



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

April 13, 2010

Mr. Christopher J. Schwarz
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

**SUBJECT: PALISADES NUCLEAR PLANT BASELINE EMERGENCY PREPAREDNESS
EXERCISE INSPECTION 05000255/2010502**

Dear Mr. Schwarz:

On March 5, 2010, the U. S. Nuclear Regulatory Commission (NRC) completed a baseline emergency preparedness biennial exercise inspection at your Palisades Nuclear Plant. The enclosed report documents the inspection findings, which were discussed on March 5, 2010, with members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, one NRC-identified finding of very low safety significance was identified. The finding involved a violation of NRC requirements; however, because of the very low safety significance and because the issue was entered into your corrective action program, the NRC is treating the issue as a Non-Cited Violation (NCV) in accordance with Section VI.A.1 of the NRC Enforcement Policy.

If you contest the subject or severity of this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U. S. Nuclear Regulatory Commission - Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at the Palisades Nuclear Plant. In addition, if you disagree with the characterization of any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region III, and the NRC Resident Inspector at the Palisades Nuclear Plant. The information that you provide will be considered in accordance with Inspection Manual Chapter 0305, "Operating Reactor Assessment Program."

C. Schwarz

-2-

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Hironori Peterson, Chief
Operations Branch
Division of Reactor Safety

Docket No. 50-255
License No. DPR-20

Enclosure: Inspection Report 05000255/2010502
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-255

License No: DPR-20

Report No: 05000255/2010502

Licensee: Entergy Nuclear Operations, Inc.

Facility: Palisades Nuclear Plant

Location: Covert, MI

Dates: March 1 through 5, 2010

Inspectors: Regina Russell, Emergency Preparedness Inspector
Robert Jickling, Senior Emergency Preparedness Inspector
Thomas Taylor, Resident Inspector

Approved by: Hironori Peterson, Chief
Operations Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000255/2010502, 3/1/2010-3/5/2010; Palisades Nuclear Plant; Baseline Emergency Preparedness Biennial Exercise Inspection.

This report covers a one week period of inspection by two regional inspectors and a resident inspector. One Green finding was identified by the inspectors. The finding was considered a Non-Cited Violation (NCV) of NRC regulations. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Emergency Preparedness

- Green. The inspectors identified a finding of very low safety significance and associated NCV of 10 CFR 50.54(t), "Conditions of licenses," for the failure to complete an independent review of all program elements of the emergency preparedness program. The independent assessment did not evaluate and document the adequacy of the interfaces with State and local governments at an interval not to exceed 12 months for all groups. Specifically, Quality Assurance's assessment failed to evaluate the adequacy of interface with one of the counties in 2008, and the interface with the State and two counties was not evaluated in 2009. The licensee entered the issue in their corrective action program as CR-PLP-2009-04915.

The deficiency did not meet the criteria for traditional enforcement, therefore, was screened using the Emergency Preparedness (EP) SDP. The finding was determined to be more than minor because the finding adversely affected the EP cornerstone objective to ensure the licensee is capable of implementing adequate measures to protect the health and safety of the public in a radiological emergency. The failure to conduct the audit to evaluate the effectiveness of the EP program had the attribute associated with Offsite EP, specifically, the evaluation of the working relationship between the offsite and onsite emergency response organizations and programs. The inspector evaluated the finding using with IMC 0609, Appendix B, Sheet I, Failure to Comply flowchart. The audit program was noncompliant with a regulatory requirement not involving an EP planning standard or a risk significant planning standard; therefore, the finding was determined to be of very low safety significance (Green).

The finding has a cross-cutting component in the Problem Identification and Resolution area with the component of Self and Independent Assessments. The licensee did not conduct the self-assessments in sufficient depth to evaluate the interfaces for all offsite governments. (P.3(a)) (Section 1EP5)

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

.1 Exercise Evaluation

a. Inspection Scope

The inspectors reviewed the March 2, 2010, biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan and to verify that the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement the plan. The inspectors also reviewed records of other drills and exercises conducted in 2008 and 2009, to verify that those drills scenarios were sufficiently different from the scenario used in the March 2, 2010 exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk significant activities of emergency classification, notification, and protective action decision making, implementation of accident mitigation strategies, and correction of past exercise weaknesses in the following emergency response facilities:

- Control Room Simulator (CRS);
- Technical Support Center (TSC); and
- Emergency Operations Facility (EOF).

