Entergy

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Christopher J. Schwarz
Site Vice President

August 25, 2009

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

SUBJECT: License Amendment Request for a One-Time Extension to the Integrated Leak Rate Test Interval

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

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) requests the following amendment for Palisades Nuclear Plant (PNP). The proposed change would allow for a one-time extension to the ten-year frequency for the next PNP containment type A integrated leak rate test (ILRT) that is required by Technical Specification (TS) 5.5.14. The proposed change would permit the existing ILRT frequency to be extended from ten years to approximately 11.25 years.

The proposed revision would avoid the necessity of performing a Type A test six months prior to the 10th year anniversary of the completion of the last Type A test (May 3, 2001). If granted, this revision would extend the period from 120 months (ten years) to no longer than approximately 135 months between the successive tests. In terms of refueling outages, this extension would move the performance of the next ILRT from the scheduled fall 2010 refueling outage (1R21) to the scheduled spring 2012 refueling outage (1R22).

The last PNP ILRT was completed on May 3, 2001. The next ILRT is required, by TS 5.5.14, to be performed no later than May 3, 2011, approximately six months after the conclusion of 1R21. The proposed change would encompass the currently scheduled completion of 1R22, approximately twelve months beyond the present frequency. This request is for 15 months, which bounds the time to reach 1R22. This additional time is requested to allow flexibility in the schedule to address any potential extended down powers or forced outages or unforeseen issues that may arise during that outage without having to revise this request.

The proposed change has been evaluated in accordance with 10 CFR 50.91 (a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that the change involves

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no significant hazards consideration. The bases for these determinations are included in Attachment 1 along with a detailed description of the proposed change, background and technical analysis, and an Environmental Review Consideration.

Attachment 2 provides the revised TS page reflecting the proposed change.
Attachment 3 provides the annotated TS page showing the proposed change.

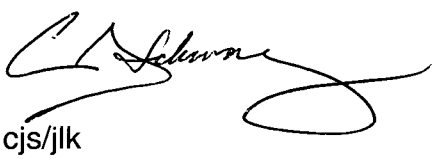
ENO requests approval of the proposed amendment by September 3, 2010. Once approved, the amendment shall be implemented within 60 days.

A copy of this request has been provided to the designated representative of the State of Michigan.

The proposed change does not include any new or revised commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 25, 2009.

Sincerely,



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Attachments: 1. Description of Requested Change
2. Revised Technical Specification Pages
3. Mark-up of Technical Specifications Pages

cc: Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

ATTACHMENT 1

LICENSE AMENDMENT REQUEST FOR A ONE-TIME EXTENSION TO THE INTEGRATED LEAK RATE TEST INTERVAL

DESCRIPTION OF REQUESTED CHANGE

LICENSE AMENDMENT REQUEST FOR A ONE-TIME EXTENSION TO THE INTEGRATED LEAK RATE TEST INTERVAL

1.0 DESCRIPTION

Entergy Nuclear Operations, Inc. (ENO) requests to amend the Renewed Facility Operations License DPR-20 for the Palisades Nuclear Plant (PNP) to revise the Appendix A, Technical Specifications (TS), Section 5.5.14, Containment Leak Rate Testing Program, requirements. The proposed change is to allow for a one-time extension to the 10-year frequency of the PNP next containment leak rate test (e.g., Integrated Leak Rate Test (ILRT) or Type A test). With the approval of the proposed change, the existing ILRT frequency would be revised from 120 months (10 years) to approximately 135 months (11.25 years).

The proposed revision would avoid the necessity of performing a Type A test six months prior to the tenth year anniversary of the completion of the last Type A test (May 3, 2001). If granted, this revision would extend the period from 120 months to approximately 135 months between the successive tests. In terms of refueling outages, this extension would move the performance of the next ILRT from the 2010 refueling outage (1R21) to the 2012 refueling outage (1R22).

