



Entergy Nuclear Operations, Inc.
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Anthony J. Vitale
Site Vice President

PNP 2012-027

March 29, 2012

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

SUBJECT: Entergy Nuclear Operations, Inc. Answer to the March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design Basis External Events (Order Number EA-12-049)

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

Reference: Nuclear Regulatory Commission Order, Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, EA-12-049, dated March 12, 2012 (ADAMS Accession Number ML12054A736)

Dear Sir or Madam:

On March 12, 2012, the NRC issued an immediately effective Order in the captioned matter entitled "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Effective Immediately)" ("Order") to, *inter alia*, Entergy Nuclear Operations, Inc. (Entergy). The Orders state that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC had decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically with respect to this Order, the NRC is requiring additional defense-in-depth measures at licensed nuclear power reactors to address uncertainties associated with protection from beyond-design-basis external events. Licensees are specifically directed by the Order to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to

the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six-month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, Entergy hereby submits its answer to the Order. Entergy consents to the Order and does not request a hearing. Based on information currently available, Entergy has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, Entergy has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever is earlier. Entergy will provide further responses as required by Section IV.C in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of Entergy to comply with the specific compliance deadline dates based on the probable availability of that guidance, Entergy's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

This letter does not contain any commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 29, 2012.

Sincerely,


ajv/jse 3-29-12

cc: Director of Office of Nuclear Regulation
Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC