

January 31, 2008

Mr. Michael Balduzzi
Sr. Vice President, Regional Operations NE
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: PALISADES NUCLEAR PLANT - ISSUANCE OF AMENDMENT RE: REALISTIC
LARGE BREAK LOSS-OF-COOLANT ACCIDENT (TAC NO. MD3492)

Dear Mr. Balduzzi:

The Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 229 to Facility Operating License No. DPR-20 for the Palisades Nuclear Plant. The amendment consists of changes to the technical specifications (TSs) in response to your application dated November 6, 2006, supplemented by letters dated August 10, 2007, and December 20, 2007 (Agencywide Documents and Management System (ADAMS) Accession Nos. ML063180359, ML072260542, and ML080080470 respectively).

The amendment would revise Appendix A, TS, Core Operating Limits Report analytical methods referenced in TS 5.6.5.b to add EMF-2103 (P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors,".

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

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

Docket No. 50-255

Enclosures:

1. Amendment No. 229 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

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 Mahesh L. Chawla, Project Manager
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* Memo dated 1/16/08 (ADAMS Accession No.: ML080170062)

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ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 229
License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Nuclear Operations, Inc. (the licensee), dated November 6, 2006, supplemented by letters dated August 10, 2007, and December 20, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 229, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Entergy Nuclear Operations, Inc., shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA JCushing for/

Patrick D. Milano, Acting Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: January 31, 2008

ATTACHMENT TO LICENSE AMENDMENT NO. 229

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following page of the Facility Operating License No. DPR-20 with the attached revised page. The changed area is identified by a marginal line.

REMOVE

INSERT

Page 3

Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

5.0-27

5.0-27

- C. This license shall be deemed to contain and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Entergy Nuclear Operations, Inc., authorized to operate the facility at steady-state reactor core power levels not in excess of 2565.4 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.
 - (2) The Technical Specifications contained in Appendix A, as revised through Amendment No. 229, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Entergy Nuclear Operations, Inc., shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - (3) Entergy Nuclear Operations, Inc., shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SERs dated 09/01/78, 03/19/80, 02/10/81, 05/26/83, 07/12/85, 01/29/86, 12/03/87, and 05/19/89 and subject to the following provisions:
 - a. Entergy Nuclear Operations, Inc., may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
 - b. Entergy Nuclear Operations, Inc., may alter specific features of the approved fire protection program provided:
 - Such changes do not result in failure to complete the fire protection program as approved by the Commission. Entergy Nuclear Operations, Inc., shall maintain in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program and shall make such records available to the Commission Inspectors upon request. All changes to the approved program shall be reported along with the FSAR revision as required by 10 CFR 50.71 (e); and
 - Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.
 - (4) Upon implementation of Amendment No.189, the schedule for performance of new or revised surveillance requirements (SRs) shall be as follows:
 - For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 229 TO FACILITY OPERATING LICENSE NO. DPR-20
ENTERGY NUCLEAR OPERATIONS, INC.

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter to the Nuclear Regulatory Commission (NRC, the Commission) dated November 6, 2006, as supplemented by letters dated August 10, 2007, and December 20, 2007 (Agencywide Documents and Access Management System (ADAMS) Accession Nos. ML063180359, ML072260542, and ML080080470, respectively), Entergy Nuclear Operations, Inc. (the licensee), requested changes to the technical specifications (TSs) for the Palisades Nuclear Plant (PNP). The proposed changes would revise Appendix A, TS, Core Operating Limits Report (COLR) analytical methods referenced in TS 5.6.5.b to add EMF-2103 (P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." The licensee's submittal contained the technical report BAW-2501 (P) Revision 1 Reference (Ref. 3) describing PNP's Large Break Loss-of-Coolant Accident (LBLOCA) analyses performed using the EMF-2103 best estimate (BE) LBLOCA methodology. The supplements to the application provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the Federal Register on December 19, 2006 (71 FR 75995).

2.0 REGULATORY EVALUATION

Section 50.46 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Acceptance criteria for emergency core cooling systems for light-water nuclear power reactors," specifies requirements for the acceptability of the emergency core cooling system. Paragraphs 50.46(a)(1)(i) and 50.46(a)(1)(ii) of 10 CFR specify alternative approaches to show compliance with the acceptance criteria of 10 CFR 50.46(b). Part 50 of 10 CFR, Appendix K, requires it to be assumed in the emergency core cooling system evaluation models that the reactor has been operating continuously at a power level at least 1.02 times the licensed power level (to allow for instrumentation error), with the maximum peaking factor allowed by the technical specifications. Appendix K permits a lower assumed power level (but not less than the licensed power level) to be used provided the proposed alternative value has been demonstrated to account for uncertainties due to power level instrumentation error. A licensee's compliance with the above criteria demonstrates the acceptability, following a LOCA, of (1) the peak calculated cladding temperature, (2) the maximum cladding oxidation, (3) the maximum hydrogen generation, and (4) the capability to maintain a coolable geometry, and (5) the capability to maintain long-term core cooling.

