAL INFORMATION PERTAINING TO THE PALISADES NUCLEAR  
PLANT LICENSE RENEWAL APPLICATION (TAC NO. MC6433)

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Nuclear Management Company, LLC (NMC) held a telephone conference call on September 14, 2005, to discuss and clarify the applicant's response to requests for additional information concerning the Palisades Nuclear Plant license renewal application. The conference call was useful in clarifying the responses.

Enclosure 1 provides a listing of the meeting participants. Enclosure 2 contains a listing of the questions discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

*/RA/*

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

Enclosures: As stated

cc w/encls: See next page

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Palisades Nuclear Plant

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Palisades Nuclear Plant

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**LIST OF PARTICIPANTS FOR TELEPHONE CONFERENCE CALL  
TO DISCUSS THE PALISADES NUCLEAR PLANT  
LICENSE RENEWAL APPLICATION  
HELD ON SEPTEMBER 14, 2005**

**Participants**

Michael Morgan  
Richard McNally  
Robert Vincent  
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**Affiliations**

U.S. Nuclear Regulatory Commission (NRC)  
NRC  
Nuclear Management Company, LLC (NMC)  
NMC  
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**REQUESTS FOR ADDITIONAL INFORMATION (RAI)  
PALISADES NUCLEAR PLANT  
LICENSE RENEWAL APPLICATION**

**SEPTEMBER 14, 2005**

The U.S. Nuclear Regulatory Commission staff (the staff) and representatives of Nuclear Management Company, LLC (NMC) held a telephone conference call on September 14, 2005, to discuss and clarify the applicant's requests for additional information (RAI) concerning the Palisades Nuclear Plant license renewal application (LRA). The following questions were discussed during the telephone conference call.

**RAI B2.1.20-1(b) RAI B2.1.20-1(c) & RAI B2.1.20-2(b)**

The applicant responded that NMC has determined that the elastomers listed in the HVAC system and the Service Water System (SWS) are not long-lived components that require aging management and these items are to be deleted. Although these passive components do not require an Aging Management Program (AMP) if they are not long-lived components, the 10 CFR Part 54.21 rule requires an IPA for passive components unless they are subject to replacement based on a qualified life or specified time period. Therefore, the applicant must either: (1) clarify that these components are not in scope because they will be replaced based on a qualified life or specified time period, or (2) clarify that these passive components are considered in scope because they are long-lived and will be periodically inspected by an AMP such as the System Monitoring Program (SMP) or Preventive Maintenance Program (PMP). The program that manages the elastomers should include appropriate criteria for inspecting the elastomers.

**Discussion:** The applicant indicated that the question is clear. These requests will become open RAIs and will be deferred until another set of responses is received from the applicant.

**RAI B2.1.20-2(a)**

The applicant responded that NMC will adopt recommendations from applicable codes, industry standards, and/or manufacturer's recommendations. The applicant is requested to either (1) identify specific codes and standards or manufacturer's recommendations that will be applied to the SMP, or (2) as a condition of the license, clarify that this program will be updated at a later date and submitted to the NRC for review prior to the period of extended operation.

**Discussion:** The applicant indicated that the question is clear. The original response to this RAI will be considered adequate; however, the RAI will be reworded for clarification of the issue.

**RAI B2.1.20-2(d) & RAI B2.1.20-1(e)**

The applicant responded that, except for Class 1 borated water systems, NMC will not remove insulation because the condition of the insulation provides a good indirect indicator of the conditions beneath. The applicant is requested to consider industry guidance on corrosion under insulation (CUI) and clarify if removal of insulation at selected locations or imaging techniques may be prudent. For example, API-570 identifies common locations susceptible to CUI including the extent of visual external and CUI inspections at suspect locations.

Enclosure 2

**Discussion:** The applicant indicated that the question is clear. These requests will become open RAIs and will be deferred until another set of responses is received from the applicant.

**RAI B2.1.20-1(a)**

The applicant was requested to clarify if the entire exposed surface of the above ground steel tanks are included within scope of the System Monitoring Program (SMP). By letter dated July 25, 2005, the applicant clarified that the SMP is designed to cover the entire accessible exposed surfaces of above ground steel tanks down to its surface contact with soil or concrete. The applicant added that the program will not rely on sampling locations when completing inspections and the entire accessible exposed surface is that which can be accessed by an individual taking advantage of installed plant walkways, ladders and platforms. The applicant's response is not entirely acceptable because the staff is concerned that the entire exposed surface of the above ground steel tanks may not be accessible for inspection from existing installed plant walkways, ladders and platforms. The applicant is requested to clarify if all exposed surfaces of tanks are accessible for inspection from existing installed plant walkways, ladders and platforms or to clarify if temporary ladders and platforms are to be installed to support inspections .

**Discussion:** The applicant indicated that the question is clear. The original response to this RAI will be considered adequate; however, the RAI will be reworded for clarification of the issue.

**RAI B2.1.20-3**

NUREG-1800 Section A.1.2.3.6 Item 4 states that qualitative inspections should be performed by the same predetermined criteria as quantitative inspections by personnel in accordance with ASME code and through approved site specific programs. In RAI B.2.1.20-3, the applicant was requested to identify the inspection criteria such as ASME Code VT-1 examination or other industry standards and identify the qualifications of personnel performing the inspections. By letter dated July 25, 2005, the applicant responded that specific inspection criteria and individual inspector qualifications for the SMP will be determined as part of the implementation phase of the license renewal project. NMC will begin working on implementation later in 2005 and plans to complete draft AMPs and their associated implementing procedures in 2006. The staff is concerned that, for an existing program, such information should be available now for review. The applicant is requested to either (1) identify the inspection criteria and qualifications of inspectors that will be applied to the SMP, or (2) as a condition of the license (or commitment), clarify that this program will be updated at a later date and submitted to NRC for review prior to the period of extended operation.

**Discussion:** The applicant indicated that the question is clear. These requests will become open RAIs and will be deferred until another set of responses is received from the applicant.