Entergy

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Tel 269 764 2000

Anthony J Vitale
Site Vice President

PNP 2014-111

December 18, 2014

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

SUBJECT: Revised License Condition – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors

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

References:

1. ENO letter, PNP 2012-106, "License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors," dated December 12, 2012 (ADAMS Accession Number ML12348A455)

2. ENO letter, PNP 2013-013, "Response to Clarification Request — License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors," dated February 21, 2013 (ADAMS Accession Number ML13079A090)

3. NRC electronic mail of August 8, 2013, "Palisades - Requests for Additional Information Regarding Transition to the Fire Protection Program to NFPA Standard 805 (TAC No. MF0382)" (ADAMS Accession Number ML13220B131)

4. ENO letter, PNP 2013-075, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated September 30, 2013 (ADAMS Accession Number ML13273A469)

5. ENO letter, PNP 2013-079, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water

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Reactors", dated October 24, 2013 (ADAMS Accession Number ML13298A044)

6. ENO letter, PNP 2013-083, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated December 2, 2013 (ADAMS Accession Number ML13336A649)

7. NRC electronic mail of March 11, 2014, "Requests for Additional Information – Palisades – NFPA 805 Project LAR - MF0382" (ADAMS Accession Number ML14118A293)

8. ENO letter, PNP 2014-035, "Revised Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated April 2, 2014 (ADAMS Accession Number ML14092A126)

9. ENO letter, PNP 2014-050, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated May 7, 2014 (ADAMS Accession Number ML14127A152)

10. NRC electronic mail of May 21, 2014, "Requests for Additional Information – PRA - Palisades – NFPA 805 LAR - MF0382" (ADAMS Accession Number ML14142A104)

11. ENO letter, PNP 2014-063, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated June 17, 2014 (ADAMS Accession Number ML14169A046)

12. ENO letter, PNP 2014-080, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated August 14, 2014 (ADAMS Accession No. ML14226A498)

13. NRC electronic mail of October 21, 2014, "Palisades: NFPA 805 Clarifying Questions" (ADMAS Accession Number ML14296A478)

14. ENO letter, PNP 2014-097, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805

Performanced-Based Standard for Fire Protection for Light Water Reactors", dated November 4, 2014 (ADAMS Accession No. ML14308A247)

15. NRC electronic mail of December 8, 2014, "Palisades Nuclear Plant – NFPA 805 LAR revised license condition necessitates updated Enclosures 2 and 3 to Original LAR"

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request to adopt the NFPA 805 performance-based standard for fire protection for light water reactors. In Reference 2, ENO responded to a clarification request. In Reference 3, ENO received electronic mail Request for Additional Information (RAIs). In Reference 4, ENO submitted the 60-day RAI responses. In Reference 5, ENO submitted the revised 90-day RAI responses. In Reference 6, ENO submitted the 120-day RAI responses. In Reference 7, ENO received electronic mail RAIs on Fire Modeling. In Reference 8, ENO submitted the revised response to RAI SSA 07. In Reference 9, ENO submitted responses to the Fire Modeling RAIs. In Reference 10, ENO received electronic mail RAIs on Fire Probabilistic Risk Assessment (PRA). In Reference 11, ENO submitted responses to the round 2 PRA 30-day RAIs. In Reference 12, ENO submitted responses to the round 2 PRA 90-day RAIs. In Reference 13, ENO received electronic mail RAIs on Fire PRA. In Reference 14, ENO submitted responses to requests for additional information. In Reference 15, ENO received an electronic mail request to submit the revised License Condition for the NFPA 805 LAR.

In Attachment 1 to this letter, ENO is providing a revised Enclosure 2 to the original LAR as submitted in Reference 1. This Enclosure 2 supercedes the Enclosure 2 that was submitted in Reference 1.