As explained below, the NRC staff used these acceptance criteria in assessing the acceptability of the AREVA realistic LBLOCA (RLBLOCA) methodology for PNP. In its analysis of the licensee's request, the NRC staff also reviewed the limitations and conditions stated in its previous safety evaluation dated April 19, 2003, (Ref. 2) in which the NRC staff approved the general AREVA RLBLOCA methodology and the range of parameters described in the AREVA RLBLOCA methodology topical report.

3.0 TECHNICAL EVALUATION

The licensee's BE LBLOCA analyses were performed to demonstrate that the ECCS design would provide sufficient ECCS flow to transfer the heat from the reactor core following a LBLOCA and at a rate such that (1) fuel and clad damage that could interfere with continued effective core cooling would be prevented, and (2) the clad metal-water reaction would be limited to less than the amounts that would compromise cladding ductility and result in excessive hydrogen generation.

The NRC staff reviewed the analyses to assure that the safety functions could be accomplished, with appropriate consideration of single-failure, containment capabilities and loss of onsite or offsite electric power (i.e., assuming offsite electric power is not available, with onsite electric power available; or assuming onsite electric power is not available, with offsite electric power available).

The NRC staff reviewed the licensee's demonstration evaluations of the ECCS performance analysis, done in accordance with the AREVA BE LBLOCA methodology, for PNP operating at its currently licensed core power of 2565.4 MWt. These specific analyses were performed to demonstrate the suitability of the AREVA methodology for application to PNP. Accordingly, it should be noted that this SE and the associated amendment apply only to use of the AREVA RLBLOCA methodology at PNP at the plant's currently licensed power; the analysis herein does not address any future PNP power uprate. The staff also determined the specific analyses discussed herein to be acceptable and specifically applicable to PNP with respect to the fuel(s) identified in the Table 1 that follows. The BE LBLOCA analyses for PNP were conducted assuming that the plant uses cores containing M5 clad uranium oxide fuel assemblies.

In its November 6, 2006, submittal (Ref. 1), the licensee [NMC, Nuclear Management Company, LLC, licensee at the time of the submittal] stated, "NMC and AREVA NP have ongoing processes that assure the ranges and values of input parameters for the Palisades RLBLOCA analysis bound those of the as-operated plant values." As discussed below, the staff finds that this statement, along with the NRC staff's prior generic approval of the AREVA RLBLOCA analysis methodology, provides assurance that the AREVA RLBLOCA analysis methodology and its LBLOCA analyses apply to PNP operated at its current licensed power level.

In its submittal, the licensee provided the results for the PNP RLBLOCA analyses (Ref. 3), operating at the rated power of 2565.4 MWt (performed in accordance with the AREVA RLBLOCA methodology). The licensee's results for the calculated peak cladding temperatures (PCTs), the maximum cladding oxidations (local), and the maximum core-wide cladding oxidations for PNP are provided in the following table along with the acceptance criteria of 10 CFR 50.46(b).

LBLOCA ANALYSIS RESULTS – PNP

Parameter	PNP RLBLOCA Results	10 CFR 50.46 Limits
Limiting Break Size/Location	DEG/PD*	N/A
Cladding Material	Zr-4	(Cylindrical) Zircaloy or Zirlo
Peak Clad Temperature	1751 °F	2200 °F (10 CFR 50.46(b)(1))
Maximum Local Oxidation	0.87%	17.0% (10 CFR 50.46(b)(2))
Maximum Total Core-Wide Oxidation (All Fuel)	< 0.02%	1.0% (10 CFR 50.46(b)(3))

*DEG/PD is a double ended guillotine break at the pump discharge.

