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May 13, 2008

10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

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

Three-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

Reference: NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008.

Dear Sir or Madam:

The U. S. Nuclear Regulatory Commission (NRC) issued NRC Generic Letter (GL) 2008-01 to request that each licensee evaluate its emergency core cooling system, decay heat removal system, and containment spray system licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the GL to provide the following information:

- "(a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,

- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.”

Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee provide a response within three months of the date of the GL. In the three-month response, the licensee was “requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.” As documented in ENO letter of May 1, 2008, ENO received verbal concurrence from the NRC to extend the due date of this three-month response to May 13, 2008.

Entergy Nuclear Operations (ENO) does not expect to complete the requested actions at the Palisades Nuclear Plant (PNP) prior to the nine-month schedule. Therefore, ENO is providing the enclosed response for the requested information in GL 2008-01 to document the planned actions and associated schedule for PNP.


#### Summary of Commitments

This letter contains the following new commitments:

1. Complete the detailed walkdowns of inaccessible sections of systems described in GL 2008-01 prior to startup from the 2009 refueling outage.
2. Complete evaluations of GL 2008-01 subject systems within 60 days following the completion of the 2009 refueling outage.
3. Any other corrective actions that are identified during the 2009 refueling outage that cannot be completed during the outage will be implemented prior to restart following the 2010 refueling outage. ENO will provide a supplemental submittal within 60 days of the completion of the 2009 refueling outage describing any remaining corrective actions and their schedule for completion.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on  
May 13, 2008.



Christopher J. Schwarz  
Site Vice President  
Palisades Nuclear Plant

Enclosure

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

**ENCLOSURE 1**  
**PALISADES NUCLEAR PLANT THREE-MONTH RESPONSE TO NRC**  
**GENERIC LETTER 2008-01**

Entergy Nuclear Operations, Inc. (ENO) is providing this three-month response to NRC Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008, for Palisades Nuclear Plant (PNP). This response discusses:

1. the required evaluations that will not be complete by October 11, 2008 (nine months from the date of GL 2008-01),
2. the alternative course of action planned, and
3. the basis for the acceptability of the alternative course of action.

Scope of Effort

The scope of evaluations required to support the response to Generic Letter 2008-01 include the following systems:

- residual heat removal system (low pressure safety injection and shutdown cooling portion)
- safety injection system (high pressure safety injection)
- containment spray system

The evaluations will include review of the four principle areas addressed in GL 2008-01: licensing basis, design, testing and corrective actions. Actions that will be taken include performance of a thorough review of licensing bases, plant and programmatic procedures, Technical Specifications, design drawings and our corrective action program database. Walkdowns will be performed for piping systems to confirm items such as adequate vent capability for system high points, and verification of design drawings. Previous drawing reviews and design basis verifications will be used as part of this process

The evaluations of these systems will be performed as requested in GL 2008-01; however, not all evaluations will be completed within the schedule outlined in the GL.

Evaluations that will not be complete by October 11, 2008

The information in GL 2008-01 requests a description of the results of evaluations that were performed. The evaluations performed are those required to ensure that gas accumulations are maintained less than the amount that challenges operability of these systems. It will not be possible to perform the walkdowns on portions of these systems

before October 11, 2008, because of the need for a refueling outage to complete the walkdowns.

Therefore, due to the inability to complete the walkdowns in containment, the requested evaluations for these systems will not be complete by October 11, 2008. The need to perform the inspections during a refueling outage is based on the following:

- The walkdowns of these systems require entry into areas of high radiation (such as inside the bioshield wall) during power operations.
- Erection of scaffolding may be prohibitive during power operations for locations near safety related equipment, or if high radiation levels exist in the area of concern that would preclude scaffolding installation.

#### Alternative Course of Actions Planned

ENO will perform detailed walkdowns during the 2009 refueling outage of those areas only accessible during an outage and will evaluate the findings upon completion. All other system detailed walkdowns will be performed during the nine-month timeframe as prescribed by GL 2008-01.

ENO will complete any corrective actions that are identified that can be reasonably performed during the 2009 refueling outage. Any other corrective actions that are identified during that refueling outage that cannot be completed, and do not affect the ability to maintain affected systems operable, will be implemented prior to restart following the subsequent refueling outage, scheduled for 2010. ENO will provide a supplemental submittal within 60 days of the completion of the 2009 refueling outage describing any corrective actions and their schedule for completion.

#### Acceptability of Alternative Course of Action:

The alternative course of action is acceptable based on the operational experience and previous actions taken to resolve identified issues.

- Previous surveillance testing performed on GL 2008-01 subject systems and interviews with operations personnel have confirmed that there are currently no known gas voiding issues at PNP.
- In-service testing of the GL 2008-01 subject systems are routinely performed and no known issues impacting pump operability have been identified during this testing.
- Venting procedures have been improved at PNP and pump vent valves are provided to ensure adequate pump venting and filling for gas accumulation issues.

ENO has confidence that the GL 2008-01 subject systems can perform their required design functions based on the above described operating experience, surveillance and performance testing and past corrective actions that have been performed to manage gas intrusion issues at the PNP.

ENO has concluded that completing performance of detailed walkdowns on portions of subject piping systems that require refueling outages, and subsequent evaluations outside the requested nine-month period is an acceptable alternative course of action for the PNP.