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10 CFR 50.4

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

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

Additional Actions Taken to Address Confirmatory Action Letter - Palisades Nuclear Plant Commitments to Address Degraded Spent Fuel Pool Storage Rack Neutron Absorber

Dear Sir or Madam:

On February 11, 2009, Entergy Nuclear Operations, Inc. (ENO) notified the Nuclear Regulatory Commission (NRC) of actions completed to reestablish compliance with site license requirements for the spent fuel pool addressed in the Confirmatory Action Letter (CAL) dated September 18, 2008. These actions included implementation of license amendment 236 to revise Technical Specifications (TS) as they apply to the spent fuel pool storage requirements for the region I spent fuel pool and north tilt pit fuel storage racks. This license amendment revised TS 3.7.16 and 4.3.1.

In addition to the actions described in the February 11, 2009, letter, ENO has implemented supplementary actions to ensure that spent fuel pool storage is in compliance with the revised TS 3.7.16 and 4.3.1. Fuel assemblies stored in the spent fuel pool were verified to be in compliance with the storage requirements in the revised TS. Technical specification bases were changed in accordance with TS 5.5.12, "Technical Specifications Bases Control Program," to align with the revised TS. The revised bases include explanation of key terms used in the revised TS and how fuel assembly enrichment tolerances are addressed. These bases changes are consistent with the criticality analysis that was submitted in support of amendment 236.

Three procedures were revised to provide assurance that the revised TS will be met. System Operating Procedure 28, "Fuel Handling System," was enhanced to include an explicit reference to TS LCO 3.7.16 and a requirement to immediately notify the operations shift manager upon discovery of a mis-loaded fuel assembly. Administrative Procedure 4.00, "Operations Organization, Responsibilities, and Conduct," was

enhanced to require direct supervision of fuel handling activities by senior reactor operator licensed or certified personnel.

Engineering Manual Procedure EM-04-29, "Guidelines for Preparing Fuel Movement Plans," was revised to delete requirements in the confirmatory action letter in anticipation of closing the CAL. The CAL requirements will remain in effect under an operations standing order until the CAL is closed. Engineering Manual Procedure EM-04-29 was enhanced by making the following changes: added requirement to ensure fuel assembly move sheets are prepared and verified to meet TS requirements; added requirement for visual verification of empty face adjacent fuel assembly storage locations except as permitted; and incorporated explicit controls for storage of non-fuel bearing components.

The current cycle of operator requalification training includes reviews of TS 3.7.16 and 4.3.1 requirements and the associated bases. Until this training cycle is completed, a standing order requires supervisory operations personnel to conduct pre-job briefs with fuel handling personnel that include a discussion of the revised TS and associated TS bases changes.

ENO will revise the Updated Final Safety Analysis Report in accordance with 10 CFR 50.71(e) to reflect the changes in Amendment 236 and the associated criticality analysis.

Operations management is well aware of the issue regarding the degradation of the region I storage racks. The issue was discussed informally in shift manager meetings, and with operations crews through the operations standing order. Operations management has been involved with the development and implementation of the new TS requirements. Operations provided input for operations training on the new TS requirements. TS compliance is continually emphasized at Palisades through management oversight and training.

These additional actions provide assurance that fuel assemblies are stored in the spent fuel pool in compliance with the revised TS 3.7.16 and 4.3.1 and the supporting criticality analysis.

Summary of Commitments

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



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Palisades Nuclear Plant

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