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the CRS, TSC, and EOF to evaluate the licensee's initial self-assessment of their exercise performance. Later, the inspectors met with the licensee's lead exercise evaluators and managers to obtain the licensee's findings and assessments of their exercise participants' performances. The self-assessments were then compared with the inspectors' independent observations and assessments to evaluate the licensee's ability to adequately critique their exercise performance. Documents reviewed are listed in the Attachment to this report.

This exercise evaluation inspection constituted one sample as defined in Inspection Procedure (IP) 71114.01-05.

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes (71114.04)

.1 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

The inspectors conducted a review of all the emergency action level changes and sampled the revisions to the emergency plan to evaluate whether the changes identified in the revisions may have decreased the effectiveness of the emergency plan. The inspection included a review of the 10 CFR 50.54(q) change process documentation. Since the last NRC emergency plan change inspection and in accordance with 10 CFR 50.54(q), Palisades Nuclear Plant Site Emergency Plan, Revision 18, was implemented based on your determination that the changes resulted in no decrease in effectiveness of the emergency plan and the revised plan continued to meet the requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. The NRC review of the revisions does not constitute formal approval of the changes; therefore, the emergency action level and emergency plan changes remain subject to future NRC inspection in their entirety. Documents reviewed are listed in the Attachment.

This emergency action level and emergency plan changes inspection constituted one sample as defined in IP 71114.04-05.

b. Findings

No findings of significance were identified.

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies (71114.05)

a. Inspection Scope

The inspectors reviewed action taken to resolve Unresolved Item 05000255/20090005-02 identified during the 2009 biennial emergency preparedness program inspection. The inspectors reviewed the independent audits and surveillances conducted by Quality Assurance in 2008 through 2009 to ensure the licensee was able to assess the overall maintenance and effectiveness of the emergency preparedness program and to determine if the independent assessments met the requirements of 10 CFR 50.54(t). The inspectors reviewed the licensee's evaluation of the adequacy of interfaces with State and local governments. The licensee provided a benchmarking summary report and audit program analysis that was reviewed by the inspectors. The inspectors reviewed the documentation and conducted additional interviews with the Quality Assurance staff members. The inspection did not represent an inspection sample.

b. Findings

Introduction: A finding of very low safety significance and associated NCV of 10 CFR 50.54(t), "Conditions of licenses," was identified by the inspectors for the failure to complete an independent review of all program elements of the emergency preparedness program.

Quality Assurance's independent assessment did not evaluate and document the adequacy of the interfaces with State and local governments at an interval not to exceed 12 months for all groups.

Description: Palisades follows the Entergy Nuclear Emergency Plan Master Audit Plan. The EP audit plan specifies the EP core scoping elements and the frequency of evaluation in each functional element. The evaluation of the adequacy of the interfaces with State and local governments is listed as a mandatory core scope element and requires evaluation during the surveillance conducted every 12 months. The Entergy Nuclear Management Manual states the audits of the emergency preparedness program must review all elements of the program at least once every 24 months. If an audit is to be performed beyond 12 months from the previous audit, an assessment shall be performed to include performance indicators.

For the Palisades Nuclear Power Plant Emergency Planning Zone (EPZ), Michigan Department of State Police Emergency Management Division is the leading state agency for emergency response planning and operations. The local governments in the EPZ include Allegan, Berrien, and Van Buren counties. In the 2008 Quality Assurance audit report, the auditor evaluated the interface of the licensee with State and local governments as satisfactory. The auditor made contact with officials from the Michigan State Police, Allegan, and Van Buren counties. Berrien County was not contacted. During the 2009 audit, the auditor made contact with Berrien County and also evaluated the interface as adequate. The State and the other two counties were not contacted. Prior to the 2009 contact, Berrien County had not been contacted for a period greater than 24 months.

