

November 20, 2012

Mr. Michael Mulligan
P.O. Box 161
Hinsdale, NH 03451

Dear Mr. Mulligan:

You recently submitted two petitions addressed to Mr. William Borchardt, Executive Director for Operations at the U.S. Nuclear Regulatory Commission (NRC). The petitions were referred to the NRC's Office of Nuclear Reactor Regulation pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.206.

In your first petition dated June 18, 2012, as revised on June 27, 2012, you requested that the Palisades Nuclear Plant (Palisades) remain shutdown. In the petition, you were critical of Entergy Nuclear, the NRC, and the programmatic aspects of the regulatory program, including the Reactor Oversight Process (ROP). You focused on a leak of the Safety Injection Refueling Water (SIRW) tank at Palisades, but also discussed past events at both Palisades and other Entergy-owned facilities. Finally, you also discussed the lack of an adequate safety culture environment at Palisades.

You requested that the following actions be taken:

- (1) The shutdown resulting from the SIRW tank leak should be categorized as unplanned.
- (2) The NRC should move the Palisades performance indicator from Red to the next level V: Unacceptable Performance.
- (3) An outside authority (not the NRC's Office of the Inspector General (OIG)) should determine why the NRC did not force Palisades (Entergy) to thoroughly investigate the SIRW leak when the leak first appeared.
- (4) Top Palisades management staff should be fired and replaced before startup.
- (5) Entergy's corporate nuclear senior staff should be fired and replaced before restart.
- (6) The NRC should assign two additional NRC inspectors to Palisades and to the rest of the Entergy nuclear plants.
- (7) A local public oversight panel should be formed around every plant.
- (8) An emergency NRC senior official oversight panel should be convened to reform the ROP.

- (9) A national NRC oversight panel of outsiders (consisting of a mixture of professional and academic people, as well as lay people) should be convened to oversee and report on agency activities.
- (10) The NRC should perform an analysis to determine the cause of the numerous findings of problems with Entergy plants during this inspection reporting cycle.
- (11) The NRC should evaluate if Region III has enough personnel and resources.
- (12) Palisades should remain shutdown until all procedures are fully updated and corrected, all technical and maintenance backlogs are updated and corrected, all training completed, and all reports and safety processes are fully completed and implemented.
- (13) An independent outside investigation should review the insufficient process outcome of the 2008-2009 Palisades security falsification, investigation, safety survey local and fleet-wide training and safety surveys.
- (14) President Obama should fire Chairman Jazcko and the four Commissioners.

In the second petition dated June 28, 2012, you requested that Palisades remain shutdown. This petition was focused on roof leaks at Palisades, but also discussed past events at both Palisades and other Entergy-owned facilities. You discussed a lack of adequate safety culture environment at Palisades, and were also critical of the NRC staff for "tolerating and covering up" very serious safety problems at Palisades and throughout the Entergy organization. This petition also included specific questions related to roof leaks.

This petition duplicated many of your requests discussed in the previous petition. However, in your second petition there were new requests which are provided below:

- (15) Entergy should be prevented from starting up until all the safety problems at the site have been publicly identified and the safety culture repaired.
- (16) Heads need to roll in Region III and at headquarters for tolerating and covering up these very serious safety problems at Palisades and throughout the Entergy organization. This all has the potential to gravely damage our nation.
- (17) The NRC should report on why the 2.206 petition process failed, and for the agency to hold officials accountable to the plant employees and me with not doing their jobs in trying to understand what was going on at the site and not repairing the organization at the earliest point.
- (18) A meeting with the Palisades inspector and other inspectors to discuss the conditions of Palisades before the petition board pre-hearing.

Timeline

The NRC's Petition Review Board (PRB) met internally on July 10, and July 31, 2012, to discuss your requests for immediate action associated with the two petitions. The PRB denied the requests for immediate action on the basis that no immediate safety concern was identified that would prohibit a Palisades reactor plant startup, or had an effect on the health and safety of the public. There was no new information, or information specific enough, for the NRC to further consider making an immediate action determination. You were informed on July 17, and again on August 8, 2012, of the PRB's decision to deny your request for immediate action related to the two petitions under consideration.

