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10 CFR 54

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

Subject: Revision to License Renewal Commitments

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

- References:
1. Letter dated March 22, 2005, "Application for Renewed Operating License"
  2. NUREG-1871, dated January 2007, "Safety Evaluation Report Related to the License Renewal of Palisades Nuclear Plant"

Dear Sir or Madam:

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) that Entergy Nuclear Operations, Inc (ENO) is revising five commitments identified in Reference 2, Appendix A, for the Palisades Nuclear Plant (PNP).

The revised commitments are provided in Attachment 1.

Sincerely,



DAVID HAMILTON for CJS

cjs/bed

Attachment 1: Revision to Long Term Commitments for License Renewal of Palisades Nuclear Plant

CC Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC

A112  
NRC

**ATTACHMENT 1**

**REVISION TO LONG TERM COMMITMENTS  
FOR LICENSE RENEWAL OF PALISADES NUCLEAR PLANT**

**4 Pages Follow**

REVISION TO LONG TERM COMMITMENTS  
FOR LICENSE RENEWAL OF PALISADES NUCLEAR PLANT

| No. | Original Commitment  | Revised Commitment                        | Comments   |
|-----|--|---|--|
| 7   | <p>The supporting calculations for the Palisades RI-ISI program will be reviewed, and updated as needed, to reflect a 60-year operating period; and the program inspection scope will be updated accordingly, before the period of extended operation.</p> | <p>This commitment is being canceled.</p> | <p>On June 12, 2006, Nuclear Management Company (NMC) (former license holder for the Palisades Nuclear Plant (PNP)) submitted the 4<sup>th</sup> interval inservice inspection (ISI) plan for the PNP. Included in this submittal was a relief request to align the Risk Informed (RI) ISI interval and the code year for the 4<sup>th</sup> interval ISI program. On March 21, 2007, NMC withdrew the RI-ISI relief request, which was acknowledged by the NRC on April 13, 2007.</p> <p>Any future submittal of a relief request for RI-ISI will necessarily require update of supporting calculations to reflect a 60-year operating period. Therefore, since PNP does not have a RI-ISI program now, and will not have one before entering the period of extended operation, this commitment is moot and may be cancelled.</p> |

REVISION TO LONG TERM COMMITMENTS  
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| No. | Original Commitment   | Revised Commitment  | Comments  |
|-----|---|---|---|
| 23  | <p>Develop and implement procedures for inspection of below grade fire protection system piping. Inspections shall occur when below grade piping is excavated for maintenance, and shall include pipe wall thickness (NDE or direct measurement) and documentation of aging related degradation of pipes. Procedures shall include acceptance criteria, and criteria for further corrective actions if acceptance criteria are not met.</p> | <p>Develop and implement procedures for inspection of below grade fire protection (FP) system piping. Inspections shall be implemented under the Buried Services Corrosion Monitoring Program. In addition, results of wall thickness inspections of above grade fire protection system piping shall be extrapolated to evaluate the wall thickness condition of below grade fire protection system piping. Procedures shall include acceptance criteria and criteria for further corrective actions, if acceptance criteria are not met.</p> | <p>NRC Interim Staff Guidance (ISG)-04: Aging Management of Fire Protection Systems for License Renewal, dated December 3, 2002, allowed extrapolation of results of inspections of above grade FP piping to evaluate the condition of the below grade FP piping if the environmental and material conditions that exist on the interior surface of below grade piping are similar to the conditions that exist within the interior surface of the above grade piping. The below grade piping is either cast iron or carbon steel, which is the same as above grade piping, and the environmental conditions are the same throughout the system. Exterior inspections of the piping are already included in the Buried Services Corrosion Monitoring Program.</p> |

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|-----|--|--|--|
| 26  | <p>A Non-EQ Electrical Commodities Condition Monitoring Program will be developed and implemented. Features of the program will include development and implementation of procedures to conduct periodic inspection of insulated cables and connectors, test sensitive instrumentation circuits, test medium voltage cables, and inspect manhole water levels.</p> | <p>A Non-EQ Electrical Commodities Condition Monitoring Program will be developed and implemented. Features of the program will include development and implementation of procedures to conduct periodic inspection of insulated cables and connectors, test sensitive instrumentation circuits, test medium voltage cables, inspect manhole water levels, and inspect non-segregated phase bus and connections.</p> | <p>NMC letter dated August 25, 2005, "Supplementary Information for the Palisades Application for Renewed Operating License Resulting from Aging Management Programs Audit," added inspection of non-segregated phase bus and connections to the Non-EQ Electrical Commodities Condition Monitoring Program as a result of a NRC audit of the PNP License Renewal Application (LRA).</p>   |
| 40  | <p>NMC will enhance the preventive maintenance program to periodically inspect, and replace as necessary, the expansion joints/flexible connections in the portions of the Heating, Ventilation and Air Conditioning System, and the Service Water System, that are in-scope for license renewal.</p>  | <p>ENO will enhance the preventive maintenance program to periodically inspect, and replace as necessary, the expansion joints/flexible connections in the portions of the heating, ventilation and air conditioning system that are in-scope for license renewal.</p>   | <p>The service water system (SWS) is being removed from the commitment. NMC letter dated November 18, 2005, "Response to NRC Requests for Additional Information Relating to License Renewal dated October 24, 2005," specifically stated that the elastomers in the SWS Aging Management Review tables of the LRA are not long lived components that require aging management because they are replaced on a periodic basis. Since there are no elastomers in the SWS that are required to be managed by an Aging Management Program, inclusion of the SWS in this commitment is not warranted.</p> |

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| 43  | <p>NMC will perform a neutron absorption ("blackness") test of selected cells in the NUS spent fuel racks prior to March 24, 2011, to validate that there is no significant degradation of the neutron absorption capability. An additional test will be performed within the first 10 years following the start of the period of extended operation. If degradation is identified in either test, an evaluation of the condition will be performed under the NMC Corrective Action Program. If applicable, this evaluation will consider the potential need for additional or more frequent testing.</p> | <p>ENO will perform a neutron absorption ("blackness") test of selected cells in the NUS spent fuel racks prior to March 24, 2011, to validate that there is no significant degradation of the neutron absorption capability. If degradation is identified, an evaluation of the condition will be performed under the ENO corrective action program. If applicable, this evaluation will determine the need for additional testing.</p> | <p>Initial testing was completed prior to March 2011, in accordance with the commitment. The testing showed excessive degradation. As a result, the criticality analysis was revised such that it no longer takes credit for the neutron absorber in the NUS spent fuel pool racks to maintain sufficient margin to criticality. Therefore, since no credit is taken for the neutron absorber in the NUS racks, there is no need for additional testing.</p> <p>License Amendment 236 revised the Technical Specifications to apply spent fuel pool storage restrictions for the NUS racks.</p> |