



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

June 18, 2013

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

**SUBJECT: PALISADES NUCLEAR PLANT - NOTIFICATION OF NRC INSPECTION AND
REQUEST FOR INFORMATION**

Dear Mr. Vitale:

On December 16, 2013, the U.S. Nuclear Regulatory Commission (NRC) will begin the Temporary Instruction (TI) inspection, "Review of Implementation of the Industry Initiative to Control Degradation of Underground Piping and Tanks," (TI 2515-182) at your Palisades Nuclear Plant. This on-site inspection is scheduled to be performed December 16 through December 20, 2013.

In order to minimize the impact to your on-site resources and to ensure a productive inspection for both sides, we have enclosed a list of documents pertinent to our inspection. The documents that are requested for this inspection include all relevant documents that will allow the inspector(s) to adequately complete Phase II of this inspection. It is important that all of these documents are up-to-date and complete, in order to minimize the number of additional documents requested during the preparation and/or the on-site portions of the inspection.

We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Ms. B. Dotson, of your organization. If there are any questions about this inspection or the material requested, please contact the Lead Inspector, Mr. M. Holmberg at (630) 829-9748.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011. The NRC may not conduct or sponsor and a person is not required to respond to a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

A. Vitale

-2-

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

David E. Hills, Chief
Engineering Branch 1
Division of Reactor Safety

Docket No. 50-255
License No. DPR-20

Enclosure: Document Request for Temporary Instruction (TI 2515-182) Inspection

cc w/encl: Distribution via ListServ™

TEMPORARY INSTRUCTION 2515-182 PHASE II INSPECTION DOCUMENT REQUEST

Inspection Dates: December 16 – 20, 2013

Inspection Procedures: Temporary Instruction (TI 2515-182), “Review of Implementation of the Industry Initiative to Control Degradation of Underground Piping and Tanks”

Inspector: M. Holmberg
(630) 829-9748
mel.holmberg@nrc.gov

A. Information Requested for the In-Office Preparation Week

The following documents listed below are requested (electronic copy CD-ROM, if possible) by November 27, 2013, to facilitate the preparation for the on-site inspection week. The inspector may select specific items from the information requested for the preparation week and request follow-up documents during the on-site inspection week.

1. Organization list of site individuals responsible for the site’s Underground Piping and Tanks Program.
2. Copy of Site Underground Piping and Tanks Program.
3. Please review the enclosure “Questions” list and provide the response and/or document requests. The questions identified with the word “**Prep**” (highlighted in bold) are the items to be provided in advance of the inspection to support preparation for on-site week.
4. Schedule for completion of the following NEI 09-14 Revision 1 attributes:

Buried Piping

- Procedures and Oversight;
- Risk-Ranking;
- Inspection Plan;
- Plan Implementation; and
- Asset Management Plan.

Underground Piping and Tanks

- Procedures and Oversight;
- Prioritization;
- Condition Assessment Plan;

TEMPORARY INSTRUCTION 2515-182 PHASE II INSPECTION DOCUMENT REQUEST

- Plan Implementation; and
 - Asset Management Plan.
5. Documents which provide resolution to the potential deviations from NEI 09 14 "Guideline for the Management of Buried Piping Integrity," identified by the NRC as Unresolved Item (URI) 05000255/2012005.04.

B. Information to be Provided On-Site to the Inspectors Following the Entrance Meeting

1. Location maps of buried and underground piping and tanks identified by the inspector from the information requested for the preparation week.
2. Copy of EPRI document, "Recommendations for an Effective Program to Control the Degradation of Buried Pipe."
3. Self or third party assessments of the Underground Piping and Tanks Program (if any have been performed).
4. Please review the enclosure "Questions" list and provide response and/or document requests. The questions identified with the word "**On-Site**" (highlighted in bold) are the items to be provided to the inspector on-site at the entrance meeting.
5. For any of the NEI 09-14 Revision 1 attributes identified below which have been completed prior to the NRC's on-site inspection, provide written records that demonstrate that the program attribute is complete.

Buried Piping

- Procedures and Oversight;
- Risk-Ranking;
- Inspection Plan;
- Plan Implementation; and
- Asset Management Plan.

Underground Piping and Tanks

- Procedures and Oversight;
- Prioritization;
- Condition Assessment Plan;
- Plan Implementation; and
- Asset Management Plan.

