



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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Covert, MI 49043
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Thomas P Kirwin
Acting Site Vice President

PNP 2011-11

March 3, 2011

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

SUBJECT: License Amendment Request for Steam Generator Cold-Leg
Tubesheet Inspection

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

- REFERENCE:
1. Letter from NRC to Entergy Nuclear Operations, Inc., dated May 31, 2007, Palisades Nuclear Plant – Issuance of Amendment Re: Tubesheet Inspection Depth for Steam Generator Tube Inspections (TAC No. MD2125) (ADAMS Accession No. ML071420216)
 2. Letter from Arizona Public Service Company to NRC, dated May 26, 2005, Palo Verde Nuclear Generation Station Units 1, 2, and 3, "Application for Technical Specification Improvement Regarding Steam Generator Tube Integrity and Steam Generator Tube Inspection Length through the Tubesheet" (ML051520413)

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) requests Nuclear Regulatory Commission (NRC) review and approval of a proposed license amendment to revise Renewed Facility Operating License DPR-20 for the Palisades Nuclear Plant (PNP). ENO proposes to revise Appendix A, Technical Specifications (TS), as they apply to the steam generator program in TS section 5.5.8. The purpose of the change is to revise the repair criteria for the cold-leg side of the steam generator tubesheet. The proposed change would allow not having to inspect the lower portion of the cold-leg steam generator tubes within the tubesheet, since flaws in this lower portion, would be acceptable. A similar change to the TS was approved in operating license amendment no. 225 for the hot-leg side of the steam generator tubesheet (Reference 1).

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The technical bases addressing steam generator tube structural and leakage integrity are provided in the attached Westinghouse report, "Palisades Cold Leg Tubesheet Inspection Depth, C*," (Attachment 5) and Westinghouse report WCAP-16208-P, Revision 1, dated May 2005, entitled, "NDE Inspection Length for CE Steam Generator Tubesheet Region Explosive Expansions."

WCAP-16208-P, Revision 1, was previously submitted to the NRC by Arizona Public Service Company (Reference 2) for Palo Verde Units 1, 2 and 3. Therefore, the report is not being resubmitted to the NRC as part of this license amendment request. The WCAP-16208-P report was also part of the technical bases supporting NRC approval of PNP operating license amendment no. 225 (Reference 1).

This 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 this change involves no significant hazards consideration. The bases for this determination are included in Attachment 1, which provides a description of the proposed change, background discussion, technical analysis, regulatory analysis, and environmental review. Attachment 2 provides the revised TS pages reflecting the proposed changes. Attachment 3 provides the annotated TS pages showing the proposed changes.

Attachment 4 provides the Westinghouse Electric Company LLC proprietary authorization affidavit, CAW-10-2752, supporting the proprietary nature of Attachment 5. The affidavit sets forth the basis for which the information may be withheld from public disclosure by the NRC and addresses the specific considerations listed in paragraph (b)(4) of 10 CFR 2.390.

Attachment 5 contains the proprietary Westinghouse Electric Company LLC report, "Palisades Cold Leg Tubesheet Inspection Depth, C*." ENO requests that Attachment 5 be withheld from public disclosure in accordance with 10 CFR 2.390. Correspondence regarding the proprietary aspects of the Westinghouse Electric Company LLC report or the supporting affidavit should reference the affidavit CAW-10-2752 and be addressed to J.A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, Suite 428, 1000 Westinghouse Drive, Cranberry Township, PA 16066.

Attachment 6 contains the non-proprietary version of the Westinghouse Electric Company LLC report with the proprietary information deleted.

ENO requests approval of the proposed license amendment request, by March 8, 2012. The amendment will be implemented within 60 days of approval.

In accordance with 10 CFR 50.91, ENO is notifying the State of Michigan of this proposed license amendment by transmitting a copy of this letter and non-proprietary attachments to the designated state official.

Summary of Commitments

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 3, 2011.

Sincerely,



tpk/jlk

- Attachments:
1. Description and Evaluation of Requested Change
 2. Renewed Operating License Page Change Instructions and Revised Technical Specifications Pages
 3. Mark-up of Technical Specifications Pages
 4. CAW-10-2752, Affidavit
 5. Westinghouse Proprietary Class 2, SG-SGMP-10-4-P, Revision 1, February 2010, "Palisades Cold Leg Tubesheet Inspection Depth, C*"
 6. Westinghouse Non-Proprietary Class 3, SG-SGMP-10-4-NP, Revision 1, February 2010, "Palisades Cold Leg Tubesheet Inspection Depth, C*"

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