In conjunction with the review of the licensing action request, the NRC staff noted that the licensee’s LBLOCA analyses for PNP ranged reactor core power. The NRC staff was concerned that the licensee’s approach was not consistent with 10 CFR Part 50, Appendix K, Section I.A in two respects: (1) the power was ranged to values lower than 100 percent of core power, and (2) the ranging of power incorrectly mixed two different statistical distributions, which adversely impacts the assumed power and the measurement uncertainty distribution associated with the licensed power. However, in its response, dated December 20, 2007 (Ref. 5), to a NRC question, the licensee noted that the peak cladding temperature case (and therefore the licensing basis case) identified in the analyses was calculated assuming a higher reactor power than required by the nominal peaking factor range approved in the NRC SER (Ref. 2). The NRC staff finds the use of this assumption to be conservative, and therefore concludes that the analysis is acceptable and in accordance with Appendix K.

The analyses also ranged the availability of offsite power, which is inconsistent with 10 CFR Part 50, Appendix A, General Design Criteria (GDC) 35. Pursuant to GDC 35, loss of on-site power and loss of off-site power should be analyzed independently. However, the NRC staff noted that PNP is not a GDC plant and reviewed the analysis accordingly. The NRC staff noted that, historically, the Palisades plant LBLOCA analyses have been performed using models conforming with the provisions of 10 CFR Part 50, Appendix K. Appendix K methodologies are more conservative than best estimate LOCA methodologies and assume loss of offsite power. Therefore, previous Palisades LOCA analyses using Appendix K methodologies provide qualitative support for the adequacy of the presently proposed BE LBLOCA analyses using the AREVA RLBLOCA methodology.

In another component of its review, the NRC staff noted that in its analyses the licensee did not address the concern that the fuel cladding may have pre-existing oxidation that must be considered in its LOCA analyses. In its November 6, 2006 submittal (Ref. 1), the licensee stated: “The AREVA NP RLBLOCA methodology explicitly analyzes only fresh fuel assemblies. . . . Previous analyses showed that once- and twice-burnt fuel is not limiting up to peak rod average exposures of 62,000 Mwd/MTU.”

As such, NRC staff considers the licensee's estimate of oxidation resulting from the postulated LBLOCA alone to be very low for Zr-4 cladding (0.87 percent, without considering pre-LOCA oxidation and without considering oxidation on both inside and outside surfaces). Another factor that may contribute to the licensee's low calculated oxidation level is the low calculated LBLOCA peak cladding temperature (PCT) 1751 °F. The low PCT for LBLOCA is, in turn, most likely the result of the accumulator pressure assumed in the analyses, the LBLOCA analysis methodology's use of the Forslund-Rohsenow heat transfer model, and the treatment of radiation heat transfer.

Nevertheless, the NRC staff considers that even if the calculated PCT were greater (by less than 50 °F) and local oxidation were reasonably greater, the total expected oxidation, including accounting for all factors discussed above, would still be less than the 17 percent limit specified in 10 CFR 50.46(b)(2).

The need to analyze core-wide oxidation relates to the amount of hydrogen generated during a LOCA. However, because hydrogen that may have been generated pre-LOCA (during normal operation) will be removed from the reactor coolant system throughout the operating cycle, the NRC staff noted that pre-existing oxidation does not contribute to the amount of hydrogen generated post-LOCA and, therefore, it does not need to be addressed further when determining whether the calculated total core-wide oxidation meets the 1.0 percent criterion of 10 CFR 50.46(b)(3).

The NRC staff review also focused on radiation heat transfer because PNP has cruciform control "rods" that are located outside the fuel assembly. The hottest fuel rods in this design radiate only to other hot fuel rods. In contrast, S-RELAP, the thermal hydraulic code used by the licensee, has been only shown to apply to fuel assemblies with control rods, water-filled hollow rods, and structural components that are internal to the assemblies, and can also act as heat sinks for the hottest rod(s). Therefore, the S-RELAP treatment of core radiative heat transfer is non-conservative for the PNP core design. However, based on the significant margins to limits for PCT, oxidation and hydrogen shown in the table above, the NRC staff finds that the limits specified in 10 CFR 50.46(b) are met.

As discussed previously, the licensee had AREVA conduct BE LBLOCA analyses for PNP operating at the current licensed power level of 2565.4 MWt using an NRC approved AREVA BE LBLOCA analysis methodology. Based on its independent review, the NRC staff concludes that the results of these analyses demonstrate that the acceptance criteria of 10 CFR 50.46(b)(1) through (b)(3) would not be exceeded during a LBLOCA for licensed power levels of up to 2565.4 MWt. Meeting these criteria provides reasonable assurance that at the current licensed power level the PNP core will be amenable to cooling as required by 10 CFR 50.46(b)(4). The capability of PNP 1 & 2 to satisfy the long term cooling requirements of 10 CFR 50.46(b)(5) is unaffected by this amendment.

