



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043
Tel 269 764 2000

July 21, 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 for License Condition to Support Implementation of
Extended In-Service Inspection Interval

Reference: Letter from NRC to Mr. Gordon Bischoff, Manager Owners Group Program Management Office, "Final Safety Evaluation for Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR) WCAP-16168-NP, Revision 2, 'Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval,' (TAC No. MC9768)," dated May 8, 2008 (ADAMS Accession numbers ML081060051 and ML081060045)

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 to the renewed facility operating license for the Palisades Nuclear Plant. The license amendment is needed to support a proposed change to the in-service inspection program that is based on topical report WCAP-16168-NP-A, Revision 2, "Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval." In the referenced safety evaluation of the topical report, the NRC required licensees to amend their licenses to require that the information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) be submitted for NRC staff review and approval within one year of completing the required reactor vessel weld inspection. ENO proposes to add a new license condition to provide this information. The NRC also required licensees to submit a request for a proposed alternative, conforming with 10 CFR 50.55a(a)(3)(i), to extend the in-service inspection interval. ENO is submitting that request separately and concurrently with this proposed license amendment request.

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 page reflecting the proposed change. The proposed change is incorporated on new license page 5b and, as a result, no markup pages are provided.

ENO requests approval of the proposed license amendment by March 2, 2009, and that the amendment be implemented within 60 days.

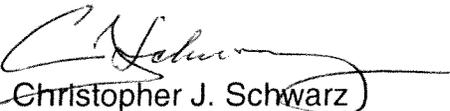
By letter dated May 5, 2008, ENO requested NRC review and approval of a proposed license amendment to DPR-20 to correct an error generated when the renewed facility operating license was created, and to remove several outdated license conditions. The placement of existing license conditions and the proposed new license condition could be affected when the license amendment request from May 2008 is approved. 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 revision to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 21, 2008.



Christopher J. Schwarz
Site Vice President
Palisades Nuclear Plant

Enclosures (2)

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

ENCLOSURE 1
DESCRIPTION OF REQUESTED CHANGES

1.0 DESCRIPTION

Entergy Nuclear Operations, Inc (ENO) requests Nuclear Regulatory Commission (NRC) review and approval of a proposed license amendment to the renewed facility operating license for the Palisades Nuclear Plant (PNP). The license amendment is needed to support a proposed change to the in-service inspection program that is based on topical report (TR) WCAP-16168-NP-A, Revision 2, "Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval." In the safety evaluation (SE) of the TR (Reference 1), the NRC required licensees to amend their licenses to require that the information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) be submitted for NRC staff review and approval within one year of completing the required reactor vessel weld inspection. ENO proposes to add a new license condition to provide this information. The NRC also required licensees to submit a request for a proposed alternative, conforming with 10 CFR 50.55a(a)(3)(i), to extend the in-service inspection interval. ENO is submitting that request separately and concurrently with this proposed license amendment request.

2.0 PROPOSED CHANGE

ENO proposes to revise renewed facility operating license DPR-20 to add the following new license condition 2.C.(8):

- (8) Upon implementation of Amendment 2xx, within one year of completing each of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Category B-A and B-D reactor vessel weld inspections, submit information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) to the NRC.

3.0 BACKGROUND

By letter dated May 8, 2008 (Reference 1), the NRC indicated that WCAP-16168-NP-A, Revision 2, is acceptable for referencing in license amendment requests for pressurized water reactor plants in accordance with the limitations and conditions in the SE. ENO submitted a request for a proposed alternative pursuant to 10 CFR 50.55(a)(3)(i) to extend the inspection interval for reactor vessel pressure retaining welds, examination category B-A and B-D. Additionally, in accordance with the SE, ENO is submitting this license amendment request for PNP.

4.0 TECHNICAL ANALYSIS

The applicable NRC SE condition and the action ENO has taken to address it are:

Within one year of completing each of the ASME Code, Section XI, Category B-A and B-D [reactor vessel] RV weld inspections required in the proposed ISI interval, the licensee must provide the information and analyses requested in Section (e) of the final 10 CFR 50.61a (or Alternative fracture toughness requirements for protection against pressurized thermal shock, in Enclosure 1 to the proposed rulemaking in SECY-07-0104, Reference 12, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a). Licensees that do not implement 10 CFR 50.61a must amend their licenses to require that the information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) will be submitted for NRC staff review and approval. The amendment to the license shall be submitted at the same time as the request for alternative.

The proposed license condition 2.C.(8) in this amendment request includes all required elements listed.

The combination of the proposed alternative pursuant to 10 CFR 50.55a(a)(3)(i) and the proposed license condition in this amendment request conforms to the conditions and limitations imposed by the NRC SE for WCAP-16168-NP-A, Revision 2 (Reference 1). 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 amendment changes the renewed facility operating license by adding a license condition to require that the information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) will be submitted for NRC staff review and approval within one year of completing the required reactor vessel weld inspection. 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.

The proposed changes are administrative and have 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.

The proposed changes are administrative and have 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.

The proposed changes are administrative and have 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 is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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. Letter from NRC to Mr. Gordon Bischoff, Manager Owners Group Program Management Office, “Final Safety Evaluation for Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR) WCAP-16168-NP, Revision 2, ‘Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval,’ (TAC No. MC9768),” dated May 8, 2008 (ADAMS Accession numbers ML081060051 and ML081060045).

ENCLOSURE 2

**LICENSE AMENDMENT REQUEST FOR LICENSE CONDITION TO SUPPORT
IMPLEMENTATION OF EXTENDED IN-SERVICE INSPECTION INTERVAL**

RENEWED FACILITY OPERATING LICENSE PAGE CHANGE INSTRUCTIONS

AND

**REVISED RENEWED FACILITY OPERATING LICENSE PAGE 5b
(shown on facsimile license page)**

2 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

NA

INSERT

Operating License, Page 5b*

* Coordinate new page(s) with license amendment request to Correct Renewed Facility Operating License (ADAMS accession # ML081270068)

- (8) Upon implementation of Amendment 2xx, within one year of completing each of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Category B-A and B-D reactor vessel weld inspections, submit information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) to the NRC.