As a result of the inspection, the licensee performed a bench marking study to evaluate their audit program in comparison to other programs in the industry and evaluate the use of various methodologies and performance indicators. In addition, the licensee developed a white paper discussing the issue. The study found the licensee's level of detail for monitoring performance and conducting surveillances could be improved to meet the rule criteria. The white paper found more effort should have been made when conducting the surveillances to evaluate the interfaces with all groups. The licensee's Quality Assurance proposed courses of action to improve the audit process and corrective actions to meet requirements.

Analysis: The inspectors determined the licensee's failure to conduct an independent review of all program elements of the emergency preparedness program within the specified time periods as required by regulation was a performance deficiency. Specifically, Quality Assurance's evaluation of the adequacy of the interfaces with State and local governments for all groups exceeded the 12-month and the extended 24-month audit period. The deficiency did not meet the criteria for traditional enforcement, therefore, was screened using the Emergency Preparedness SDP.

The finding was determined to be more than minor because the finding adversely affected the EP cornerstone objective to ensure the licensee is capable of implementing adequate measures to protect the health and safety of the public in a radiological emergency. The failure to conduct the audit to evaluate the effectiveness of the EP program had the attribute associated with Offsite EP, specifically, the evaluation of the working relationship between the offsite and onsite emergency response organizations and programs.

The inspector evaluated the finding using with IMC 0609, Appendix B, Sheet I, Failure to Comply flowchart. The audit program was noncompliant with a regulatory requirement not involving an EP planning standard or a risk significant planning standard; therefore, the finding was determined to be of very low safety significance (Green).

The finding involving the failure to conduct an independent review of all program elements of the emergency preparedness program has a cross-cutting component in the Problem Identification and Resolution area with the component of Self and Independent Assessments. The licensee did not conduct the self-assessments in sufficient depth to evaluate the interfaces for all offsite governments. Specifically, Quality Assurance's assessment failed to evaluate the adequacy of interface with one of the counties in 2008, and the interface with the State and two counties was not evaluated in 2009. (P.3(a))

Enforcement: 10 CFR Part 50.54(t) requires, in part, that all elements of the emergency preparedness program must be reviewed at intervals not to exceed 12 months. The review must include an evaluation for adequacy of interfaces with State and local governments.

Contrary to the above, in 2008 and 2009, the licensee failed to evaluate the adequacy of interfaces with all appropriate offsite governments. Specifically, Quality Assurance's assessment failed to evaluate the adequacy of interface with one of the counties in 2008 (Berrien) and the interface with the State and two counties (Allegan and Van Buren) in 2009. The overall conduct and effectiveness of the EP program both onsite and offsite were not reviewed to ensure all program elements of the emergency plan were being properly implemented. Because the violation was of very low safety significance and was entered into the licensee's corrective action program as CR-PLP-2009-04915, the violation is being treated as an NCV, consistent with Section VI.A.1 of the NRC Enforcement Policy (NCV 05000255/2010502-01, Inadequate Evaluation of Interface with State and Local Governments).

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Drill/Exercise Performance

a. Inspection Scope

The inspectors sampled the licensee's performance indicator (PI) submittals for Drill/Exercise Performance for the fourth quarter 2009. To determine the accuracy of the PI data reported during the period, PI definitions and guidance were used as contained in the Nuclear Energy Institute (NEI) Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5. The inspectors verified the accuracy of the number of reported drill and exercise opportunities and the licensee's critiques and assessments for timeliness and accuracy of the opportunities. The inspectors reviewed the licensee's documentation for control room simulator training sessions and other designated drills to validate the accuracy of the submittals. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one drill/exercise performance sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

.2 Emergency Response Organization Drill Participation

a. Inspection Scope

The inspectors sampled licensee submittals for the Emergency Response Organization (ERO) Drill Participation PI for the fourth quarter 2009. To determine the accuracy of the PI data reported during the period, PI definitions and guidance were used as contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5. The inspectors reviewed the licensee's records and ERO roster to validate the accuracy of the submittals for the number of ERO members assigned to fill key positions and the percentage of ERO members who had participated in a performance enhancing drill or exercise. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ERO drill participation sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspectors sampled the licensee submittals for the Alert and Notification System (ANS) PI for the fourth quarter 2009. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance were used as contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5. The inspectors reviewed the records of the licensee's reported number of successful siren operability tests as compared to the number of siren tests conducted during the reporting period to validate the accuracy of the submittals. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one alert and notification system sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.1 (Closed) Unresolved Item (URI) 05000255/2009005-02 Adequacy of Evaluation of Interface with State and Local Governments

