



March 12, 2007

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

Revision to Relief Request 4-5 from 4<sup>th</sup> Interval ISI Plan Update (TAC No. 2408)

By letter dated June 12, 2006, pursuant to 10 CFR 50.55a, Nuclear Management Company, LLC (NMC) submitted the 4<sup>th</sup> Interval Inservice Inspection (ISI) plan for the Palisades Nuclear Plant (PNP). The relief requests included in the plan were submitted for Nuclear Regulatory Commission (NRC) review and approval.

NMC has revised relief request 4-5. This revision replaces relief request 4-5 that was submitted by letter dated June 12, 2006. Enclosure 1 provides the revised relief request 4-5 for review.

Summary of Commitments

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

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Nuclear Management Company, LLC

Enclosure (1)

CC Administrator, Region III, USNRC  
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## ENCLOSURE 1

RELIEF REQUEST NUMBER - RR 4-5

### COMPONENT IDENTIFICATION

Code Class	1
Code Reference	IWB-2500 Table IWB-2500-1
Examination Category	B-P
Item Number	B15.10
Component Description	Alternative Testing for Components Under the Reactor Vessel*

\* The PNP reactor vessel has no bottom penetrations.

### CODE REQUIREMENT

The applicable code edition and addenda is the ASME B&PV Code, Section XI, 2001 Edition with addenda through 2003.

The applicable code requirement is described in Table IWB-2500-1, "Examination Category B-P," which requires a system leakage test be conducted prior to plant startup following a reactor refueling outage in accordance with IWB-5220.

### BASIS FOR RELIEF

NMC is requesting relief from ASME Section XI, IWB-5220, which requires a system leakage test prior to plant startup following a reactor refueling outage, because the area under the reactor vessel is extremely hazardous when the plant is at hot shutdown conditions for system leakage testing. Radiation levels are expected to be 2.5 rem/hr (on contact), which is the maximum measured during cold shutdown. The radiation levels in the reactor cavity are expected to be 1.5 to 2 rem per hour. Assuming two persons in this area at one-half hour per person, a total dose of 1.5 to 2 rem of dose would be received.

In addition to radiation concerns, access to the area under the reactor vessel poses various industrial hazards. Of primary concern is confined space and heat stress. Ambient air temperatures with the primary coolant system at full pressure and temperature are expected to be approximately 300 degrees. Access under these conditions would require significant ventilation for cooling. The access tube to this area is only 30 inches in diameter. This size limits the amount of ventilation possible while allowing personnel access.

## PROPOSED ALTERNATE EXAMINATION

NMC requests to use ASME Section XI, IWA-5244, "Buried Components," as a proposed alternative to determine leakage from piping and components in the area under the reactor vessel at PNP. This requirement will be satisfied by performance of Technical Specification Surveillance Procedure DWO-1, "Operator's Daily/Weekly Items Modes 1, 2, 3, and 4," which completes the primary coolant system leakage calculation. Performance of this procedure ensures that the leakage requirements of Technical Specification SR 3.4.13.1 are met. Additionally, if the unidentified leakage determined by the performance of DWO-1 is greater than 0.15 gpm from a three hour leakrate at stable plant conditions, Off Normal Procedure ONP-23.1, "Primary Coolant Leak," is required to be entered to determine the source of the leakage and to take appropriate steps.

Additionally, NMC performs a remote visual examination of the area under the reactor vessel once per refueling outage at PNP. This examination documents active leakage or evidence of leakage which may have occurred during the previous power cycle.

The proposed alternative provides reasonable assurance of structural integrity by providing assurance that leakage or evidence of leakage is identified. Therefore, pursuant to 10CFR50.55a(a)(3)(ii), relief is requested on the basis that the specified requirements above would result in hardship and unusual difficulty without a compensating increase in the level of quality and safety.

## IMPLEMENTATION SCHEDULE

The proposed alternative is requested for the 4th ten-year interval of the Inservice Inspection Program for Palisades Nuclear Plant, which will conclude on or before December 13, 2015.

## REFERENCE

By letter dated June 28, 1996, the NRC Staff previously authorized this relief request for PNP for the 3rd ten-year inspection interval (Previously PR-02).