

## Chen, Qiao-Lynn

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**From:** Chawla, Mahesh  
**Sent:** Wednesday, March 13, 2013 6:54 PM  
**To:** Smith, Keith E; Hazelhoff, Amy C; GUSTAFSON, OTTO W  
**Cc:** Klein, Alex; Harrison, Donnie; Carlson, Robert; Lain, Paul; Wengert, Thomas; Fields, Leslie; Robinson, Jay; Gallucci, Ray; ONeal, Daniel; Barrett, Harold  
**Subject:** LIC-109 Acceptance Review - Palisades NFPA 805 LAR - MF0382

By letter dated December 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12349A455, as supplemented by letter dated February 22, 2013, Entergy Nuclear Operations, Inc. (ENO)(the licensee) submitted a license amendment request for Palisades Nuclear Plant (PNP), to adopt National Fire Protection Association Standard NFPA-805, "Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants," 2001.

The proposed amendment requests U.S. Nuclear Regulatory Commission (NRC) review and approval for adoption of a new fire protection licensing basis which complies with the requirements in Sections 50.48(a) and 50.48(c) of Title 10 of the *Code of Federal Regulations* (10 CFR), and the guidance in Regulatory Guide 1.205, Revision 1, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," December 2009 (ADAMS Accession No. ML092730314). The purpose of this letter is to provide the results of the NRC staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with 10 CFR 50.90, an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there are instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

On February 22, 2013 Palisades (the licensee) provided additional information to supplement their NFPA 805 application. In a conference call on March 11, 2013, the licensee clarified the information in their supplement to avoid ambiguity in the intent of the information. Specifically, the licensee stated that the peer review team did complete the review of the items presented in Table 3, "Supporting Requirements with Status of Not Reviewed." Much of the information in this table is from the initial peer review and the intent of the disposition column discussion was to convey that the peer review team had reviewed these items by their final peer review. The licensee stated that the items presented in Table 2, "Supplemental Information to Table V-1" that are identified as being "open" are not issues for the application, but are left as "open" for planned future activities to support developing and implementing procedures associated with the NFPA 805 application. In this regard, the licensee stated that the application is relying upon screening values in their fire PRA human reliability analysis (HRA). As a result, a number of peer review findings in various fire PRA elements are identified as remaining open. The impact on the application from the use of screening values in the fire PRA HRA will be a significant area of review, including its impact on the risk of recovery actions and the risk credit

for modifications. Depending on the outcome of this aspect of the review, the licensee may be requested to perform the detailed fire PRA HRA, perform the associated focus-scope peer review of such a model upgrade, and revise the application to address any peer review findings and risk results. This would likely extend the current expected schedule for the staff review and might result in a delay of the site audit or result in additional site audits.

If you have any questions, please contact me at (301) 415-8371.

Sincerely,

Mahesh Chawla, Project Manager  
Plant Licensing Branch 3-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation