



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

Christopher J. Schwarz
Site Vice President

March 8, 2010

10 CFR 73.5

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

SUBJECT: Redacted Supplement to Request for Exemption from Physical Security Requirements

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

Dear Sir or Madam:

In accordance with the requirements of 10 CFR 73.5, Entergy Nuclear Operations, Inc. (ENO) requested the Nuclear Regulatory Commission (NRC) approve an exemption from specific requirements of 10 CFR Part 73, "Physical Protection of Plants and Materials," for the Palisades Nuclear Plant by extending the deadline for the implementation of new security requirements issued by NRC in a Final Rule dated March 27, 2009 (74 FR 13926). The request for exemption was submitted on January 14, 2010 (inadvertently dated January 14, 2009).

On January 28, 2010, during a teleconference, the NRC requested that supplemental information be provided. The NRC specified during the call that a redacted version of the supplemental response would not be required. ENO submitted the supplemental information in a security-related version of this letter on February 16, 2010. On March 8, 2010, in a follow-up call, the NRC did request a redacted version. This letter provides the requested redacted version of the supplemental response.

Attachment 1 contains the requested information. ENO is no longer requesting exemption from [] or []. Attachment 2 was updated to provide the correct exemptions and dates being requested. In addition, Table 2 in Attachment 2 was revised to reflect new milestone dates based on current information. Attachment 3 was updated with the correct date being requested.

This letter identifies no new commitments and makes no revisions to existing commitments.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Schumacher', with a long horizontal line extending to the right.

cjs/bed

Attachment 1: Supplement to Request for Exemption from Physical Security Requirements
Attachment 2: Basis for Proposed Exemption
Attachment 3: Environmental Assessment

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

**ATTACHMENT 1
SUPPLEMENT TO REQUEST FOR EXEMPTION
FROM PHYSICAL SECURITY REQUIREMENTS**

A. Background

The Nuclear Regulatory Commission (NRC) issued a Final Rule for new security requirements in the Federal Register dated March 27, 2009. Per the Final Rule, new security requirements must be implemented by March 31, 2010. Entergy Nuclear Operations (ENO) has evaluated these new requirements for the Palisades Nuclear Plant (PNP) and determined that many can be implemented by the required date. However, ENO has also determined that implementation of some specific requirements will require additional time beyond March 31, 2010.

ENO is in the process of []. Delays have been experienced with the [], with the []. Once the [], time will be needed for [].

In addition, the [] is required to be [] in some areas. Due to [].

The proposed location of the [] is provided in Attachment 2, Table 3.

ENO is effecting these modifications in order to improve security protective strategies, address equipment obsolescence, and meet the requirements of the revised regulation. Modifications to the [] and installation of the [] and the [] are expected to be completed by August 31, 2010.

B. PNP Security System Upgrade Description

Major upgrades to achieve compliance with 10 CFR 73.55 include, but are not limited to:

- []
- []
- []

- []
- []
- []

Due to the [],
and in consideration of [],
[], completion of some of the new requirements
contained in 10 CFR 73.55 will require additional time beyond March 31, 2010.

Description of Modifications at Risk of Meeting Implementation Date

A new [] is being installed. The new [] is an []

[]].
Attachment 2, Table 1, provides the current schedule for []
[].

Installation of the [] is necessary to accommodate []
[], which will be necessary to []
[]. This is based upon []
[].

In addition, the [] in some areas. []
[] will be required to be installed in areas where these [] are
made. These actions are necessary to offset the []
[]. Attachment 2,
Table 2, provides the current schedule for []
[].

Attachment 2, Table 3, depicts the [] and []
[], in conjunction with other [] in progress.

With approval of this exemption request, the Part 73 provisions required to be implemented by March 31, 2010, will be completed, except for the proposed exemptions described in Section C, below. These items, subject to the request for an exemption, will be implemented by August 31, 2010, as discussed above. PNP will then be in full compliance with the Final Rule.

C. Proposed Exemptions

ENO requests an exemption, from the implementation deadline only, for the items listed below. PNP's current security program, and the new requirements that will be implemented by March 31, 2010, will provide continued assurance of public health and safety and common defense and security. Accordingly, the requested exemption is authorized by law and will not endanger life or property or the common defense and security in accordance with 10 CFR 73.5. Please note that PNP is no longer requesting exemptions for [] and [].

Regulation

[] states:

[

].

Issue

[

].

[

].

Regulation

[] states:

[

].

Issue

[

].

Regulation

[] states:

[

].

Issue

[

].

**ATTACHMENT 2
BASIS FOR PROPOSED EXEMPTION**

Entergy Nuclear Operations, LLC (ENO) is requesting a schedular exemption from [], for the Palisades Nuclear Plant (PNP). The request for an exemption from the March 31, 2010, implementation date to August 31, 2010, is based on the [] and [] to meet the revised requirements.

Using established processes, the duration (study, design, construction, testing, turnover and training) of a project of this magnitude is typically 18 – 24 months. The 12-month implementation period challenged this time frame significantly. Although work is continuing on these [], it is likely that completion will be further complicated by 1) [], and 2) [].

ENO is continuing efforts to implement the remaining new Part 73 requirements identified in the March 27, 2009, Federal Register Notice (Final Rule) and associated Regulatory Guides issued in July 2009, by March 31, 2010.

Tables 1 and 2 provide the project milestone schedules for the [] associated with the specific exemptions requested. The schedules take into consideration anticipated impediments to [], which may delay []. It also considers delays in the [].

Table 3 provides a [] and the [], in conjunction with other [] in progress.

The dates below are estimates, with the exception of the August 31, 2010, end date.

Table 1 – Schedule Milestones for []

Milestone	Scheduled Completion Date
[]	March 5, 2010
[]	April 23, 2010
[]	April 23, 2010
[]	April 26, 2010
[]	June 4, 2010
[]	June 7, 2010
[]	July 2, 2010
[]	July 23, 2010
[]	August 30, 2010
[]	August 31, 2010

Table 2 – Schedule Milestones for []

Milestone	Scheduled Completion Date
[]	February 19, 2010
[]	May 7, 2010
[]	May 10, 2010
[]	June 18, 2010
[]	June 21, 2010
[]	July 30, 2010
[]	August 2, 2010
[]	August 20, 2010
[]	August 31, 2010

TABLE 3 -- SITE DRAWING SHOWING []

]

ATTACHMENT 3 ENVIRONMENTAL ASSESSMENT

ENO is requesting an exemption for PNP in accordance with 10 CFR 73.5, "Specific Exemptions." The requested exemption is schedular in nature, and would defer the compliance date for three specific provisions of 10 CFR 73.55 from March 31, 2010, to August 31, 2010. The proposed exemption is needed to []].

PNP's current security program and the new requirements that will be implemented by March 31, 2010, will provide continued assurance of public health and safety and common defense and security.

Deferral of the compliance date is a schedular change only, and therefore, does not result in any physical changes to structures, systems or components or land use at PNP. The deferral of the compliance date does not involve:

- any change to the types, characteristics, or quantities of non-radiological effluents discharged to the environment,
- any change to liquid or gaseous radioactive effluents discharged to the environment,
- any change in the type or quantity of solid radioactive waste generated,
- any change in occupational dose under normal or design basis accident conditions,
- any change in the public dose under normal or design basis accident conditions,
- any land disturbance.

Conclusion:

There is no significant radiological environmental impact associated with the proposed schedular exemption. The proposed exemption will not affect non-radiological plant effluents or any historical sites.