



January 6, 2006

10 CFR 50.55a

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

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

Clarification to Request for Additional Information Response on Request for Relief from ASME Section XI Code Requirements for Repair of Pressurizer Nozzle Penetrations

By letter dated July 22, 2005, Nuclear Management Company, LLC (NMC) requested Nuclear Regulatory Commission (NRC) approval, pursuant to 10 CFR 50.55a(a)(3)(i), for the use of an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, related to the repair of pressurizer heater sleeve penetrations at the Palisades Nuclear Plant (PNP). The specific request was to use Code Case N-638, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine GTAW Temper Bead Technique," with three exceptions.

Subsequent to NMC submitting the request, Code Case N-638-1, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine GTAW Temper Bead Technique," was conditionally approved per Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability – ASME Section XI Division 1," Revision 14, dated August 2005.

By letter dated October 28, 2005, the NRC issued a request for additional information (RAI) on the subject relief request. NMC responded to the RAI by letter dated November 22, 2005. Subsequent to the RAI response, the NRC staff requested clarification on what ASME Code Case NMC intended to use.

NMC is requesting to use Code Case N-638-1, with one exception. The exception still needed is Exception #2, as described in letter dated July 22, 2005, on the examination volume.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

A handwritten signature in black ink, appearing to read 'Paul A. Harden', with a long horizontal flourish extending to the right.

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

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
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