



Entergy Nuclear Operations, Inc.
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PNP 2012-108

December 11, 2012

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

SUBJECT: Change of Commitment in Submittal for Relief Request - Proposed Alternative - Use of Alternate ASME Code Case N-770-1 Baseline Examination (TAC No. ME8492)

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

- References:
1. Entergy Nuclear Operations, Inc. letter, PNP 2012-035, *Relief Request - Proposed Alternative - Use of Alternate ASME Code Case N-770-1 Baseline Examination, dated April 26, 2012* (ADAMS Accession Number ML12118A144)
 2. NRC letter, *Palisades – One-Time Relief from Certain Requirements of the ASME Code Case N-770-1 for the Fourth 10-Year Inservice Inspection Interval (TAC No. ME8492)*, (ADAMS Accession Number ML12258A352)

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(a)(3)(ii), Entergy Nuclear Operations, Inc. (Entergy) requested NRC approval of a Request for Relief for a Proposed Alternative for the Palisades Nuclear Plant (PNP)(Reference 1). The request for relief was associated with the use of an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Code Case N-770-1, as conditioned by 10 CFR 50.55a(g)(6)(ii)(F)(3), dated June 21, 2011.

The Entergy request for relief included a commitment to perform appropriate actions to meet ASME Section XI Code Case N-770-1 baseline examinations for those dissimilar metal welds not meeting the coverage requirements during the 2012 refueling outage. These actions consisted of:

- 1) compliance with N-770-1 requirements, or
- 2) removal of the subject locations from the scope of ASME Section XI Code Case N-770-1, or
- 3) submittal of relief request in accordance with the applicable provisions of 10 CFR 50.55a.

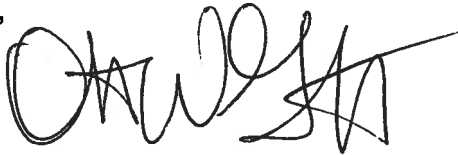
The scheduled completion date for the actions was prior to startup from the planned fall 2013 refueling outage.

The request for relief was approved in a NRC letter dated September 26, 2012 (Reference 2). The letter stated that the NRC does not consider the third option, concerning submittal of a relief request, to be an appropriate means to meet the examination coverage requirements of 10 CFR 50.55a(a)(3)(ii). The NRC requested that Entergy change the commitment by deleting the third option.

This Entergy letter changes the commitment to delete the third option, as requested by the NRC. The changed commitment is shown in Attachment 1.

This letter contains no new commitments and makes one change to an existing commitment.

Sincerely,

A handwritten signature in black ink, appearing to be 'OWG/jse', written over a horizontal line.

owg/jse

Attachment: 1. Description of Commitment

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

ATTACHMENT 1

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DESCRIPTION OF COMMITMENT

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for information only and are not commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
<p>Entergy will perform appropriate actions to meet ASME Section XI Code Case N-770-1 baseline examinations for those dissimilar metal welds not meeting the examination coverage requirements during the 2012 refueling outage prior to startup from the planned fall 2013 refueling outage. These actions include:</p> <p>1) compliance with N-770-1 requirements, or</p> <p>2) removal of the subject locations from the of scope ASME Section XI Code Case N-770-1.</p>	✓		Prior to startup from the planned fall 2013 refueling outage.