



Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043

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August 16, 2007

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

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

Response to Request for Information Regarding Generic Letter 2003-01, "Control Room Habitability" (TAC No. MB9833)

Dear Sir or Madam:

By letter dated September 25, 2006, Nuclear Management Company, LLC, the former licensee for the Palisades Nuclear Plant (PNP), requested Nuclear Regulatory Commission (NRC) review and approval of a license amendment request (LAR) for PNP. The proposed license amendment would modify the PNP licensing basis to adopt the alternative source term (AST) methodology. Commitment number 2.b was made to replace the control room normal air intake and purge isolation dampers. Commitment number 3 was made to conduct post-modification testing, including tracer gas testing, following the implementation of the three modifications described in commitment number 2.

By letter dated June 28, 2007, the NRC provided a status on the PNP response to Generic Letter 2003-01, "Control Room Habitability." In that response, the NRC requested that Entergy Nuclear Operations, Inc. submit the results of post-modification control room envelope (CRE) inleakage testing committed to in the AST LAR submittal. PNP has replaced the control room normal air intake and purge isolation dampers. Tracer gas testing was completed at PNP after the modification. Enclosure 1 contains the results of the CRE inleakage testing completed after the modification. The remaining two modifications have not been completed. However, they do not affect the CRE. Therefore, no additional inleakage testing is required as part of the post-modification testing.

Summary of Commitments

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

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I declare under penalty of perjury that the foregoing is true and correct. Executed on August 16, 2007.



Christopher J. Schwarz  
Site Vice President  
Palisades Nuclear Plant

Enclosure (1)

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

**ENCLOSURE 1**  
**RESULTS OF CONTROL ROOM ENVELOPE INLEAKAGE TESTING**  
**FOLLOWING MODIFICATIONS AT PALISADES NUCLEAR PLANT**

Control Room Envelope (CRE) leakage testing was performed June 26, 2007, through June 28, 2007, following modifications to control room normal air intake and purge isolation dampers at Palisades Nuclear Plant. NUCON International, Inc. (NUCON) was contracted to perform the test. The test was performed using Palisades Special Test Procedure T-336, "Control Room Envelope Integrated Unfiltered Inleakage Test," revision 1. The amount of unfiltered air inleakage into the pressurized CRE was determined using NUCON Procedure 12-366, "Envelope Leakage Testing and Characterization using the Constant Injection Method," revision 2. The test procedures were based on American Society for Testing and Materials ASTM E741, "Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," to ensure compliance with the requirements of Generic Letter 2003-01, "Control Room Habitability." Inleakage for the control room emergency heating, ventilation, and air conditioning Trains "A" and "B" alone, and in dual operation mode, was measured using the constant injection method. The results are provided below. Units are in standard cubic feet per minute (scfm).

Test Configuration	Unfiltered Inleakage <sup>(1)</sup> (scfm)	Uncertainty <sup>(2)</sup> (scfm)
Train "A" Emergency mode Damper 2 Failed Open	10	±18
Train "B" Emergency mode Damper 9 Failed Open	16	±13
Dual Train Emergency mode Damper 9 Failed Open	15	±8

- (1) Air change rate is estimated based on a Pitot tube traverse of the pressurization airflow.
- (2) Per Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Section 1.4, uncertainty is not required to be reported for measured inleakage values less than 100 cfm but is included for information only.

Entergy Nuclear Operations, Inc. recognizes that the inleakage test results above indicate an essentially leak tight control room envelope. The limiting results for this test can be incorporated into the design basis analysis following the completion of the remaining post-modification testing.