



Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
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May 5, 2008

10 CFR 50.90

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

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

License Amendment Request to Correct Renewed Facility Operating License

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc (ENO) requests Nuclear Regulatory Commission (NRC) review and approval of a proposed license amendment for the Palisades Nuclear Plant. ENO proposes to revise renewed facility operating license DPR-20 to correct an error generated when the renewed facility operating license was created and also remove several outdated license conditions pertaining to surveillance requirements.

Enclosure 1 provides a detailed description of the proposed change, background and technical analysis, No Significant Hazards Consideration Determination, and Environmental Review Consideration. Enclosure 2 provides the revised renewed facility operating license pages reflecting the proposed change. Enclosure 3 provides the annotated renewed facility operating license pages showing the changes proposed.

ENO requests approval of the proposed license amendment request by May 5, 2009, with the amendment being implemented within 90 days.

By letter dated May 5, 2008, ENO requested NRC review and approval of a license amendment to eliminate license condition 2.F to DPR-20. ENO will work with the NRC project manager, as necessary, to coordinate the changes to the operating license.

A copy of this request has been provided to the designated representative of the State of Michigan.

Summary of Commitments

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 5, 2008.



Christopher J. Schwarz  
Site Vice President  
Palisades Nuclear Plant

Enclosures (3)

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

# **ENCLOSURE 1**

## **DESCRIPTION OF REQUESTED CHANGES**

### **1.0 DESCRIPTION**

Entergy Nuclear Operations, Inc (ENO) requests to revise renewed facility operating license DPR-20 for the Palisades Nuclear Plant (PNP) to correct an error generated when the renewed operating license was created and also remove several outdated license conditions pertaining to surveillance requirements.

### **2.0 PROPOSED CHANGE**

ENO proposes to revise renewed facility operating license DPR-20 as follows:

- Remove the words “filed by Entergy Nuclear Palisades, LLC (ENP) and Entergy Nuclear Operations, Inc. (ENO)” in section A.1.
- Spell-out acronyms used in section 1.F.
- Delete license conditions 2.C.(4) and 2.C.(5), and delete Table 2.C.(5).

### **3.0 BACKGROUND**

Amendment 189 to Operating License No. DPR-20, dated November 30, 1999, converted Palisades Technical Specifications (TS) to the Standard Technical Specifications (STS) format. This conversion was based on NUREG-1432, “Standard Technical Specifications Combustion Engineering Plants,” revision 1. This amendment also added license condition 2.C.(4) to address performance of new or revised TS surveillance requirements (SRs) while implementing Amendment 189.

Amendment 206 to Operating License No. DPR-20, dated December 19, 2001, revised the Palisades Operating License. This amendment added license condition 2.C.(5) and Table 2.C.(5) to extend certain TS surveillance requirement intervals, on a one-time basis, to permit them to be performed during a refueling outage, but no later than April 30, 2003.

Amendment 224, dated April 11, 2007, issued the Palisades Renewed Facility Operating License No. DPR-20 to ENP and ENO. This amendment included license conditions 2.C.(4) and 2.C.(5), and Table 2.C.(5). This amendment also inadvertently created an error in section A.1 when describing the initiator of the request for the renewed operating license.

### **4.0 TECHNICAL ANALYSIS**

The wording of Renewed Operating License DPR-20 section A.1 is incorrect as written. This section states that ENO filed for the renewed facility operating license. The filing for the renewed facility operating license was actually completed by Consumers Energy and Nuclear Management Company, LLC. To

resolve this error, ENO proposes that the detail of who filed for the renewed facility operating license be removed from section A.1 and that a collateral proposed change be made to section 1.F to spell-out first-use acronyms ENP and ENO.

The provisions of renewed facility operating license DPR-20 condition 2.C.(4) are no longer required since over seven years have transpired since Amendment 189 was implemented and all affected SRs have been performed. Renewed facility operating license DPR-20 condition 2.C.(5) and Table 2.C.(5) are no longer required since the allowed extension expired on April 30, 2003.

In summary, the proposed changes serve to delete outdated provisions for several surveillance requirements as well as correcting an error that was inadvertently created during Amendment 224 to DPR-20. Therefore, these proposed changes will have no adverse impact on plant safety.

## **5.0 REGULATORY SAFETY ANALYSIS**

### **5.1 No Significant Hazards Consideration**

Entergy Nuclear Operations, Inc (ENO) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed license amendment deletes incorrect or outdated information from the renewed facility operating license. The proposed amendment does not involve operation of the required structures, systems or components (SSCs) in a manner or configuration different from those previously recognized or evaluated.

Modification of renewed facility operating license sections 1.A and 1.F and deletion of license conditions 2.C.(4), 2.C.(5), and Table 2.C.(5) is administrative and has no impact on plant operation or equipment.

Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed license amendment does not involve a physical alteration of any SSC or change the way any SSC is operated. The proposed license amendment does not involve operation of any required SSCs in a manner or configuration different from those previously recognized or evaluated.