3.1 Palisades Technical Specifications Change

In support of its November 6, 2006, License Amendment Request (LAR) (Ref. 1) the licensee proposed to make amendments to the PNP "Core Operating Limits Report" (COLR) for the plant to reflect use of a new LBLOCA analysis methodology to perform LBLOCA analyses in support of PNP operation. The licensee also provided a proposed page TS 5.6.5 COLR, amended to reflect the implementation of EMF-2103 (P)(A) as the licensing basis LBLOCA methodology for

the PNP plant. The NRC staff reviewed the TS provision, assessed it for consistency against NUREG-1432, Revision 3 (Ref. 4), and found its content acceptable and compatible with a proposed COLR.

Proposed TS change:

The following reference is added:

20. EMF-2103 (P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." (LCOs 3.1.6, 3.2.1, & 3.2.2)

This methodology was found to apply to all conventional Westinghouse, Combustion Engineering, and Babcock and Wilcox Pressurized Water Reactor (PWR) designs in the NRC generic SE of the EMF-2103 (P)(A) Revision 0 methodology. Therefore, the NRC staff concludes that the realistic LBLOCA methodology described in EMF-2103 (P)(A) Revision 0 is acceptable for application to PNP, which is a PWR of Combustion Engineering design, and for inclusion in TS for PNP. The above listed TS Ref. 20, was presented in the licensee's submittal as a TS addition. This reference does not include the EMF-2103 revision number; nor does it include the date of approval for the methodology. The licensee will list the topical report, including the latest revision number (used at Palisades), and date of approval in the COLR for the PNP plant consistent with guidance provided in NUREG-1431.

The NRC staff finds that the EMF-2103 (P)(A) Revision 0 methodology is applicable to PNP, and that the limitations and conditions of the NRC's SE approving the EMF-2103 (P)(A) Revision 0 methodology were satisfied, for the present Palisades operating power. The NRC staff concludes that the proposed addition of EMF-2103 (P)(A) Revision 0 to Palisades TS is acceptable.

3.2 Summary

Based on its review as discussed above, the NRC staff concluded that the AREVA BE LBLOCA analyses methodology, as described in EMF-2103 (P)(A) Revision 0 (Ref. 2), is acceptable for use by PNP in demonstrating compliance with the requirements of 10 CFR 50.46(b). The NRC staff's conclusion is based on having verified that the PNP's design is among the designs for which AREVA BE LBLOCA application was approved.

The NRC staff's review of the acceptability of the AREVA BE LBLOCA methodology for PNP focused on assuring that the licensee and its vendor have processes to assure that specific input parameters or bounding values and ranges (where appropriate) are used to conduct the PNP LBLOCA analyses, that the analyses will be conducted within the conditions and limitations of the NRC approved AREVA BE LBLOCA methodology, and that the results will satisfy the requirements of 10 CFR 50.46(b) for Palisades operating at its present licensed power.

This SE documents the NRC staff review and acceptance of the AREVA BE LBLOCA analysis methodology for application to PNP, for inclusion in the PNP TS 6.2.C and COLR, and of the specific LBLOCA analyses discussed above that were performed with the AREVA BE LBLOCA methodology for PNP operated at powers up to its licensed power level of 2565.4 MWt.

As noted above, this SE and the associated approvals apply only to using the AREVA Realistic LBLOCA methodology at PNP at the present power; the analysis does not address any future PNP power uprate.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The Michigan State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (71 FR 75995). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. Letter from Paul A. Harden, Site Vice-President, Palisades Nuclear Plant, Nuclear Management Company, LLC, November 6, 2006 (ADAMS Accession No. ML061880026)
2. AREVA NP Document, EMF-2103 (P)(A) revision 0, Realistic Large break LOCA Methodology, Framatome ANP, Inc, April 9, 2003 ADAMS Accession No. (ML050910159/61(NP)) and ADAMS Accession No. (ML050910162/63(P))
3. BAW-2501 (P) Revision 1 - Palisades Nuclear Plant Realistic Large Break LOCA Summary Report, August 2006 (included in Reference 1).
4. NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 3, TS 5.6.5.
5. Letter from Christopher J. Schwartz, Palisades Nuclear Plant, to U.S. Nuclear Regulatory Commission, dated December 20, 2007 (ADAMS Accession No. ML080080470)

Principal Contributor: Frank Orr, NRR

Date: January 31, 2008

Palisades Plant

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