Entergy

Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043
Tel 269 764 2000

Thomas P Kirwin
Acting Site Vice President

PNP 2011-035

April 19, 2011

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

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

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

References:
1. Entergy Nuclear Operations, Inc. letter dated March 3, 2011, License Amendment Request for Steam Generator Cold-Leg Tubesheet Inspection
2. NRC letter, dated April 5, 2011, Palisades Nuclear Plant - Supplemental Information Needed for Acceptance of License Amendment Request for Steam Generator Cold-Leg Tubesheet Inspection (TAC No. ME5780) (ADAMS Accession No. ML110910558)

Dear Sir or Madam:

In Reference 1, Energy Nuclear Operations, Inc. (ENO) submitted a license amendment request (LAR) to the Nuclear Regulatory Commission (NRC) to revise the repair criteria in Technical Specifications (TS) section 5.5.8 for the cold-leg side of the steam generator (SG) tubesheet. The LAR was supported by Westinghouse analyses that were attached and referenced in Reference 1.

In Reference 2, the NRC notified ENO that the LAR was non-acceptable with the opportunity to supplement and, furthermore, requested the LAR supplement be submitted by April 19, 2011. The NRC indicated that the reason for the non-acceptance was that the LAR did not address the lessons learned from other plants' submittals and their effect, if any, on the analysis ENO provided in Reference 1. ENO was requested to justify the adequacy of the proposed C* distance in light of the lessons learned from

the H* review (C* refers to the repair criteria applicable to Combustion Engineering (CE) type steam generators in which the tube-to-tubesheet joint was formed by explosive expansion. H* refers to the applicable Westinghouse designed steam generators that have hydraulic expanded tube-to-tubesheet joint.).

Westinghouse did complete a similar review of H* lessons learned to the W* alternate repair criteria (W* refers to the repair criteria applicable to Westinghouse designed steam generators in which the tube-to-tubesheet joint was formed by an explosive expansion). Westinghouse has used that experience to identify pertinent elements of the H* program that might have applicability to a CE steam generator and the C* alternate repair criteria. Specifically:

a. Calculate how material property variances might affect the pullout length (full bundle versus deterministic methods).
b. Determine how divider plate cracking might affect the repair criteria.
c. Review how the potential for cracking might affect the cold-leg C*.
d. Compare CE-type explosively expanded and hydraulically expanded tube-tubesheet joint leak rates.

Westinghouse has indicated that it considers it unlikely that a review of the H* lessons learned would negatively affect the C* inspection distance. However, to provide the requested information, ENO and Westinghouse have determined that considerable effort will be required to complete an evaluation to supplement the LAR. The information cannot be provided by the requested April 19, 2011, date. As a result, ENO is withdrawing the LAR submitted in Reference 1.

Summary of Commitments

This letter contains no new commitments and no revised commitments.

Sincerely,

for T. Kirwin

tpk/jlk

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