Modification of renewed facility operating license sections 1.A and 1.F and deletion of license conditions 2.C.(4), 2.C.(5), and Table 2.C.(5) is administrative and has no impact on plant operation or equipment.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

Modification of renewed facility operating license sections 1.A and 1.F and deletion of license conditions 2.C.(4), 2.C.(5), and Table 2.C.(5) is administrative and has no impact on plant operation or equipment or on any margin of safety.

Therefore, the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the evaluation above, ENO concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

## 5.2 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. The proposed change does not require relief from other regulatory requirements and does not affect conformance with any General Design Criterion differently than described in the Final Safety Analysis Report.

In conclusion, based on the considerations described above, (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.

## **6.0 ENVIRONMENTAL CONSIDERATION**

ENO has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

## **7.0 REFERENCES**

1. Amendment 189 to Facility Operating License No. DPR-20, "Palisades Plant – Issuance of Amendment RE: Conversion of Current Technical Specifications to Improved Technical Specifications (TAC No. MA0805)," dated November 30, 1999 (ADAMS accession number ML993510317).
2. Amendment 206 to Facility Operating License No. DPR-20, "Palisades Plant – Issuance of Amendment to Extend Surveillance Requirement Intervals," dated December 19, 2001 (ADAMS accession number ML013540433).
3. Amendment 224 to Renewed Facility Operating License No. DPR-20, "Palisades Nuclear Plant – Issuance of Conforming Amendment RE: Direct Transfer of Renewed Facility Operating License to Entergy Nuclear Palisades and Entergy Nuclear Operations (TAC No. MD2954)," dated April 11, 2007 (ADAMS accession number ML071010308).

**ENCLOSURE 2**

**LICENSE AMENDMENT REQUEST TO CORRECT RENEWED FACILITY  
OPERATING LICENSE**

REVISED RENEWED FACILITY OPERATING LICENSE PAGES 1, 2, 4, and 5 (shown  
on facsimile license pages)

AND

RENEWED FACILITY OPERATING LICENSE PAGE CHANGE INSTRUCTIONS

5 Pages Follow

**ATTACHMENT TO LICENSE AMENDMENT NO.**

**RENEWED FACILITY OPERATING LICENSE NO. DPR-20**

**DOCKET NO. 50-255**

Remove the following pages of renewed facility operating license DPR-20 and replace with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

**REMOVE**

1(not numbered)  
2  
4  
5

**INSERT**

1 (not numbered)  
2  
4  
5



ENTERGY NUCLEAR PALISADES, LLC

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-255

PALISADES NUCLEAR PLANT

RENEWED FACILITY OPERATING LICENSE

Renewed License No. DPR-20

1. The Nuclear Regulatory Commission (NRC or the Commission) having previously made the findings set forth in Operating License No. DPR-20, dated February 21, 1991, has now found that:
  - A. The application for Renewed Operating License No. DPR-20 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, and all required notifications to other agencies or bodies have been duly made;
  - B. Construction of the Palisades Plant (the facility) has been completed in conformity with Provisional Construction Permit No. CPPR-25 and the application, as amended, the provisions of the Act, and the regulations of the Commission, and has been operating under facility operating license since February 21, 1991;
  - C. Actions have been identified and have been or will be taken with respect to:
    - (1) managing the effects of aging on the functionality of structures and components that have been identified to require review under 10 CFR 54.21(a)(1) during the period of extended operation, and (2) time-limited aging analyses that have been identified to require review under 10 CFR 54.21(c), such that there is reasonable assurance that the activities authorized by this renewed operating license will continue to be conducted in accordance with the current licensing basis, as defined in 10 CFR 54.3 for the facility, and that any changes made to the facility's current licensing basis in order to comply with 10 CFR 54.29(a) are in accordance with the Act and the Commission's regulations;

- D. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
  - E. There is reasonable assurance: (i) that the activities authorized by this renewed operating license 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 set forth in 10 CFR Chapter I;
  - F. Entergy Nuclear Palisades, LLC (ENP) is financially qualified and Entergy Nuclear Operations, Inc. (ENO) is financially and technically qualified to engage in the activities authorized by this renewed operating license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;
  - G. ENP and ENO have satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements" of the Commission's regulations;
  - H. The issuance of this renewed operating license will not be inimical to the common defense and security or to the health and safety of the public;
  - I. After weighing the environmental, economic, technical, and other benefits of the facility against environmental and other costs and considering available alternatives, the issuance of this renewed Facility Operating License No. DPR-20, subject to the conditions for protection of the environment set forth herein, is in accordance with 10 CFR Part 51 (formerly Appendix D to Part 50), of the Commission's regulations and all applicable requirements have been satisfied; and
  - J. The receipt, possession, and use of source, byproduct, and special nuclear material as authorized by this renewed operating license will be in accordance with 10 CFR Parts 30, 40, and 70.
2. Operating License No. DPR-20, dated February 21, 1991, as amended, was superseded in its entirety by Renewed Facility Operating License No. DPR-20 (previously issued to Consumers Energy Company), is hereby issued to ENP and ENO as follows:
- A. This renewed license applies to the Palisades Plant, a pressurized light water moderated and cooled reactor and electrical generating equipment (the facility). The facility is located in Van Buren County, Michigan, and is described in the Palisades Plant Updated Final Safety Analysis Report, as supplemented and amended, and in the Palisades Plant Environmental Report, as supplemented and amended.
  - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:

