



Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
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Covert, MI 49043  
Tel 269 764 2000

**Christopher J. Schwarz**  
Site Vice President

May 13, 2010

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

**SUBJECT:** Supplement to License Amendment Request: Control Rod Drive  
Exercise Surveillance

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

**Reference:** 1. Entergy Nuclear Operations, Inc. letter dated March 31, 2010,  
License Amendment Request: Control Rod Drive Exercise  
Surveillance

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request (LAR) to revise the Palisades Nuclear Plant Renewed Facility Operating License. The proposed amendment would add a new license condition 2.C(4). In telephone calls on May 3, 2010, and May 10, 2010, the Nuclear Regulatory Commission staff requested that the wording in the proposed license condition be modified and that a note be added to the Technical Specifications Surveillance Requirement SR 3.1.4.3.

In response to the request for modifying the wording for the license condition 2.C(4) and adding a note to SR 3.1.4.3, ENO proposes the changes below. These changes do not change the intent of the LAR submitted in Reference 1.

In the proposed license condition 2.C(4), delete the following words at the end of the sentence: "in a maintenance or refueling outage, whichever is earlier."

The modified proposed license condition 2.C(4) would read:

"Performance of Technical Specifications Surveillance Requirement SR 3.1.4.3 is not required for control rod drive CRD-22 during cycle 21 until the next entry into Mode 3."

Add the following note to Technical Specifications Surveillance Requirement SR 3.1.4.3:

“Not required to be performed or met for control rod 22 during cycle 21 provided control rod 22 is administratively declared immovable, but trippable and Condition D is entered for control rod 22.”

Attachment 1 provides the marked-up pages to the operating license and Technical Specifications showing the revised proposed changes. Attachment 2 provides the page change instructions and revised pages to the operating license and Technical Specifications for the revised proposed changes.

In the May 10, 2010, telephone call, ENO modified its request for approval of the LAR to May 28, 2010. The amendment would be implemented by June 10, 2010.

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

#### Summary of Commitments

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

I declare under penalty of perjury that the foregoing is true and accurate. Executed on May 13, 2010.

Sincerely,



cjs/jlk

- Attachments:
1. Proposed Renewed Facility Operating License and Technical Specifications Change (mark-up)
  2. Proposed Renewed Facility Operating License and Technical Specifications Change (typed)

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

**ATTACHMENT 1**

**PROPOSED RENEWED FACILITY OPERATING LICENSE**

**and**

**TECHNICAL SPECIFICATIONS CHANGE**

**(mark-up)**

Page 4 of Renewed Operating License

And

Page 3.1.4-3 of the Technical Specifications

Two pages follow

- a. ENO may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
  - b. ENO may alter specific features of the approved fire protection program provided:
    - Such changes do not result in failure to complete the fire protection program as approved by the Commission. ENO shall maintain in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program and shall make such records available to the Commission Inspectors upon request. All changes to the approved program shall be reported along with the FSAR revision as required by 10 CFR 50.71(e); and
    - Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.
- (4) [deleted] Performance of Technical Specifications Surveillance Requirement SR 3.1.4.3 is not required for control rod drive CRD-22 during cycle 21 until the next entry into Mode 3.
- (5) [deleted]

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE		FREQUENCY
SR 3.1.4.1	Verify the position of each control rod to be within 8 inches of all other control rods in its group.	12 hours
SR 3.1.4.2	Perform a CHANNEL CHECK of the control rod position indication channels.	12 hours
SR 3.1.4.3	<p>-----NOTE-----            Not required to be performed or met for control rod 22 during cycle 21 provided control rod 22 is administratively declared immovable, but trippable and Condition D is entered for control rod 22.</p> <p>Verify control rod freedom of movement by moving each individual full-length control rod that is not fully inserted into the reactor core <math>\geq 6</math> inches in either direction.</p>	92 days
SR 3.1.4.4	Verify the rod position deviation alarm is OPERABLE.	18 months
SR 3.1.4.5	Perform a CHANNEL CALIBRATION of the control rod position indication channels.	18 months
SR 3.1.4.6	Verify each full-length control rod drop time is $\leq 2.5$ seconds.	Prior to reactor criticality, after each reinstallation of the reactor head

**ATTACHMENT 2**

**PROPOSED RENEWED FACILITY OPERATING LICENSE**

and

**TECHNICAL SPECIFICATIONS CHANGE**

(typed)

Renewed Facility Operating License and Technical Specifications  
Page Change Instructions,

Page 4 of Renewed Operating License

and

Page 3.1.4-3 of the Technical Specifications

Three pages follow

ATTACHMENT TO LICENSE AMENDMENT NO.

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Remove the following page of the Renewed Facility Operating License and replace it with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

REMOVE

Page 4

INSERT

Page 4

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

REMOVE

3.1.4-3

INSERT

3.1.4-3

- a. ENO may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
  - b. ENO may alter specific features of the approved fire protection program provided:
    - Such changes do not result in failure to complete the fire protection program as approved by the Commission. ENO shall maintain in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program and shall make such records available to the Commission Inspectors upon request. All changes to the approved program shall be reported along with the FSAR revision as required by 10 CFR 50.71(e); and
    - Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.
- (4) Performance of Technical Specifications Surveillance Requirement SR 3.1.4.3 is not required for control rod drive CRD-22 during cycle 21 until the next entry into Mode 3.
- (5) [deleted]



**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE		FREQUENCY
SR 3.1.4.1	Verify the position of each control rod to be within 8 inches of all other control rods in its group.	12 hours
SR 3.1.4.2	Perform a CHANNEL CHECK of the control rod position indication channels.	12 hours
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