ENO is proposing this revision based on the good containment leakage rate history and containment visual examination history at PNP, and because there is no substantial increase in risk associated with extending the inspection interval 15 months, as described below. 1R22 is currently scheduled to end approximately twelve months after the current ILRT due date. This request for a 15-month extension would bound the time to reach 1R22 and provide additional time to allow flexibility in the schedule to address any potential extended down powers, forced outages or unforeseen issues that may arise during that outage and the intervening time before 1R22 without having to revise this request. Including the ILRT in 1R21, which is scheduled for October 2010 (approximately 6 months prior to ILRT due date) could impact the overall length of the outage.

2.0 PROPOSED CHANGE

In TS Section 5.5.14, "Containment Leakage Rate Testing Program," 5.5.14a. states:

> A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines of Regulatory Guide 1.163, "Performance-Based Containment Leakage-Test Program," dated September 1995, as modified by the following exceptions:

The proposed change would revise this section by adding the following underlined phrase in the last sentence.

> ... guidelines of Regulatory Guide 1.163, "Performance-Based Containment Leakage-Test Program," dated September 1995, except that the next Type A test performed after the May 3, 2001, Type A test shall be performed no later than August 3, 2012, as modified by the following exceptions:.

3.0 BACKGROUND

In 1995, the Nuclear Regulatory Commission (NRC) amended 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," to provide a performance-based Option B for the containment leakage testing requirements. Option B requires that test intervals for Type A, Type B, and Type C testing be determined by using a performance-based approach. Performance-based test intervals are based on consideration of the operating history of the component and resulting risk from its failure.

Type A tests focus on verifying the leakage integrity of a passive containment structure and are performed during a period of reactor shutdown. Type B and C testing focuses on assuring that containment penetrations are essentially leak tight. These tests collectively satisfy the requirements of 10 CFR 50, Appendix J, Option B as stated in the introduction section to this Appendix:

> The purposes of the tests are to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications (TS) or associated bases; and (b) periodic surveillance of reactor containment penetrations and isolation valves is performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, was developed as a method acceptable to the staff for implementing Option B. This RG states that the Nuclear Energy Institute (NEI) guidance document, NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," provides methods acceptable to the NRC staff for complying with Option B, with four exceptions.

RG 1.163 specifies an extension in Type A frequency to at least one test in ten years based upon two consecutive successful tests.

By letter dated November 2, 1995, the NRC transmitted to NEI the final agreed upon TS that would serve as the model for licensees to develop plant-specific TS in preparing amendment requests to implement Option B.

By letter dated January 18, 1996, Consumers Energy (former owner of PNP) submitted a TS change request concerning the implementation of 10 CFR 50, Appendix J, Option B. In the NRC Safety Evaluation (SE) approving this request (letter dated October 31, 1996), it was noted the proposed TS changes are in compliance with the requirements of 10 CFR 50, Appendix J, Option B, and consistent with the guidance in RG 1.163.

With the approval of the TS change request, PNP transitioned to a performance-based ten year frequency for the Type A tests.

Section 9.1 of NEI 94-01, Revision 0, specifies that the intervals for Type A testing may be extended by up to 15 months. However, it continues by stating:

> This option should be used only in cases where refueling schedules have been changed to accommodate other factors.

The position of Section 9.1 was re-affirmed in the response to Question 37 in the Appendix J Workshop (NEI Appendix J Workshop, Questions and Answers, dated December 7-8, 1995) Questions and Answers issued March 19, 1996, by the NEI Task Force on Appendix J stated below:

> Question 37-B: Also, if a 10-year type A interval falls between refuel outages, how long may the interval be extended?
>
> Response 37-B: NEI 94-01, Section 9.1, provides for extending the intervals for the Type A tests by up to 15 months, not 25%. This option should be used only in cases where refueling schedules have been changed to accommodate other factors. The Type A test should be scheduled for the outage preceding the 10-year anniversary of the last Type A test.

The purpose of this restriction was to prevent a licensee from arbitrarily adding the 15 months on to every testing interval, which would effectively change the interval permanently to 11.25 years.

Based on a conservative application of NEI 94-01, Revision 0, and the published questions and answers, ENO believes that the 15-month extension would not apply in this particular circumstance. Accordingly, due to this interpretation, ENO is requesting an amendment to its TS to extend the test frequency one time.