- a. ENO 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. ENO 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. ENO 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) [deleted]

(5) [deleted]

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**ENCLOSURE 3**

**LICENSE AMENDMENT REQUEST TO CORRECT RENEWED FACILITY  
OPERATING LICENSE**

MARK-UP OF RENEWED FACILITY OPERATING LICENSE PAGES 1, 2, 4, and 5  
(showing proposed changes to facsimile license pages)  
(additions are highlighted; deletions are strikethrough)

4 Pages Follow

ENTERGY NUCLEAR PALISADES, LLC  
ENTERGY NUCLEAR OPERATIONS, INC.  
DOCKET NO. 50-255  
PALISADES NUCLEAR PLANT  
RENEWED FACILITY OPERATING LICENSE

Renewed License No. DPR-20

1. The Nuclear Regulatory Commission (NRC or the Commission) having previously made the findings set forth in Operating License No. DPR-20, dated February 21, 1991, has now found that:
  - A. The application for Renewed Operating License No. DRP-20 ~~filed by Entergy Nuclear Palisades, LLC (ENP) and Entergy Nuclear Operations, Inc. (ENO)~~ 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, and all required notifications to other agencies or bodies have been duly made;
  - B. Construction of the Palisades Plant (the facility) has been completed in conformity with Provisional Construction Permit No. CPPR-25 and the application, as amended, the provisions of the Act, and the regulations of the Commission, and has been operating under facility operating license since February 21, 1991;
  - C. Actions have been identified and have been or will be taken with respect to:
    - (1) managing the effects of aging on the functionality of structures and components that have been identified to require review under 10 CFR 54.21(a)(1) during the period of extended operation, and (2) time-limited aging analyses that have been identified to require review under 10 CFR 54.21(c), such that there is reasonable assurance that the activities authorized by this renewed operating license will continue to be conducted in accordance with the current licensing basis, as defined in 10 CFR 54.3 for the facility, and that any changes made to the facility's current licensing basis in order to comply with 10 CFR 54.29(a) are in accordance with the Act and the Commission's regulations;

- D. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
  - E. There is reasonable assurance: (i) that the activities authorized by this renewed operating license 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 set forth in 10 CFR Chapter I;
  - F. **Entergy Nuclear Palisades, LLC (ENP)** is financially qualified and **Entergy Nuclear Operations, Inc. (ENO)** is financially and technically qualified to engage in the activities authorized by this renewed operating license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;
  - G. ENP and ENO have satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements" of the Commission's regulations;
  - H. The issuance of this renewed operating license will not be inimical to the common defense and security or to the health and safety of the public;
  - I. After weighing the environmental, economic, technical, and other benefits of the facility against environmental and other costs and considering available alternatives, the issuance of this renewed Facility Operating License No. DPR-20, subject to the conditions for protection of the environment set forth herein, is in accordance with 10 CFR Part 51 (formerly Appendix D to Part 50), of the Commission's regulations and all applicable requirements have been satisfied; and
  - J. The receipt, possession, and use of source, byproduct, and special nuclear material as authorized by this renewed operating license will be in accordance with 10 CFR Parts 30, 40, and 70.
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- a. ENO 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. ENO 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. ENO 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) ~~[deleted] 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.~~
  - ~~— For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.~~
  - ~~— For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.~~
  - ~~— For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.~~
- (5) ~~[deleted] In lieu of the specified frequencies, ENO may complete the surveillance requirements (SRs) noted in Table 2.C.(5) on Page 5 during the next refueling outage, but no later than April 30, 2003.~~



<b>TABLE 2.C.(5)</b>	
Surveillance Requirement	Description
SR 3.3.3.3 (for Table 3.3.3-1, Item 3.a)	Channel Calibration of Safety Injection and Refueling Water Tank Low Level.
SR 3.3.4.3 (for Table 3.3.4-1, Item 1)	Channel Functional Test of Safety Injection Signal (SIS) function.
SR 3.3.4.3 (for Table 3.3.4-1, Item 3)	Channel Functional Test of Recirculation Actuation Signal function.
SR 3.3.5.1	Channel Functional Test of Diesel Generator Undervoltage Start logic.
SR 3.5.2.8 (High Pressure Safety Injection to Hot Leg 1 Valves MO-3082 and MO-3083 only)	Throttle valve position stop is in correct position.
SR 3.7.8.2 (Non-Critical Service Water Header Isolation Valve CV-1359 only)	Automatic valve actuates to the correct position on actual or simulated actuation signal.
SR 3.8.1.7	Emergency AC power performs as required on actual or simulated loss-of-offsite power (LOOP) signal.
SR 3.8.1.9	Emergency AC power performs as required on actual or simulated restoration of offsite power.
SR 3.8.1.10	Load sequencing for each automatic load sequencer.
SR 3.8.1.11	Emergency AC power performs as required on actual or simulated LOOP signal in conjunction with actual or simulated SIS.

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