TEMPORARY INSTRUCTION 2515-182 PHASE II INSPECTION DOCUMENT REQUEST

	Questions	Response
Prep week/ On-site week	Initiative Consistency	
Prep	Has the licensee taken any deviations to either of the initiatives?	Yes/No
On-site	If so, what deviations have been taken and what is (are) the basis for these deviations?	Provide documentation of deviations and any associated corrective action reports.
Prep	Does the licensee have an on-site buried piping program manager (owner) and, potentially, a staff?	Yes/No
On-site	How many buried piping program owners have there been since January 1, 2010?	Provide documentation identifying individuals responsible for the site buried piping program since January 1, 2010.
On-site	How many other site programs are assigned to the buried piping program owner?	List all site programs that are under the direct responsibility of the site's buried piping program owner.
On-site	Does the licensee have requirements to capture program performance, such as system health reports and performance indicators?	Yes/No Provide copies of most recent systems health reports, if applicable.
Prep	Are these requirements periodic or event driven?	Periodic/Event Driven/None
On-site	Are there examples where these requirements have been successfully used to upgrade piping systems or to avert piping or tank leaks?	Yes/No Provide documentation related to examples, if applicable.
Prep	Does the licensee have a program or procedure to confirm that as-built location of buried and underground piping and tanks at the plant?	Yes/No

TEMPORARY INSTRUCTION 2515-182 PHASE II INSPECTION DOCUMENT REQUEST

Prep	Has the licensee used this program?	Yes/No
Prep/ On-site	For a sample of buried pipe and underground piping and tanks (sample size at least 1 high and 1 low risk/priority pipe or tank), did the risk ranking and/or prioritization process utilized by the licensee produce results in accordance with the initiative guidelines, i.e., which emphasize the importance of components which have a high likelihood and consequence of failure and deemphasize the importance of components which have a low likelihood and consequence of failure?	<p>Yes/No Sample size examined _____</p> <p>Prep: Provide copy of site's risk ranking documents including documents pertaining to the actual risk rankings and methodology used.</p> <p>Prep: Provide documents/drawings and/or list which identifies the risk ranking for each pipe segment or tank in each system within the scope of these programs.</p> <p>On-site: Provide the documents which record/describe how the risk-methodology was applied to determine the risk of pipe segments or tanks as selected by the inspector during the preparation week.</p>
Prep	As part of its risk-ranking process did the licensee estimate/determine the total length of buried/underground piping included in the initiatives?	Yes/No
Prep	As part of its risk-ranking process did the licensee estimate/determine the total length of high risk buried/underground piping included in the initiatives?	Yes/No
	Preventive Actions/System Maintenance	
Prep	For buried steel, copper, or aluminum piping or tanks which are not cathodically protected, has the licensee developed a technical basis for concluding that structural (e.g., ASME Code minimum wall, if applicable) and leak-tight integrity of buried piping can be maintained?	Yes/No/Not Applicable (no buried steel, copper, or aluminum piping which is not cathodically protected)

TEMPORARY INSTRUCTION 2515-182 PHASE II INSPECTION DOCUMENT REQUEST

On-site	Is the technical basis provided as justification by the licensee consistent with the initiative (including its reference documents) or industry standards (e.g., NACE SP0169)	Yes/No Provide documented technical basis including referencing documents.
Prep	For uncoated steel piping, has the licensee developed a technical basis for concluding that structural (e.g., ASME Code minimum wall, if applicable) and leak-tight integrity of buried piping can be maintained?	Yes/No/Not Applicable (no uncoated buried steel pipe)
On-site	Is the technical basis provided as justification by the licensee consistent with the initiative (including its reference documents) or industry standards (e.g., NACE SP0169)?	Yes/No Provide documented technical basis including referencing documents.
Prep	For licensees with cathodic protection systems, does the licensee have procedures for the maintenance, monitoring and surveys of this equipment?	Yes/No/Not Applicable (no cathodic protection systems)
On-site	Are the licensee procedures consistent with the initiative (including its reference documents) or industry standards (e.g., NACE SP0169)?	Yes/No Provide copy of procedures, if applicable.
On-site	Is the cathodic protection system, including the evaluation of test data, being operated and maintained by personnel knowledgeable of, or trained in, such activities?	Yes/No Provide documentation of training or qualification records of personnel.

