

From: Chawla, Mahesh
Sent: Thursday, March 31, 2011 4:53 PM
To: KUEMIN, JAMES L; Anderson, Paula
Cc: Pascarelli, Robert; Karwoski, Kenneth; Obodoako, Aloysius; Taylor, Robert; Yoder, Matthew; Klein, Paul; Murphy, Emmett; Lingam, Siva; Boyle, Patrick; Mahoney, Michael
Subject: LIC-109 Acceptance Review with opportunity to supplement - ME5780 - Palisades Nuclear Plant - SG Cold Leg Tubesheet Inspection

By letter dated March 3, 2011, Entergy Nuclear Operations, Inc. (ENO)(the licensee) submitted a license amendment request (LAR) for Palisades Nuclear Plant. The proposed LAR would 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 tube sheet. The proposed change would allow not having to inspect the lower portion of the cold-leg steam generator tubes within the tube-sheet, since flaws in this lower portion, would be acceptable. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested in the enclosure by **April 19, 2011**. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Jim Kuemin of your staff on **March 31, 2011**.

The NRC staff has determined that the **LAR is non-acceptable with opportunity to supplement**. The reason for the non-acceptance is that the application is not complete. It does not address the lessons learned from the H* and their effect, if any, on the C*

results. In other recent “star” proposals that extended the original hot-leg application to the cold-leg, the licensee either addressed this issue in their original submittal or the staff submitted request for additional information. Given the history of this issue (i.e., factoring in the lessons learned from the H* review into W*, F* cold-leg amendment requests), the licensee should include this in their submittal. As a reference the staff has provided the following two documents which provide similar information requested by the staff:

1) Vogtle Electric Generating Plant, Units 1 and 2, Issuance of Amendments Regarding Steam Generator Tube Inspection Alternate Inspection Criteria (TAC Nos. ME5067 and ME5068).(ADAMS Accession No. ML110660264).

2) Sequoah Nuclear Plant (SQN) – Unit 2 – Technical Specifications (TS) Change 09-02 – W* Alternate Repair Criteria (ARC) For Steam Generator (SG) Tubes Cold Leg (ADAMS Accession No. ML091530343).

The following information is needed for the acceptance review:

1. Please justify the adequacy of the proposed C* distance in light of the lessons learned from the H* review.