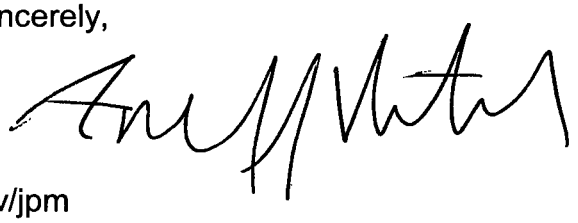
In Attachment 2 to this letter, ENO is providing a revised Enclosure 3 to the original LAR as submitted in Reference 1. This Enclosure 3 supercedes the Enclosure 3 that was submitted in Reference 1.

A copy of this response has been provided to the designated representative of the State of Michigan.

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 18, 2014.

Sincerely,



ajv/jpm

Attachments:

1. Revised Enclosure 2 to Original LAR (PNP 2012-106) - Proposed Renewed Operating License and Technical Specification Changes (Mark-up)
2. Revised Enclosure 3 to Original LAR (PNP 2012-106) – Renewed Operating License and Technical Specification Changes (Clean)

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

ATTACHMENT 1

Proposed Renewed Operating License and Technical Specification Changes (Mark-up)

11 Pages Follow

Revised Enclosure 2 to Original LAR (PNP 2012-106)

(1) Pursuant to Section 104b of the Act, as amended, and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," (a) ENP to possess and use, and (b) ENO to possess, use and operate, the facility as a utilization facility at the designated location in Van Buren County, Michigan, in accordance with the procedures and limitation set forth in this license;

(2) ENO, pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use source and special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Updated Final Safety Analysis Report, as supplemented and amended;

(3) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use byproduct, source, and special nuclear material as sealed sources for reactor startup, reactor instrumentation, radiation monitoring equipment calibration, and fission detectors in amounts as required;

(4) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material for sample analysis or instrument calibration, or associated with radioactive apparatus or components; and

(5) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operations of the facility.

C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) ENO is authorized to operate the facility at steady-state reactor core power levels not in excess of 2565.4 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) The Technical Specifications contained in Appendix A, as revised through Amendment No. ~~252~~ xxx, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. ENO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) ~~ENO shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SERs dated 09/01/78, 03/19/80, 02/10/81, 05/26/83, 07/12/85, 01/29/86, 12/03/87, and 05/19/89 and subject to the following provisions:~~

Replace 2.C.(3) with Insert A

a. ENO may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

b. ENO may alter specific features of the approved fire protection program provided:

- Such changes do not result in failure to complete the fire protection program as approved by the Commission. ENO shall maintain in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program and shall make such records available to the Commission Inspectors upon request. All changes to the approved program shall be reported along with the FSAR revision as required by 10 CFR 50.71(e); and

- Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.

(4) Performance of Technical Specifications Surveillance Requirement SR 3.1.4.3 is not required for control rod drive CRD-22 during cycle 21 until the next entry into Mode 3.

(5) [deleted]

~~This page retained for numbering~~

MARK_UP NOTES:

The NFPA 805 License Condition covers Page 5 and Page 5a.

Existing Page 5, which was blank and retained for number purposes, is now being used for the NFPA 805 License Condition.

Existing Page 5a is being used for the NFPA 805 License Condition. Existing Page 5a content moved to existing Page 5b.

Existing Page 5b content moved to a new Page 5c.

(6) Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

a. Fire fighting response strategy with the following elements:
   1. Pre-defined coordinated fire response strategy and guidance
   2. Assessment of mutual aid fire fighting assets
   3. Designated staging areas for equipment and materials
   4. Command and control
   5. Training of response personnel

b. Operations to mitigate fuel damage considering the following:
   1. Protection and use of personnel assets
   2. Communications
   3. Minimizing fire spread
   4. Procedures for implementing integrated fire response strategy
   5. Identification of readily-available pre-staged equipment
   6. Training on integrated fire response strategy
   7. Spent fuel pool mitigation measures

c. Actions to minimize release to include consideration of:
   1. Water spray scrubbing
   2. Dose to onsite responders

(7) Upon implementation of Amendment 230 adopting TSTF-448-A, revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.5.16.c.(i), the assessment of CRE habitability as required by Specification 5.5.16.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.16.d, shall be considered met. Following implementation:

(a) The first performance. of SR 3.7.10.4, in accordance with Specification 5.5.16.c.(i), shall be within the specified Frequency of six years, plus the 18-month allowance of SR 3.0.2, as measured from June 26, 2007, the date of the most recent successful tracer gas test, as stated in the August 16, 2007, letter response to Generic Letter 2003-01.

