



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
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August 28, 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: Changes to Technical Specification Administrative Controls Section

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 (PNP). The proposed amendment changes Technical Specifications (TS) Administrative Controls section 5 to incorporate NRC-approved Technical Specification Task Force (TSTF) Improved Technical Specification (ITS) TSTF-363, "Revise Topical Report references in ITS 5.6.5, [Core Operating Limits Report] COLR," revision 0. ENO also proposes to make an administrative change to the plant staff qualifications section.

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

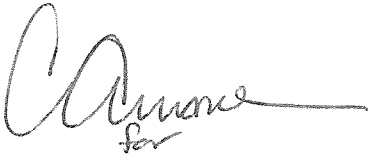
ENO requests approval of this proposed license amendment by September 1, 2009, with the amendment to be implemented within 60 days.

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 August 28, 2008.

A handwritten signature in black ink, appearing to read "C. Schwarz" with a long horizontal flourish extending to the right. Below the main signature, the word "for" is written in a smaller, cursive script.

Christopher J. Schwarz
Site Vice President
Palisades Nuclear Plant

Enclosures (3)

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 to amend renewed facility operating license DPR-20 for the Palisades Nuclear Plant (PNP). The proposed amendment affects the Technical Specifications (TS) Administrative Controls section. The proposed amendment changes TS Administrative Controls section 5 to incorporate Nuclear Regulatory Commission (NRC)-approved Technical Specification Task Force (TSTF) Improved Technical Specification (ITS) change TSTF-363, "Revise Topical Report references in ITS 5.6.5, [Core Operating Limits Report] COLR," revision 0. ENO also proposes to make an administrative change to the plant staff qualifications section.

2.0 PROPOSED CHANGES

ENO proposes to revise TS as follows:

In TS 5.3.1, change "ANSI N18.1-1971" to "ANSI/ANS 3.1, 1978."

Change TS 5.6.5.b to read:

- "b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:"

In TS 5.6.5.b items 6, 17, and 18: delete "Revision 0,"

Markups showing the specific changes and the clean TS pages with those changes incorporated are provided in Enclosure 2 and 3, respectively.

3.0 BACKGROUND

Amendment 169 to facility operating license DPR-20, dated July 26, 1995, added the COLR section to the PNP TS. This amendment predated TSTF-363 and PNP conversion to Standard Technical Specifications (STS). Therefore, the request did not fully model the NRC approved version of TSTF-363 or the current revision of the STS.

Amendment 189 to facility operating license DPR-20, dated November 30, 1999, converted PNP TS to STS. This amendment did not fully model the NRC approved version of TSTF-363 or the existing version of the STS.

Amendment 224 to renewed facility operating license DPR-20, dated April 11, 2007, was the conforming amendment for the sale of PNP to ENO. ENO submitted Quality Assurance Program Manual (QAPM), revision 16, on June 15, 2007 (Reference 1). Entergy QAPM revision 16 extended the Entergy

Quality Assurance Program to PNP. PNP minimum staff qualification requirements in TS section 5.3.1 are affected by the Entergy QAPM.

4.0 TECHNICAL ANALYSIS

The proposed change to TS 5.3.1 updates the ANSI reference for minimum staff qualifications. The proposed plant staff minimum qualification ANSI standard would be changed to match the standard described in the Entergy QAPM. ENO considers this proposed change to be administrative in nature.

The proposed change to TS 5.6.5.b revises the wording to be consistent with NRC approved TSTF-363, revision 0 and NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants." Revision 16 to the PNP COLR (Reference 2) added the identification information expected by TSTF-363 for each topical report cited in TS 5.6.5.b. ENO considers this proposed change to be administrative in nature.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc (ENO) requests to amend renewed facility operating license DPR-20 for the Palisades Nuclear Plant. The proposed amendment changes TS Administrative Controls section 5 to incorporate Nuclear Regulatory Commission (NRC)-approved Technical Specification Task Force (TSTF) Improved Technical Specification (ITS) change TSTF-363, "Revise Topical Report references in ITS 5.6.5, [Core Operating Limits Report] COLR," revision 0. ENO also proposes to make an administrative change to the plant staff qualifications section.

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 does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are administrative or provide clarification only.

The proposed changes do not have any impact on the integrity of any plant system, structure, or component that initiates an analyzed event. The proposed changes will not alter the operation of, or otherwise

increase the failure probability of any plant equipment that initiates an analyzed accident. Thus, the probability of any accident previously evaluated is not significantly increased.

The proposed changes do not affect the ability to mitigate previously evaluated accidents, and do not affect radiological assumptions used in the evaluations. The proposed changes do not change or alter the design criteria for the systems or components used to mitigate the consequences of any design basis accident. 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. Thus, the radiological consequences of any accident previously evaluated are not increased.