4.0 TECHNICAL ANALYSIS

Primary containment provides an essentially leak-tight barrier against the uncontrolled release of radioactivity into the environment following a design basis accident. The testing requirements of 10 CFR 50, Appendix J, provide assurance that leakage from the primary containment, including systems and components that penetrate the containment, does not exceed the allowable leakage values specified in the TS.

The proposed change to extend the ILRT surveillance interval through the end of the 1R22 refueling outage is justified based on the results of previous ILRTs, containment inspection programs, and a risk evaluation.

4.1 Previous ILRT Results

Previous ILRT testing confirmed that the PNP containment structure leakage is acceptable, with considerable margin, with respect to the TS acceptance criterion of 0.1% of containment air weight at the design basis loss of coolant accident pressure.

The first PNP ILRT was completed on May 26, 1970. Subsequent PNP ILRTs were completed on May 2, 1974, March 28, 1978, November 18, 1981, January 25, 1986, November 5, 1988, and February 17, 1991. The last ILRT at PNP was completed on May 3, 2001. The second, third, and fourth post-operational tests, completed on March 1978, November 1981, and January 1986 resulted in the combined calculated leakage plus the adjusted measured penetration leakage exceeding the acceptance criteria. There have been no other failed ILRTs at PNP.

Containment penetration (Type B and C) testing is being performed in accordance with Option B of 10 CFR 50, Appendix J. The current total penetration leakage on a maximum path basis is less than 11% of the leakage allowed for containment integrity.

No modifications that require a Type A test are planned prior to 1R22, when the next Type A test would be performed under this proposed change. Any unplanned modifications to the containment prior to the next scheduled Type A test would be subject to the special testing requirements of Section IV.A of 10 CFR 50, Appendix J. There have been no pressure or temperature excursions in the containment which could have adversely affected containment integrity. There is no anticipated addition or removal of plant hardware within containment which could affect leak-tightness.

4.2 Containment Inspection Programs

PNP has established procedures for performing visual examinations of the accessible surfaces of the containment for detection of structural problems. RG 1.163, Regulatory Position C.3 specifies that these examinations should be conducted prior to initiating a Type A test and during two other outages before the next Type A test if the interval for the Type A test has been extended to ten years in order to allow for early detection of evidence of structural deterioration. These visual examinations have been completed, with no significant defects noted to date.

The ASME Section XI Program requires that the steel containment vessel be examined in accordance with the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWE, and associated modifications and limitations imposed by 10 CFR 50.55a(b)(2). The examinations required by ASME Section XI have been completed, with no significant defects noted to date. Details of the containment inservice inspection program are described in the PNP Master Inservice Inspection Plan and IWE and IWL Surveillance Plan.

The testing frequency for Type B and C tests is not affected by this requested amendment to extend the Type A test interval from 120 months (10 years) to approximately 135 months.

4.3 Risk Discussion

The allowed frequency for Type A testing was based upon a generic evaluation documented in NUREG-1493 "Performance-Based Leak-Test Program." NUREG-1493 made the following observations with regard to decreasing the test frequency:

- "Reducing the Type A (ILRT) testing frequency to one per twenty years was found to lead to an imperceptible increase in risk. The estimated increase in risk is small because ILRTs identify only a few potential leakage paths that cannot be identified by Type B and C testing, and the leaks that have been found by Type A tests have been only marginally above the existing requirements. Given the insensitivity of risk to containment leakage rate, and the small fraction of leakage detected solely by Type A testing, increasing the interval between ILRT testing has minimal impact on public risk."

- "While Type B and C tests identify the vast majority (greater than 95%) of all potential leakage paths; performance-based alternatives are feasible without significant risk impacts. Since leakage contributes less than 0.1 percent of overall risk under existing requirements, the overall effect is very small."

The surveillance frequency for Type A testing in NEI 94-01 is at least once per ten years based on an acceptable performance history.

In the Safety Evaluation (SE) for Amendment 215 to the Vermont Yankee Operating License, the Staff stated the safety and risk significance of the 15-month extension allowed by NEI 94-01, Revision 0 has already been incorporated into the models used to determine the acceptability of the testing interval.