On August 8, 2012, the Petition Manager contacted you to discuss the 10 CFR 2.206 process and to offer you an opportunity to address the PRB by phone or in person. You were also informed that the two petitions under consideration would be consolidated because the petitions were submitted at or about the same time; the requested actions were against the same licensee; and, with a few unique issues, addressed essentially the same specific concerns. The Petition Manager informed you that consolidation of the petitions did not reduce the importance of the circumstances being discussed, but streamlined the NRC staff's review process and response.

On August 21, 2012, you had a discussion with members of the Regional staff regarding ongoing issues at Palisades.

On August 29, 2012, you addressed the PRB via teleconference. The official transcript of the teleconference is publicly available in the Agencywide Documents Access and Management System (ADAMS) (Accession No. ML12261A380).

On September 24, 2012, the PRB met internally to review the petitions and make an initial recommendation. The PRB rejected the petition using the criteria of NRC Management Directive (MD) 8.11, "Review Process for 10 CFR 2.206 Petitions." The details of the criteria for rejection are provided in Attachment 1.

On September 27, 2012, the Petition Manager provided the PRB's initial recommendation to you and offered a second opportunity to address the PRB. On October 4, 2012, you requested an additional opportunity to address the PRB via teleconference.

On October 24, 2012, you addressed the PRB by teleconference to discuss the PRB's initial recommendation. The official transcript of the teleconference is publicly available in ADAMS (Accession No. ML12320A564).

Reactor Oversight Process

The NRC's oversight and inspection of nuclear power plants is a continuous process. The NRC staff evaluates specific violations and the safety risk that these violations present. The NRC conducts these evaluations using the ROP. The NRC staff acknowledges your dissatisfaction with the ROP and many of the final determinations resulting from the process as you discussed in the petitions and during the teleconferences with the NRC. Your concerns were forwarded to the OIG.

Palisades was in Column III (degraded cornerstone) of the ROP action matrix. As a Column III plant, the NRC conducted a supplemental inspection (using Inspection Procedure 95002), in addition to routine ongoing inspections. The inspection was completed on September 28, 2012, and was designed to address the following:

- Ensure that the root and contributing causes of the performance issue are understood.
- Identify the extent of condition and extent of cause.
- Determine if safety culture components caused or significantly contributed to the individual and collective risk-significant performance issues, including unplanned shutdowns.
- Provide assurance that corrective actions are sufficient to address the root and contributing causes and prevent recurrence.

At the start of the fourth quarter, Palisades transitioned back to Column I following the results of the supplemental inspection. The inspection identified that the licensee has appropriately addressed the Yellow and White findings.

The agency is fully aware that Palisades has had a recent number of unanticipated plant shutdowns. Based on the above actions taken by the NRC and the licensee, the agency believes that the performance deficiencies at Palisades have been identified, and that the agency has inspected these deficiencies to ensure that the licensee is taking adequate action. The NRC staff continuously verifies that plant operations are being conducted within the applicable regulatory requirements and within the terms of the operating license, and concludes that Palisades continues to remain safe to operate.

Summary

The PRB discussed the information you provided in the petitions and arrived at a consensus that you did not provide any additional information to support the petition requests during the teleconferences held on August 29 and October 24, 2012. The PRB's final determination is the same as its initial recommendation. The PRB's final determination is to reject your petition for review under the 10 CFR 2.206 process because it does not meet the criteria for review. Attachment 1 provides a summary of the details for rejecting the petitions. Attachment 2 provides a list of publicly available documents and correspondence associated with your petitions. Some issues were outside the scope of the process as described in 10 CFR 2.206, and other issues were already the subject of NRC staff review or resolution had been previously determined in accordance with NRC MD 8.11. Finally, Attachment 1 also provides additional information as to which of your concerns have been forwarded to the OIG.