The inspectors reviewed the independent audits and surveillances conducted by Quality Assurance in 2008 and 2009 to determine if the assessments met the requirements of 10 CFR 50.54(t). The inspectors determined a violation of NRC requirements had occurred. An NRC identified non-cited violation was documented in 1EP5 of this report and the unresolved issue was closed. Documents reviewed are listed in the Attachment.

4OA6 Management Meetings

.1 Exit Meeting Summary

On March 5, 2010, the inspectors presented the inspection results to T. Kirwin and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input items discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

T. Kirwin, General Manager Plant Operations
A. Blind, Engineering Director
D. Hamilton, Nuclear Safety Assurance Director
D. Malone, Emergency Preparedness Manager
G. Sleeper, Assistant Operations Manager – Training
D. Corbin, Assistant Operations Manager – Shift
P. Anderson, Licensing Manager
M. Frato, Security Manager
T. Mulford, Shift Manager
C. Sherman, Radiation Protection Manager
B. Ford, Maintenance Manager
J. Ford, Systems Engineering Manager
B. Kemp, Design Engineering Manager
C. Scott, Human Resources Manager
T. Shewmaker, Chemistry Manager
J. Walker, Acting Quality Assurance Manager
O. Gustafson, Entergy Continuous Improvement Manager
B. Dotson, Licensing Specialist
J. Fountain, Senior Emergency Preparedness Coordinator
J. Ridley, Emergency Preparedness Specialist
N. Brott, Senior Emergency Preparedness Coordinator

Nuclear Regulatory Commission

J. Ellegood, Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000255/2010502-01	NCV	Inadequate Evaluation of Interface with State and Local Governments
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Closed

05000255/2010502-01	NCV	Inadequate Evaluation of Interface with State and Local Governments
05000255/2009005-02	URI	Adequacy of Evaluation of Interface with State and Local Governments

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1EP1 Exercise Evaluation (71114.01)

SEP; Palisades Nuclear Plant Site Emergency Plan; Revision 18

EAL Basis; Palisades Nuclear Plant EAL Technical Basis Document, Revision 0

EI-1; Emergency Classification and Actions; Revision 50

Palisades Emergency Planning Graded Integrated Exercise Report; dated September 16, 2008

Palisades Drill Related Condition Reports Listing; 2008 through 2009

CR-HQN-2010-00242; Web EOC User Sessions Terminated Unexpectedly; dated March 4, 2010

CR-PLP-2010-000884; Training Building Siren Failed; dated March 2, 2010

CR-PLP-2010-000890; Accountability Failure; dated March 3, 2010

CR-PLP-2010-000898; Outdated PAR Chart at EOF; dated March 3, 2010

CR-PLP-2010-000899; Broken Kit Seal at EOF; dated March 3, 2010

CR-PLP-2010-000900; TSC Accountability Computer Initial Failure; dated March 3, 2010

CR-PLP-2010-000906; Scenario Data Issues; March 4, 2010

CR-PLP-2010-000908; Outdated OSC Response Team Checklists; dated March 4, 2010

CR-PLP-2010-000910; ERO Member without Permanent DLR; dated March 4, 2010

CR-PLP-2010-000911; Failure to Recognize Radiological Hazards; dated March 4, 2010

CR-PLP-2010-000912; JIC Press Releases Contained Content Errors; dated March 4, 2010

CR-PLP-2010-000913; Iodine Concentrations Not Reflected as Net CPM; dated March 4, 2010

CR-PLP-2010-000914; Incomplete Response Team Checklists; dated March 4, 2010

CR-PLP-2010-000915; Delayed ED Approval of Notification Forms; dated March 4, 2010

CR-PLP-2010-000916; Habitability Controls at EOF Not Adequately Maintained; dated March 4, 2010

