

April 20, 2006

Mr. Paul A. Harden
Site Vice President
Nuclear Management Company, LLC
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES PLANT — COMMITMENT CHANGE: STEAM GENERATOR
TUBESHEET INSPECTION DEPTH

Dear Mr. Harden:

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-01, "Requirements For Steam Generator Tube Inspections," on August 30, 2004. The purpose of GL 2004-01 was to obtain information that would enable NRC staff to determine whether licensee steam generator tube inspection programs comply with the existing tube inspection requirements in plant technical specifications and Appendix B to Title 10 of the *Code of Federal Regulations*, Part 50.

Nuclear Management Company's (NMC's) letter of October 29, 2004, as supplemented August 22, 2005, responded to GL 2004-01 for Palisades Nuclear Plant. Based on a review of the information provided, we concluded NMC's response to GL 2004-01 was acceptable, as documented in my letter of November 22, 2005.

Your letter of March 20, 2006, modified your commitment for inspecting the tubesheet region. You said Palisades would now use the methodology in WCAP-16208-P, "NDE Inspection Length for CE [Combustion Engineering] Steam Generator Tubesheet Region Explosive Expansions," to determine the extent of inspection in the tubesheet region instead of inspecting the entire portion of the tube within the tubesheet region for 3 percent of the tubes on the hot-leg side of the steam generator. The methodology in WCAP-16208-P would be amended, as necessary, to address the hot-leg temperature at Palisades and the load when the test specimens first began to slip. You also committed to submit a license amendment request to include WCAP-16208-P in the surveillance program requirements of the Steam Generator Program by May 31, 2006.

We have reviewed your commitment changes, and the safety assessment for your approach for inspecting in the tubesheet region. Based on this review, we conclude that your changes are acceptable since the license amendment will modify the inspection requirements in the tubesheet region, and the time for taking this corrective action is commensurate with the safety

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significance of the issue. We note that your proposed approach to addressing the issues raised in GL 2004-01 is similar to that taken by other plants that had not been performing inspections in the tubesheet region consistent with the NRC staff's position in GL 2004-01.

Sincerely,

/RA/

L. Mark Padovan, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

cc: See next page

P. Harden

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Sincerely,

/RA/

L. Mark Padovan, Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

cc: See next page

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Palisades Plant

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