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Thank you for bringing these issues to the attention of the NRC.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

Attachment 1: Table (Summary of Issues)

Attachment 2: Documents and Correspondence

Thank you for bringing these issues to the attention of the NRC.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

Attachment 1: Table (Summary of Issues)

Attachment 2: Documents and Correspondence

DISTRIBUTION: G20120443/EDATS: OEDO-2012-0364

RidsNrrDorl	RidsNrrDorlLpl3-1	RidsNrrPMPalisades	RidsNrrLABTully
RidsNrrMailCenter	RidsNrrOd	RidsEDOMailCenter	RidsOGCRp Resource
RidsOeMailCenter	RidsOiMailCenter	RidsOpaMail	RidsRgn3MailCenter
RidsOcaMailCenter	PUBLIC	LPL3-1 R/F	
MBanic, NRR	JGiessner, RIII	JLennartz, RIII	
TBeltz, NRR	CHair, OGC	RLerch, R3	

Package: ML12321A017

Incoming: ML12177A278 (G20120443/OEDO-2012-0364)

ML12180A336 (G20120443)

ML12262A355 (G20120443)

Transcript: ML12261A380

ML12320A564

Response: ML12320A608

* concurrence via email

OFFICE	LPL3-1/PM	LPL3-1/LA	DPR/PM	R3/DRP/BC	LPL3-1/BC	OGC	NRR/DD
NAME	TBeltz	SFiguroa * for BTully	MBanic *	JLennartz * for JGiessner	RCarlson	CHair * (NLO)	MEvans
DATE	11/16/12	11/16/12	11/16/12	11/16/12	11/19/12	11/16/12	11/20/12

OFFICIAL RECORD COPY

Attachment 1

Table (Summary of Issues)

Item(s)	Specific Issue Raised	Is This Request Outside the Scope of the 2.206 Process?	Does This Meet the Criteria for Review?	Does This Meet the Criteria for Rejection?
(1)	The Safety Injection Refueling Water tank shutdown be categorized as an unplanned shutdown	Yes	No. The petitioner does not provide adequate basis and sufficient facts to warrant further inquiry and, therefore, this request should not be accepted for review pursuant to 10 CFR 2.206. All the specific issues raised in the support of the requested action have been the subject of NRC staff review and evaluation. Therefore, this request meets the criteria for rejection as discussed in MD 8.11.	Yes
(2)	The NRC should move the Palisades performance indicator from Red to Level V [Column 5]: Unacceptable Performance	Yes	No. The petitioner does not provide adequate basis and sufficient facts to warrant further inquiry and, therefore, this request should not be accepted for review pursuant to 10 CFR 2.206. The NRC staff evaluates licensee performance and placement within the Action Matrix under the Reactor Oversight Process. Therefore, this request meets the criteria for rejection as discussed in MD 8.11.	Yes
(3)	An outside authority investigate why the NRC did not make Palisades Entergy thoroughly investigate the SIRW leak when it first appeared and ensure it was fixed during the last shutdown period	Yes	No. The petitioner does not provide adequate basis and sufficient facts to warrant further inquiry and, therefore, this request should not be accepted for review pursuant to 10 CFR 2.206. All the specific issues raised in the support of the requested action have been the subject of NRC staff review and evaluation. Therefore, this request meets the criteria for rejection as discussed in MD 8.11. This issue was referred to the Office of the Inspector General (OIG).	Yes

<i>Item(s)</i>	<i>Specific Issue Raised</i>	<i>Is This Request Outside the Scope of the 2.206 Process?</i>	<i>Does This Meet the Criteria for Review?</i>	<i>Does This Meet the Criteria for Rejection?</i>
(4)	Top Palisades management staff should be fired and replaced before startup.	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>The petitioner's supporting facts are insufficient to warrant further inquiry.</p> <p>This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (Attachment 2, "Documents and Correspondence," Items 2 and 3)..</p> <p>Therefore, this request meets the criteria for rejection as discussed in MD 8.11.</p>	Yes
(5)	Entergy corporate nuclear staff should be fired and replaced prior to Palisades restart.	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>The petitioner's supporting facts are insufficient to warrant further inquiry.</p> <p>This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (Attachment 2, "Documents and Correspondence," Items 2 and 3).</p> <p>Therefore, this request meets the criteria for rejection as discussed in MD 8.11.</p>	Yes
(6)	The NRC should assign two additional NRC inspectors at Palisades, and to all the other troubled Entergy plants.	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (G20110127 and G20120022)</p> <p>Therefore, this request meets the criteria for rejection as discussed in MD 8.11.</p>	Yes

<i>Item(s)</i>	<i>Specific Issue Raised</i>	<i>Is This Request Outside the Scope of the 2.206 Process?</i>	<i>Does This Meet the Criteria for Review?</i>	<i>Does This Meet the Criteria for Rejection?</i>
(7)	Formation of a local public oversight panel around every plant.	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (Attachment 2, "Documents and Correspondence," Items 2 and 3).</p> <p>Therefore, this request meets the criteria for rejection as discussed in MD 8.11.</p>	Yes
(8)	An emergency NRC senior official oversight panel should be convened to reform the Reactor Oversight Process.	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (Documents and Correspondence Items 2 and 3).</p> <p>Therefore, this request meets the criteria for rejection as discussed in MD 8.11.</p> <p>This issue was referred to the Office of the Inspector General (OIG).</p>	Yes
(9)	A national NRC oversight panel should be convened to oversee and report on agency activities.	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (Attachment 2, "Documents and Correspondence," Items 2 and 3).</p> <p>Therefore, this request meets the criteria for rejection as discussed in MD 8.11.</p>	Yes

Item(s)	Specific Issue Raised	Is This Request Outside the Scope of the 2.206 Process?	Does This Meet the Criteria for Review?	Does This Meet the Criteria for Rejection?
(10)	The NRC should perform an analysis to determine the cause of the numerous findings of problems with Entergy plants during this inspection reporting cycle.	Yes	No. The Petitioner refers to findings that are indicative of recurring problems at Palisades and Entergy plants. However, the information discussed in the petition does not appear to provide additional facts beyond what the NRC staff has already reviewed and documented. The issues raised in the support of the requested action have been the subject of NRC staff review and evaluation. Therefore, this request meets the criteria for rejection as discussed in MD 8.11.	Yes
(11)	The NRC should evaluate if Region III has enough personnel and resources.	Yes	No. This is not an enforcement-related action and is outside the scope of the 2.206 process and, therefore, this request should not be accepted for review pursuant to 10 CFR 2.206. This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (Attachment 2, "Documents and Correspondence," Items 2 and 3). Therefore, this request meets the criteria for rejection as discussed in MD 8.11.	Yes
(12)	Palisades should remain shutdown until procedures are fully updated and corrected; all technical and maintenance backlogs are updated and corrected; all training is completed; all reports and safety processes fully completed and implemented.	No	No. The issues raised in the support of the requested action are subject to continuing NRC staff review and evaluation via the Reactor Oversight Process. The petitioner does not provide adequate basis and sufficient facts to warrant further inquiry. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.	Yes

Item(s)	Specific Issue Raised	Is This Request Outside the Scope of the 2.206 Process?	Does This Meet the Criteria for Review?	Does This Meet the Criteria for Rejection?
(13)	Request independent outside investigation of the 2008-2009 Palisades security falsification, investigation, safety survey and local and fleet-wide training and safety surveys. It appears that the safety culture at Palisades has been grossly defective and ineffectively for many years, along with the ROP.	Yes	No. The petitioner does not provide adequate basis and sufficient facts to warrant further inquiry and, therefore, this request should not be accepted for review pursuant to 10 CFR 2.206. This request was reviewed by the NRC in accordance with the 2.206 process as discussed in a previous petition filed by Mr. Mulligan (Attachment 2, "Documents and Correspondence," Item 3). All the specific issues raised in the support of the requested action have been the subject of NRC staff review and evaluation. Therefore, this request meets the criteria for rejection as discussed in MD 8.11. This issue was referred to the Office of the Inspector General (OIG).	Yes
(14)	Replacement of NRC Chairman and Commissioners	Yes	No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206. The members of the Commission are Presidential appointees. This request was reviewed by the NRC in accordance with the 2.206 process for previous petitions filed by Mr. Mulligan (Documents and Correspondence Items 2 and 3). Therefore, this request meets the criteria for rejection as discussed in MD 8.11.	Yes

<i>Item(s)</i>	<i>Specific Issue Raised</i>	<i>Is This Request Outside the Scope of the 2.206 Process?</i>	<i>Does This Meet the Criteria for Review?</i>	<i>Does This Meet the Criteria for Rejection?</i>
(15)	<p>Entergy should be prevented from starting up until all the safety problems at the site have been publicly identified and the safety culture repaired.</p>	No	<p>No. The petitioner does not provide adequate basis and sufficient facts to warrant further inquiry and, therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>All the specific issues raised in the support of the requested action have been the subject of NRC staff review and evaluation, which meets the criteria for rejection as discussed in MD 8.11.</p> <p>Refer to Attachment 2, "Documents and Correspondence," Items 5, 6, 8, 9, 11, 12, 14, 17, 18, 19, and 20.</p> <p>This issue was referred to the Office of the Inspector General (OIG).</p>	Yes
(16)	<p>Heads need to roll in Region III and Headquarters for tolerating and covering up these very serious safety problems at Palisades and throughout the Entergy organization.</p>	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p>	Yes

Item(s)	Specific Issue Raised	Is This Request Outside the Scope of the 2.206 Process?	Does This Meet the Criteria for Review?	Does This Meet the Criteria for Rejection?
(17)	<p>Report on why the 2.206 petition process failed so utterly for us... for the agency to hold officials accountable to the plant employees and me with not doing their jobs in trying to understand what was going on at the site and not repairing the organization at the earliest point. The whole Entergy organization is involved and they have a huge costly hole to dig out of. It is easier digging the hole than crawling out of one.</p>	Yes	<p>No. This is not an enforcement-related action and is outside the scope of the 2.206 process. Therefore, this request should not be accepted for review pursuant to 10 CFR 2.206.</p> <p>This issue was referred to the Office of the Inspector General (OIG).</p>	Yes
(18)	Request a meeting with the Palisades inspectors and other inspectors to discuss the conditions of Palisades before the PRB pre-hearing.	N/A	On August 21, 2012, the Petitioner had a phone call with members of the Regional staff to discuss ongoing issues at Palisades.	Yes