Based on the information above, the proposed 15-month extension is bounded by the 15-month extension currently authorized within NEI 94-01.

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements and Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met.

10 CFR 50.54(o) requires primary reactor containments for water-cooled power reactors to be subject to the requirements of Appendix J to 10 CFR 50, "Leakage Rate Testing of Containment of Water Cooled Nuclear Power Plants." Appendix J specifies containment leakage testing requirements, including the types of tests required to ensure the leak-tight integrity of the primary reactor containment and systems and components that penetrate the containment. In addition, Appendix J discusses leakage rate acceptance criteria, test methodology, frequency of testing and reporting requirements for each type of test.

As discussed earlier, RG 1.163 was developed to endorse NEI 94-01, Revision 0 with certain modifications and additions.

The adoption of the Option B performance-based containment leakage rate testing for Type A testing did not alter the basic method by which Appendix J leakage rate testing is performed; however, it did alter the frequency at which Type A, B, and C containment leakage tests must be performed. Under the performance-based option of 10 CFR 50, Appendix J, test frequency is based upon an evaluation that reviews "as-found" leakage history to determine the frequency for leakage testing that provides assurance that leakage limits would be maintained. The change to the Type A test frequency did not directly result in an increase in containment leakage. Similarly, the proposed change to the Type A test frequency would not directly result in an increase in containment leakage.

Based on the considerations 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 continue to be conducted in accordance with the site licensing basis, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

In conclusion, ENO has determined that the proposed change does not require any exemptions or relief from regulatory requirements, other than the TS, and does not affect conformance with any regulatory requirements or criteria.

5.2 No Significant Hazards Consideration

A change is proposed to the PNP Technical Specifications (TS) to extend the Type A test required by TS 5.5.14 by approximately 15 months.

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 described below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed exemption involves a one-time extension to the current interval for Type A containment testing. The current test interval of 120 months (10 years) would be extended on a one-time basis to no longer than approximately 135 months from the last Type A test. The proposed extension does not involve either a physical change to the plant or a change in the manner in which the plant is operated or controlled. The containment is designed to provide an essentially leak tight barrier against the uncontrolled release of radioactivity to the environment for postulated accidents. As such, the containment and the testing requirements invoked to periodically demonstrate the integrity of the containment exist to ensure the plant's ability to mitigate the consequences of an accident, and do not involve the prevention or identification of any precursors of an accident. Therefore, this proposed extension does not involve a significant increase in the probability of an accident previously evaluated.

This proposed extension is for the Type A containment leak rate tests only. The Type B and C containment leak rate tests would continue to be performed at the frequency currently required by the PNP TS. As documented in NUREG 1493, Type B and C tests have identified a very large percentage of containment leakage paths and that the percentage of containment leakage paths that are detected only by Type A testing is very small. The PNP Type A test history supports this conclusion.

The integrity of the containment is subject to two types of failure mechanisms that can be categorized as (1) activity based and (2) time based. Activity based failure mechanisms are defined as degradation due to system and/or component modifications or maintenance. Local leak rate test requirements and administrative controls such as configuration management and procedural requirements for system

restoration ensure that containment integrity is not degraded by plant modifications or maintenance activities. The design and construction requirements of the containment combined with the containment inspections performed in accordance with ASME Section XI, the Maintenance Rule, and TS requirements serve to provide a high degree of assurance that the containment would not degrade in a manner that is detectable only by a Type A test. Based on the above, the proposed extension does not involve a significant increase in the consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed revision to the TS involves a one-time extension to the current interval for Type A containment testing. The containment and the testing requirements invoked to periodically demonstrate the integrity of the containment exist to ensure the plant's ability to mitigate the consequences of an accident and do not involve the prevention or identification of any precursors of an accident. The proposed TS change does not involve a physical change to the plant or the manner in which the plant is operated or controlled. Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change to the TS involves a one-time extension to the current interval for Type A containment testing. The proposed TS change does not involve a physical change to the plant or a change in the manner in which the plant is operated or controlled. The specific requirements and conditions of the TS Containment Leak Rate Testing Program exist to ensure that the degree of containment structural integrity and leak-tightness that is considered in the plant safety analysis is maintained. The overall containment leak rate limit specified by TS is maintained. The proposed change involves only the extension of the interval between Type A containment leak rate tests. The proposed surveillance interval extension is bounded by the 15-month extension currently authorized within NEI 94-01, Revision 0. Type B and C containment leak rate tests would continue to be performed at the frequency currently required by TS. Industry experience supports the conclusion that Type B and C testing detects a large percentage of containment leakage paths and that the percentage of containment leakage paths that are detected only by Type A testing is small. The containment inspections performed in accordance with ASME