Therefore, operation of the facility in accordance with the proposed amendment does 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 amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment does not involve a physical alteration of any SSC or a change in the way any SSC is operated. The proposed amendment does not involve operation of any required SSCs in a manner or configuration different from those previously recognized or evaluated. No new failure mechanisms will be introduced by the changes being requested.

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 amendment does not involve a significant reduction in a margin of safety. The proposed amendment does not affect any margin of safety. The proposed amendment does not involve any physical changes to the plant or manner in which the plant is operated.

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).

5.2 Applicable Regulatory Requirements/Criteria

The function of the "Administrative Controls" section of the TS, as stated in 10 CFR 50.36(d)(5), is to provide "provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The proposed changes continue to meet these objectives.

The proposed changes are consistent with NUREG-1432 and TSTF-363.

In conclusion, based on the considerations discussed 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 ENO to NRC, "Annual Report for Quality Assurance Program Manual Changes under 10 CFR 50.54(a)(3) and 10 CFR 72.140(d) Notification of Application of Approved Appendix B to 10 CFR 72 subpart G," dated June 15, 2007 (ADAMS Accession number ML071770254)
2. Letter from ENO to NRC, "Core Operating Limits Report - Revision 16," dated May 1, 2008 (ADAMS Accession number ML081500826)

8.0 PRECEDENT

By letter dated December 20, 2001, Duke Energy Corporation submitted a LAR for Oconee Nuclear Station, Units 1, 2, and 3 (ADAMS Accession number ML020520153). The LAR requested changes to the Oconee TS, specifically, changes that implement TSTF-363. By letter dated July 9, 2002, the NRC approved the LAR for Oconee (ADAMS Accession number ML021900580). Similar to this submittal, ENO is requesting approval to implement TSTF-363. ENO proposes to implement TSTF-363 with no deviations.

ENCLOSURE 2

**LICENSE AMENDMENT REQUEST: CHANGES TO TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS SECTION**

REVISED TECHNICAL SPECIFICATION PAGES
5.0-4, 5.0-25, 5.0-26, and 5.0-27
AND
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 Appendix A Technical Specifications 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

INSERT

5.0-4

5.0-4

5.0-25

5.0-25

5.0-26

5.0-26

5.0-27

5.0-27

5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

- 5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1, 1978 for comparable positions except for the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in NRC Safety Evaluation dated October 24, 2003.
- 5.3.2 The radiation safety manager shall meet the qualifications of a Radiation Protection Manager as defined in Regulatory Guide 1.8, September 1975. For the purpose of this section, "Equivalent," as utilized in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) Formal schooling in science or engineering, or (b) operational or technical experience and training in nuclear power.
- 5.3.3 The individual, required by Specification 5.2.2g, assigned to provide advisory technical support to the plant operations shift crew, shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Published in Federal Register 50 FR 43621, October 28, 1985).
- 5.3.4 (Deleted)
- 5.3.5 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
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5.6 Reporting Requirements

5.6.4 (Deleted)

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

- 3.1.1 Shutdown Margin
- 3.1.6 Regulating Rod Group Position Limits
- 3.2.1 Linear Heat Rate Limits
- 3.2.2 Radial Peaking Factor Limits
- 3.2.4 ASI Limits
- 3.4.1 DNB Limits

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

1. EMF-96-029(P)(A) Volumes 1 and 2, "Reactor Analysis System for PWRs," Siemens Power Corporation. (LCOs 3.1.1, 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
2. ANF-84-73 Appendix B (P)(A), "Advanced Nuclear Fuels Methodology for Pressurized Water Reactors: Analysis of Chapter 15 Events," Advanced Nuclear Fuels Corporation. (Bases report not approved) (LCOs 3.1.1, 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
3. XN-NF-82-21(P)(A), "Application of Exxon Nuclear Company PWR Thermal Margin Methodology to Mixed Core Configurations," Exxon Nuclear Company. (LCOs 3.2.1, 3.2.2, & 3.2.4)
4. EMF-84-093(P)(A), "Steam Line Break Methodology for PWRs," Siemens Power Corporation. (LCOs 3.1.1, 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
5. XN-75-32(P)(A) Supplements 1 through 4, "Computational Procedure for Evaluating Fuel Rod Bowing," Exxon Nuclear Company. (Bases document not approved) (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)

