



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 17, 2012

Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT – SUMMARY OF CONFERENCE CALL  
REGARDING THE SPRING 2012 STEAM GENERATOR INSPECTIONS  
(TAC NO. ME8129)

Dear Sir or Madam:

By letter dated April 5, 2012 (Agencywide Documents and Management System (ADAMS) Accession No. ML121000292), Entergy Nuclear Operations, Inc., the licensee for Palisades Nuclear Plant, submitted a notification of deviation from the Electric Power Research Institute (EPRI) Steam Generator Management Program: PWR [Pressurized Water Reactor] Steam Generator Examination Guidelines, Revision 7.

The deviation relates to the method used to size indications attributed to axially oriented outside diameter stress corrosion cracking. The deviation and the supporting justification were discussed with representatives of Palisades during conference calls on April 12 and April 20, 2012. Based on the information provided in the April 5, 2012, letter and the conference calls, the staff has the following comments concerning the deviation:

1. The April 5, 2012, letter does not appear to provide adequate justification for the deviation.
2. All data should be included in the sizing correlation unless it is excluded through application of objective data exclusion criteria (e.g., all Westinghouse data will be excluded). As a result, it may be acceptable to segregate the Combustion Engineering (CE) data from the total data set.
3. Statistical tests should be performed to justify that the CE data is statistically different than the total data set.
4. Even if the CE data set (i.e., the remaining data set after application of the data exclusion criteria) does not meet all the requirements of Appendix I of the PWR Steam Generator Examination Guidelines for sizing, it may be useful to develop a correlation to understand the uncertainties associated with the sizing method.
5. If the Westinghouse and CE data are from different statistical populations, assessment of the probability of detection for the data sets may be needed.
6. If there are not enough data points in the CE data set, a strategy for obtaining additional data could be developed which satisfies the industry guidelines for qualifying techniques. Additional confidence in the sizing methods could be obtained from the removal of tubes for destructive examination.
7. Successful performance of in-situ pressure tests on indications larger than the in-situ pressure test screening criteria does not necessarily imply that the sizing methods are conservative since the screening criteria are intended to be conservative.

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If you have any further questions or concerns, you can contact me at 301-415-8371 or [Mahesh.chawla@nrc.gov](mailto:Mahesh.chawla@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Chawla M".

Mahesh Chawla, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-255

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If you have any further questions or concerns, you can contact me at 301-415-8371 or [Mahesh.chawla@nrc.gov](mailto:Mahesh.chawla@nrc.gov).

Sincerely,

**/RA/**

Mahesh Chawla, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-255

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