Section XI and the Maintenance Rule serve to provide a high degree of assurance that the containment would not degrade in a manner that is detectable only by Type A testing. The combination of these factors ensures that the margin of safety in the plant safety analysis is maintained. The design, operation, testing methods and acceptance criteria for Type A, B, and C containment leakage tests specified in applicable codes and standards would continue to be met, with the acceptance of this proposed change, since these are not affected by changes to the Type A test interval. Therefore, the proposed TS change does not involve a significant reduction in a margin of safety.

Conclusion

Based on the 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.

6.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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 PRECEDENCE

This request is similar in nature to the license amendment authorized by the NRC on December 29, 1994 (ADAMS Accession Number ML011080782), for Nine Mile Point Nuclear Station Unit 1, the license amendment authorized by the NRC on June 2, 2003 (ML031320686), for Vermont Yankee Nuclear Power Station, and the license amendment authorized by the NRC on July 20, 2009 (ML091540158) for Arkansas Nuclear One, Unit No. 2.

ATTACHMENT 2

LICENSE AMENDMENT REQUEST FOR A ONE-TIME EXTENSION TO THE INTEGRATED LEAK RATE TEST INTERVAL

REVISED TECHNICAL SPECIFICATIONS PAGES

Renewed Facility Operating License Page Change Instructions

And

Revised Technical Specifications page 5.0-18

Two pages follow

ATTACHMENT TO LICENSE AMENDMENT NO.

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Remove the following page of Appendix A Technical Specifications and replace with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

REMOVE	INSERT
Page 5.0-18	Page 5.0-18

5.5 Programs and Manuals

5.5.13 Safety Functions Determination Program (SFDP) (continued)

c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

5.5.14 Containment Leak Rate Testing Program

a. A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines of Regulatory Guide 1.163, "Performance-Based Containment Leakage-Test Program," dated September 1995, except that the next Type A test performed after the May 3, 2001, Type A test shall be performed no later than August 3, 2012, as modified by the following exceptions:

1. Leakage rate testing is not necessary after opening the Emergency Escape Air Lock doors for post-test restoration or post-test adjustment of the air lock door seals. However, a seal contact check shall be performed instead.

   Emergency Escape Airlock door opening, solely for the purpose of strongback removal and performance of the seal contact check, does not necessitate additional pressure testing.

2. Leakage rate testing at P_a is not necessary after adjustment of the Personnel Air Lock door seals. However, a between-the-seals test shall be performed at $\geq$10 psig instead.

3. Leakage rate testing frequency for the Containment 4 inch purge exhaust valves, the 8 inch purge exhaust valves, and the 12 inch air room supply valves may be extended up to 60 months based on component performance.

b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a, is 53 psig. The containment design pressure is 55 psig.

c. The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.1% of containment air weight per day.

ATTACHMENT 3

LICENSE AMENDMENT REQUEST FOR A ONE-TIME EXTENSION TO THE INTEGRATED LEAK RATE TEST INTERVAL

MARK-UP OF TECHNICAL SPECIFICATIONS PAGES

Page 5.0-18

(the addition is highlighted)

One page follows

5.5 Programs and Manuals

5.5.13 Safety Functions Determination Program (SFDP) (continued)

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5.5.14 Containment Leak Rate Testing Program

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   Emergency Escape Airlock door opening, solely for the purpose of strongback removal and performance of the seal contact check, does not necessitate additional pressure testing.

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b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a, is 53 psig. The containment design pressure is 55 psig.

c. The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.1% of containment air weight per day.