



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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10 CFR 50.48

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

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

Supplemental Information to Request for Extension of Discretion for the Interim Enforcement Policy for Fire Protection Issues on 10 CFR 50.48(c), National Fire Protection Association Standard NFPA 805

Dear Sir or Madam:

Entergy Operations, Inc. and Entergy Nuclear Operations, Inc (Entergy) letter ENOC-08-00042, dated August 28, 2008, requested the period of the subject enforcement discretion be extended until the Nuclear Regulatory Commission's (NRC) approval of license amendment requests that are to be submitted for Arkansas Nuclear One, Units 1 and 2, Waterford 3 Steam Electric Station, and Palisades Nuclear Plant (PNP). On November 3, 2008, a conference call was held with the NRC and Entergy. Additional information on the progress of the NFPA 805 transition activities at PNP, since the end of August, was requested. The PNP progress information is provided in the enclosure to this letter.

Summary of Commitments

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

A handwritten signature in cursive script that reads "Laurie Lahti".

Laurie A Lahti
Licensing Manager
Palisades Nuclear Plant

Enclosure

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

ENCLOSURE 1
SUPPLEMENTAL INFORMATION TO REQUEST FOR EXTENSION OF DISCRETION
FOR THE INTERIM ENFORCEMENT POLICY FOR FIRE ISSUES ON
10 CFR 50.48(c), NATIONAL FIRE PROTECTION ASSOCIATION STANDARD
NFPA 805

Entergy Operations, Inc. and Entergy Nuclear Operations, Inc (Entergy) letter ENOC-08-00042, dated August 28, 2008, requested the period of the subject enforcement discretion be extended until the Nuclear Regulatory Commission's (NRC) approval of license amendment requests (LAR) that are to be submitted for Arkansas Nuclear One, Units 1 and 2, Waterford 3 Steam Electric Station, and Palisades Nuclear Plant (PNP). On November 3, 2008, in a conference call with the NRC and Entergy, additional information on the progress of the NFPA 805 transition activities at PNP since the end of August was requested. The information is provided below.

Progress on the NFPA 805 transition activities as described below is based on the PNP schedule line items and estimated completion percentages. As was noted in the November 3, 2008, conference call, the estimated completion does not compare directly to the progress values in the August 28, 2008, enforcement discretion extension request. The progress values in the enforcement discretion extension request were based on a Nuclear Energy Institute (NEI) template that was developed in an effort to have consistency in the industry reporting. Comparing progress to the NEI template values resulted in small incremental changes to the previously provided information that did not characterize work efforts completed since the end of August. The following items indicate the progress that has been made since the August submittal.

1. NFPA 805, Chapter 3, fundamental element review (B-1 Table): Schedule line item 78 has progressed about 5% from approximately 24% to approximately 29% completion.
2. NFPA code compliance review: Schedule line item 93, when compared to its known scope in August, has progressed about 7% from approximately 28% to approximately 35% completion. However, since the end of August, additional code compliance review work was identified adding almost 700 hours of work to the schedule. As a result, there is a reduction in the percent complete to approximately 25%. This additional work scope is planned to be completed within the existing schedule.
3. Review of existing fire protection engineering equivalency (Generic Letter 86-10, "Implementation of Fire Protection Requirements") evaluations: Schedule line item 100 has progressed about 4% from approximately 57% to approximately 61% completion.
4. Review of credited NRC fire protection/10 CFR 50, Appendix R, exemptions: Schedule line item 106 has progressed about 3% from approximately 33% to approximately 36% completion.

5. Identification of cable and raceway locations in support of the determination of where off-site power survives a fire: Schedule line item 160 has progressed about 4% from approximately 66% to approximately 70% completion.
6. Cable selection in support of completion of the non-power operational modes review: Schedule line item 201 has progressed about 2% from approximately 10% to approximately 12% completion.
7. The move to Modular Accident Analysis Program (MAAP) version 4.06 was completed. Except for the remaining PNP owner review, approximately 20% of the final portion of this task has been completed since the end of August.
8. Pre-initiator human error probability (HEP) development: The process for completing an update of pre-initiator development was completed. Review began on approximately 25% of the revised pre-initiator calculations since the end of August. Approximately 75% of the task remains to be completed.
9. Post-initiator HEP updates: About 10% of the error models have been updated since the end of August, and are currently being reviewed. Updated criteria for revised timing analysis to support HEP completion times are being developed but are not finalized. About 10% of the task is complete.
10. Logic models:
 - Containment isolation system development that includes among other enhancements detailed containment high pressure circuitry modeling. About 20% of this model has been completed since the end of August. Status is approximately 80% complete.
 - The human reliability model, associated instrument and control logic, is approximately 70% complete. About 30% of this task has been completed since the end of August.
 - Very-very small break model development. This logic addresses spurious head vent behavior. This effort began after August and is about 20% complete.
 - Update of fuel oil transfer model: Since August the task has progressed about 20%. A change to the fuel oil transfer model was completed and is pending formal review before inclusion into the new probability risk assessment model. The task is approximately 90% complete.

- Independent review and validation of AC and DC power support system logic: Resolution of identified issues is approximately 90% complete. Primary efforts since the end of August have been to include items requiring model updates. The task progressed approximately 10% since August.
 - Since the end of August, about 40% of the fire system hydraulic analysis has been completed. The analysis credits fire pumps P-9A, P-9B and P-41 for steam generator makeup through an auxiliary feedwater pump with a stuck rotor. The task is approximately 90% complete.
11. Multiple spurious operations (MSO) expert panel review open items: About 20% of the MSO open items have been completed since the end of August. The task is about 60% complete.
 12. Review of about 7000 work orders (WOs) in support of the component failure probability data update: Review of about 1500 WOs, about 20% of the task, has been completed since the end of August. Approximately 500 WOs remain. The task is approximately 90% complete.