CR-PLP-2010-000917; Missed Opportunity to Reduce Simulation at EOF; dated March 4, 2010

CR-PLP-2010-000918; EOF and State EOC Clocks Not Synchronized; dated March 4, 2010

CR-PLP-2010-000920; EOF Controlled Copy Procedures Missing Pages; dated March 4, 2010

CR-PLP-2010-000941; Habitability Restrictions in the Simulator; dated March 4, 2010

LO-WTPLP-2010-00106 04; Training/Briefing Process for Offsite Support; dated March 4, 2010

LO-WTPLP-2010-00106 05; Improving Response Team Deployment Process; dated March 4, 2010

LO-WTPLP-2010-00106 07; Upgrade OSC Onsite Map; dated March 4, 2010

LO-WTPLP-2010-00106 10; Onsite Survey Routes; dated March 4, 2010

LO-WTPLP-2010-00106 17; TSC Contamination Control; dated March 4, 2010

1EP4 Emergency Action Level and Emergency Plan Changes (71114.04)

10 CFR 50.54(q) Evaluation Package; Palisades Nuclear Plant Site Emergency Plan; Revision 18

CR-PLP-2009-04915; NRC EP Inspection Question Concerning 10 CFR 50.54(t) Audit Implementation

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies (71114.05)

04915; White Paper Discussing Disposition of Quality Assurance Monitoring of Emergency Preparedness

Benchmarking Summary Report Regarding Licensee Practices for Review of Emergency Preparedness Programs; dated November 30, 2009

2007-001-8-002; Nuclear Oversight Observation Report; dated March 20, 2007

QS-PAL-2008-007; Palisades Quality Assurance Surveillance Report; dated March 25, 2008

QA-7-2008-PLP-01; Quality Assurance Audit Report; dated June 9, 2008

QA-7-2008-PLP-01; Quality Assurance Audit Plan and Evidence Report; dated April 14, 2008

QS-2009-PLP-015; Palisades Quality Assurance Surveillance Report; dated April 30, 2009

Entergy Nuclear Emergency Plan Master Audit Plan (MAP); Audit Number 7; Revision 11

EN-QV-109; Entergy Nuclear Management Manual; Audit Process; Revision 16

EN-QV-105; Entergy Nuclear Management Manual; Nuclear Oversight Performance Reporting; Revision 3

EN-QV-108; Entergy Nuclear Management Manual; QA Surveillance Process; Revision 6

40A1 Performance Indicator Verification (71151)

NRC Performance Indicator Technique/Data Sheet, Alert and Notification System Reliability; 4th Quarter 2009

NRC Performance Indicator Technique/Data Sheet, Drill/Exercise Performance, 4th Quarter 2009

NRC Performance Indicator Technique/Data Sheet, ERO Drill Participation, 4th Quarter 2009

CR-PLP-2010-00106; Public Warning System Siren Rotation Failures; dated January 11' 2010

CR-PLP-2010-00565; Investigative Findings and Repair Actions for Siren Cold Weather Rotation Failure Indications; dated February 9, 2010

LIST OF ACRONYMS USED

ADAMS	Agency-wide Documents Access and Management System
ANS	Alert and Notification System
CAP	Corrective Action Program
CFR	Code of Federal Regulations
CR	Condition Report
CRS	Control Room Simulator
DRS	Division of Reactor Safety
EOF	Emergency Operations Facility
EP	Emergency Preparedness
EPZ	Emergency Planning Zone
ERO	Emergency Response Organization
IMC	Inspection Manual Chapter
IR	Inspection Report
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NRC	U. S. Nuclear Regulatory Commission
OSC	Operations Support Center
PARS	Publicly Available Records
PI	Performance Indicator
PI&R	Problem Identification and Resolution
SDP	Significance Determination Process
TSC	Technical Support Center
URI	Unresolved Item

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Sincerely,

/RA/

Hironori Peterson, Chief
Operations Branch
Division of Reactor Safety

Docket No. 50-255
License No. DPR-20

Enclosure: Inspection Report 05000255/2010502
w/Attachment: Supplemental Information

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