Attachment 2

DOCUMENTS AND CORRESPONDENCE

1. Letter dated January 10, 2012, from Mike Mulligan to R. William Borchardt re: 10 CFR 2.206 Petition (G20120022/EDATS: OEDO-2012-0028) Associated with a Request for Emergency Palisades Shutdown (ADAMS Accession No. ML12012A212).
2. Closure letter dated April 20, 2011, from Thomas Blount to Mr. Michael Mulligan re: Palisades 2.206 Petition (G20110127/EDATS: OEDO-2011-0156) Associated with a Request for Immediate Shutdown of Palisades and Other Entergy Plants (ADAMS Accession No. ML111010414).
3. Closure letter dated May 21, 2012, from Michael Cheok to Mr. Michael Mulligan re: Palisades 2.206 Petition (G20120022/EDATS: OEDO-2012-0028) Associated with a Request for Emergency Palisades Shutdown (ADAMS Accession No. ML111010487).
4. Letters dated June 18, 2012, and June 27, 2012 (Rev. 1), from Mike Mulligan to R. William Borchardt re: 10 CFR 2.206 Petition Associated with a Request for Emergency Palisades Shutdown (ADAMS Accession No. ML12177A278 and ML12180A336).
5. Letter dated June 22, 2012, from Representative Edward J. Markey to Chairman Jaczko re: Shutdown of Palisades Nuclear Power Plant - Leak in Water Storage Tank (ADAMS Accession No. ML12178A446).
6. Letter dated June 26, 2012, from Gary L. Shear to Anthony Vitale re: Request for Information on Safety Culture Issues at Palisades Nuclear Plant (ADAMS Accession No. ML12179A155).
7. Letter dated June 28, 2012, from Mike Mulligan to R. William Borchardt re: 10 CFR 2.206 Petition Associated with Palisades Numerous Roof Leaks (ADAMS Accession No. ML12262A355).
8. Letter dated July 12, 2012, from Anthony J. Vitale to U.S. NRC Document Control Desk re: Safety Injection Refueling Water Tank Leakage and Corrective Actions (ADAMS Accession No. ML12194A573).
9. Confirmatory Action Letter dated July 17, 2012, from Charles A. Casto to Anthony Vitale re: Palisades Nuclear Plant Commitment to Address Safety Injection Refueling Water Tank and Control Room Concrete Support Structure Leakage (ADAMS Accession No. ML12199A409).
10. Closure letter dated July 29, 2012, from Allen Howe to Thomas Saporito re: 10 CFR 2.206 Petition (G20120149/EDATS: OEDO-2012-0127) Associated with the Palisades Nuclear Plant (ADAMS Accession No. ML12173A481).

11. Letter dated July 31, 2012, from John B. Giessner to Anthony J. Vitale re: NRC Supplemental Inspection Report 05000255/2012010, and Assessment Follow-up Letter (ADAMS Accession No. ML12213A225).
12. Letter dated August 8, 2012, from John B. Giessner to Anthony J. Vitale re: Palisades Nuclear Plant Integrated Inspection Report 05000255/2012003 (ADAMS Accession No. ML12221A340).
13. Letter dated August 15, 2012, from Chairman Macfarlane to Representative Edward J. Markey re: Response to Specific Requests for Information Regarding the Recent Shutdown of the Palisades Nuclear Plant Resulting from a Leak in a Water Storage Tank (ADAMS Accession Package No. ML12191A401).
14. Letter dated August 30, 2012, from John B. Giessner to Anthony J. Vitale re: Notification of NRC Supplemental Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area and Request for Information (ADAMS Accession No. ML12243A409).
15. Transcript from August 29, 2012, Teleconference re: 10 CFR 2.206 Petitions Submitted by Mike Mulligan Related to the Palisades Nuclear Plant (ADAMS Accession No. ML12261A380).
16. Transcript from October 24, 2012, Teleconference re: 10 CFR 2.206 Petition Submitted by Mike Mulligan Related to the Palisades Nuclear Plant (ADAMS Accession No. ML12320A564).
17. Letter dated October 24, 2012, from Stephanie Coffin to Ms. Bette Pierman, et. al., re: Palisades Continued Safety Issues 2012 (ADAMS Accession No. ML12275A151).
18. Memorandum dated November 8, 2012, Request for Deviation to the Reactor Oversight Process Action Matrix to Provide Heightened NRC Oversight at the Palisades Nuclear Plant (ADAMS Accession No. ML12306A367).
19. Letter dated November 9, 2012, from Kenneth O'Brien to Anthony J. Vitale re: NRC Supplemental Inspection Report 05000255/2012011; and Assessment Follow-Up Letter (ADAMS Accession No. ML12314A304).
20. Letter dated November 13, 2012, from John B. Giessner to Anthony J. Vitale re: Palisades Nuclear Plant Integrated Inspection Report 05000255/2012004 (ADAMS Accession No. ML12319A093).