5.6 Reporting Requirements

5.6.5 COLR (continued)

6. EMF-2310 (P)(A), Framatome ANP, Inc., May 2001, "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors." (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
7. XN-NF-78-44(NP)(A), "A Generic Analysis of the Control Rod Ejection Transient for Pressurized Water Reactors," Exxon Nuclear Company. (LCOs 3.1.6, 3.2.1, & 3.2.2)
8. ANF-89-151(P)(A), "ANF-RELAP Methodology for Pressurized Water Reactors: Analysis of Non-LOCA Chapter 15 Events," Advanced Nuclear Fuels Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
9. EMF-92-153(P)(A) and Supplement 1, "HTP: Departure from Nucleate Boiling Correlation for High Thermal Performance Fuel," Siemens Power Corporation. (LCOs 3.2.1, 3.2.2, & 3.2.4)
10. XN-NF-621(P)(A), "Exxon Nuclear DNB Correlation for PWR Fuel Designs," Exxon Nuclear Company. (LCOs 3.2.1, 3.2.2, & 3.2.4)
11. XN-NF-82-06(P)(A) and Supplements 2, 4, and 5, "Qualification of Exxon Nuclear Fuel for Extended Burnup," Exxon Nuclear Company. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
12. ANF-88-133(P)(A) and Supplement 1, "Qualification of Advanced Nuclear Fuels' PWR Design Methodology for Rod Burnups of 62 GWD/MTU," Advanced Nuclear Fuels Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
13. XN-NF-85-92(P)(A), "Exxon Nuclear Uranium Dioxide/Gadolinia Irradiation Examination and Thermal Conductivity Results," Exxon Nuclear Company. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)

5.6 Reporting Requirements

5.6.5 COLR (continued)

14. EMF-92-116(P)(A), "Generic Mechanical Design Criteria for PWR Fuel Designs," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
 15. EMF-2087(P)(A), "SEM/PWR-98: ECCS Evaluation Model for PWR LBLOCA Applications," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, & 3.2.2)
 16. ANF-87-150 Volume 2, "Palisades Modified Reactor Protection System Report: Analysis of Chapter 15 Events," Advanced Nuclear Fuels Corporation. [Approved for use in the Palisades design during the NRC review of license Amendment 118, November 15, 1988] (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.4.1)
 17. EMF-1961(P)(A), Siemens Power Corporation, July 2000, "Statistical Setpoint/Transient Methodology for Combustion Engineering Type Reactors." (LCOs 3.1.6, 3.2.1, 3.2.2, 3.2.4, & 3.4.1)
 18. EMF-2328 (P)(A), Framatome ANP, Inc., March 2001, "PWR Small Break LOCA Evaluation Model, S-RELAP5 Based." (LCOs 3.1.6, 3.2.1, & 3.2.2)
 19. BAW-2489P, "Revised Fuel Assembly Growth Correlation for Palisades." (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
 20. EMF-2103(P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." (LCOs 3.1.6, 3.2.1, & 3.2.2)
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems limits, nuclear limits such as shutdown margin, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any mid cycle revisions or supplements, shall be provided, upon issuance for each reload cycle, to the NRC.

ENCLOSURE 3

**LICENSE AMENDMENT REQUEST: CHANGES TO TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS SECTION**

MARK-UP OF TECHNICAL SPECIFICATION PAGES

5.0-4, 5.0-25, 5.0-26, and 5.0-27
(showing proposed changes)

(additions are highlighted; deletions are strikethrough)

4 Pages Follow

5.0 ADMINISTRATIVE CONTROLS

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- 5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ~~ANSI/ANS 3.1, 1978~~ANSI-N18.1-1974 for comparable positions except for the education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC, specifically those referenced in NRC Safety Evaluation dated October 24, 2003.
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- 5.3.4 (Deleted)
- 5.3.5 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
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b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the ~~latest approved revision of the~~ following documents:

1. EMF-96-029(P)(A) Volumes 1 and 2, "Reactor Analysis System for PWRs," Siemens Power Corporation. (LCOs 3.1.1, 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
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5.6 Reporting Requirements

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5.6 Reporting Requirements

5.6.5 COLR (continued)

14. EMF-92-116(P)(A), "Generic Mechanical Design Criteria for PWR Fuel Designs," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
 15. EMF-2087(P)(A), "SEM/PWR-98: ECCS Evaluation Model for PWR LBLOCA Applications," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, & 3.2.2)
 16. ANF-87-150 Volume 2, "Palisades Modified Reactor Protection System Report: Analysis of Chapter 15 Events," Advanced Nuclear Fuels Corporation. [Approved for use in the Palisades design during the NRC review of license Amendment 118, November 15, 1988] (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.4.1)
 17. EMF-1961(P)(A), ~~Revision 0~~, Siemens Power Corporation, July 2000, "Statistical Setpoint/Transient Methodology for Combustion Engineering Type Reactors." (LCOs 3.1.6, 3.2.1, 3.2.2, 3.2.4, & 3.4.1)
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 19. BAW-2489P, "Revised Fuel Assembly Growth Correlation for Palisades." (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
 20. EMF-2103(P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." (LCOs 3.1.6, 3.2.1, & 3.2.2)
- c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems limits, nuclear limits such as shutdown margin, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any mid cycle revisions or supplements, shall be provided, upon issuance for each reload cycle, to the NRC.