



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

PNP 2012-028

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 Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

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

**Reference:** Nuclear Regulatory Commission Order, Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, EA-12-051, dated March 12, 2012 (ADAMS Accession Number ML12054A682)

Dear Sir or Madam:

On March 12, 2012, the NRC issued an immediately effective Order in the captioned letter entitled "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately)" ("Order") to, *inter alia*, Entergy Nuclear Operations, Inc. (Entergy). The Order states 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 to take certain actions. Specifically, the NRC is requiring additional defense in depth measures to address uncertainties associated with protection from beyond design basis events. With respect to this Order, licensees are specifically directed to provide a reliable means of remotely monitoring "wide-range spent fuel pool levels" to support effective prioritization of event mitigation and recovery actions 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