TEMPORARY INSTRUCTION 2515-182 PHASE II INSPECTION DOCUMENT REQUEST

On-site	Is there a program to ensure chase and vault areas which contain piping or tanks subject to the underground piping and tanks initiative are monitored for, or protected against, accumulation of leakage from these pipes or tanks?	Yes/No/N/A (No piping in chases or vaults) Provide copy of program.
	Inspection Activities/Corrective Actions	
Prep	Has the licensee prepared an inspection plan for its buried piping and underground piping and tanks?	Yes/No
On-site	Does the plan specify dates and locations where inspections are planned?	Yes/No Provide copy of inspection plan and associated implementation procedures.
Prep	Have inspections, for which the planned dates have passed, occurred as scheduled or have a substantial number of inspections been deferred?	Occurred as scheduled/Deferred
Prep	Has the licensee experienced leaks and/or significant degradation in safety-related piping or piping carrying licensed material since January 1, 2009?	Leaks Yes/No Degradation Yes/No
Prep	If leakage or significant degradation did occur, did the licensee determine the cause of the leakage or degradation? Based on a review of a sample of root cause analyses for leaks from buried piping or underground piping and tanks which are safety-related or contain licensed material, did the licensee's corrective action taken as a result of the incident include addressing the cause of the degradation?	Yes/No Yes/No/N/A (no leaks) Provide root cause analyses of identified leaks, if applicable.
On-site		

TEMPORARY INSTRUCTION 2515-182 PHASE II INSPECTION DOCUMENT REQUEST

On-site	Did the corrective action include an evaluation of extent of condition of the piping or tanks and possible expansion of scope of inspections? (Preference should be given to high risk piping and "significant" leaks where more information is likely to be available).	Yes/No/N/A (no leaks) Provide corrective action documents concerning leaks, if applicable.
Prep	Based on a review of a sample of NDE activities which were either directly observed or for which records were reviewed, were the inspections conducted using a predetermined set of licensee/contractor procedures?	Yes/No Provide list of scheduled NDE activities scheduled during on-site week and list of NDE activities that have already been conducted.
On-site	Were these procedures sufficiently described and recorded such that the inspection could be reproduced at a later date?	Yes/No Provide copies of NDE procedures for the various NDE activities that have occurred or are scheduled to occur.
Prep	Were the procedures appropriate to detect the targeted degradation mechanism?	Yes/No
Prep	For quantitative inspections, were the procedures used adequate to collect quantitative information?	Yes/No
On-site	Did the licensee disposition direct or indirect NDE results in accordance with their procedural requirements?	Yes/No Provide sample of direct and/or indirect NDE results and the subsequent evaluations of these NDE results.
Onsite	Based on a sample of piping segments, is there evidence that licensees are substantially meeting the pressure testing requirements of ASME Section XI IWA-5244?	Yes/No Provide the completed records for the last two required Section XI periodic pressure/flow test on safety-related buried pipe segments.

A. Vitale

-2-

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

David E. Hills, Chief
Engineering Branch 1
Division of Reactor Safety

Docket No. 50-255
License No. DPR-20

Enclosure: Document Request for Temporary Instruction (TI 2515-182) Inspection

cc w/encl: Distribution via ListServ™

DISTRIBUTION:

Doug Huyck
RidsNrrPMPalisades Resource
RidsNrrDorLpl3-1 Resource
RidsNrrDirslrib Resource
Chuck Casto
Cynthia Pederson
Steven Orth
Allan Barker
Carole Ariano
Linda Linn
DRPIII
DRSIII
Patricia Buckley
Tammy Tomczak

DOCUMENT NAME: G:\DRSIII\DRS\Work in Progress\Ltr 6 13 Palisades Phase 2 RFI
MSH.docx

Publicly Available Non-Publicly Available Sensitive Non-Sensitive
To receive a copy of this document, indicate in the concurrence box "C" = Copy without attach/encl "E" = Copy with attach/encl "N" = No copy

OFFICE	RIII		RIII				
NAME	MHolmberg:ls		DHills				
DATE	6/17/13		6/18/13				

OFFICIAL RECORD COPY