(b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.16.c.(ii), shall be within three years, plus the nine-month allowance of SR 3.0.2, as measured from June 26, 2007, the date of the most recent successful tracer gas test, as stated in the August 16, 2007, letter response to Generic Letter 2003-01.

(c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.16.d, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from July 16, 2007, the date of the most recent successful pressure measurement test.

(8) Upon implementation of Amendment 237, within one year of completing each of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Category B-A and B-D reactor vessel weld inspections, submit information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) to the NRC.

D. ~~The facility has been granted certain exemptions from the requirements of Section III, G of Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." This section relates to fire protection features for ensuring the systems and associated circuits used to achieve and maintain safe shutdown are free of fire damage. These exemptions were granted in letters dated February 8, 1983, July 12, 1985, and July 23, 1985.~~

~~In addition,~~ the facility has been granted certain exemptions from Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors." This section contains leakage test requirements, schedules and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. These exemptions were granted in a letter dated December 6, 1989.

These exemptions granted pursuant to 10 CFR 50.12, are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

E. ENO shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Entergy Nuclear Palisades Nuclear Plant Physical Security Plan."

ENO shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Palisades CSP was approved by License Amendment No. 243 (as supplemented by a change approved by License Amendment No. 248).

F. [deleted]

G. ENP and ENO shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

Insert A

(3) Fire Protection

ENO shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the license amendment request dated December 12, 2012, as supplemented by letters dated February 21, 2013, September 30, 2013, October 24, 2013, December 2, 2013, April 2, 2014, May 7, 2014, June 17, 2014, August 14, 2014, November 4, 2014, and _____, as approved in the safety evaluation dated _____. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(a) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

1. Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

2. Prior NRC review and approval is not required for individual changes that result in a risk increase less than $1x10^{-7}$/year (yr) for CDF and less than $1x10^{-8}$/yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

(b) Other Changes that May Be Made Without Prior NRC Approval

1. Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program

elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805, Chapter 3, element is functionally equivalent to the corresponding technical requirement. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard.

The licensee may use an engineering evaluation to demonstrate that changes to certain NFPA 805, Chapter 3, elements are acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are as follows:

- "Fire Alarm and Detection Systems" (Section 3.8);
- "Automatic and Manual Water-Based Fire Suppression Systems" (Section 3.9);
- "Gaseous Fire Suppression Systems" (Section 3.10); and
- "Passive Fire Protection Features" (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated _____, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified by 2, below, risk-informed changes to the licensee's fire

protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2. above.

2. The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of ENO letter PNP 2014-080 dated August 14, 2014, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the second full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

3. The licensee shall implement the items listed in Table S-3, "Implementation Items," of ENO letter PNP 2014-097 dated November 4, 2014, within six months after NRC approval, or six months after a refueling outage if in progress at the time of approval with the exception of Implementation Items 3 and 8 which will be completed once the related modifications are installed and validated in the PRA model.

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

5.4.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;

c. Not used; ~~Site Fire Protection Program implementation.~~

d. All programs specified in Specification 5.5.

ATTACHMENT 2

Revised Renewed Operating License and Technical Specification Changes (Clean)

9 Pages Follow

Revised Enclosure 3 to Original LAR (PNP 2012-106)

(1) Pursuant to Section 104b of the Act, as amended, and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," (a) ENP to possess and use, and (b) ENO to possess, use and operate, the facility as a utilization facility at the designated location in Van Buren County, Michigan, in accordance with the procedures and limitation set forth in this license;

(2) ENO, pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use source and special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Updated Final Safety Analysis Report, as supplemented and amended;

(3) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use byproduct, source, and special nuclear material as sealed sources for reactor startup, reactor instrumentation, radiation monitoring equipment calibration, and fission detectors in amounts as required;

(4) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material for sample analysis or instrument calibration, or associated with radioactive apparatus or components; and

(5) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operations of the facility.

C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) ENO is authorized to operate the facility at steady-state reactor core power levels not in excess of 2565.4 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) The Technical Specifications contained in Appendix A, as revised through Amendment No. xxx, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. ENO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Fire Protection

ENO shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the license amendment request dated December 12, 2012, as supplemented by letters dated February 21, 2013, September 30, 2013, October 24, 2013, December 2, 2013, April 2, 2014, May 7, 2014, June 17, 2014, August

14, 2014, November 4, 2014, and _____, as approved in the safety evaluation dated _____. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(a) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

1. Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

2. Prior NRC review and approval is not required for individual changes that result in a risk increase less than $1x10^{-7}$/year (yr) for CDF and less than $1x10^{-8}$/yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

(b) Other Changes that May Be Made Without Prior NRC Approval

1. Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3

element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805, Chapter 3, element is functionally equivalent to the corresponding technical requirement. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard.

The licensee may use an engineering evaluation to demonstrate that changes to certain NFPA 805, Chapter 3, elements are acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are as follows:

- "Fire Alarm and Detection Systems" (Section 3.8);
- "Automatic and Manual Water-Based Fire Suppression Systems" (Section 3.9);
- "Gaseous Fire Suppression Systems" (Section 3.10); and
- "Passive Fire Protection Features" (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated _____, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified by 2, below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2. above.

2. The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of ENO letter PNP 2014-080 dated August 14, 2014, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the second full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

3. The licensee shall implement the items listed in Table S-3, "Implementation Items," of ENO letter PNP 2014-097 dated November 4, 2014, within six months after NRC approval, or six months after a refueling outage if in progress at the time of approval with the exception of Implementation Items 3 and 8 which will be completed once the related modifications are installed and validated in the PRA model.

(4) Performance of Technical Specifications Surveillance Requirement SR 3.1.4.3 is not required for control rod drive CRD-22 during cycle 21 until the next entry into Mode 3.

(5) [deleted]

(6) Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

a. Fire fighting response strategy with the following elements:
   1. Pre-defined coordinated fire response strategy and guidance
   2. Assessment of mutual aid fire fighting assets
   3. Designated staging areas for equipment and materials
   4. Command and control
   5. Training of response personnel

b. Operations to mitigate fuel damage considering the following:
   1. Protection and use of personnel assets
   2. Communications
   3. Minimizing fire spread
   4. Procedures for implementing integrated fire response strategy
   5. Identification of readily-available pre-staged equipment
   6. Training on integrated fire response strategy
   7. Spent fuel pool mitigation measures

c. Actions to minimize release to include consideration of:
   1. Water spray scrubbing
   2. Dose to onsite responders

(7) Upon implementation of Amendment 230 adopting TSTF-448-A, revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.5.16.c.(i), the assessment of CRE habitability as required by Specification 5.5.16.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.16.d, shall be considered met. Following implementation:

(a) The first performance. of SR 3.7.10.4, in accordance with Specification 5.5.16.c.(i), shall be within the specified Frequency of six years, plus the 18-month allowance of SR 3.0.2, as measured from June 26, 2007, the date of the most recent successful tracer gas test, as stated in the August 16, 2007, letter response to Generic Letter 2003-01.

(b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.16.c.(ii), shall be within three years, plus the nine-month allowance of SR 3.0.2, as measured from June 26, 2007, the date of the most recent successful tracer gas test, as stated in the August 16, 2007, letter response to Generic Letter 2003-01.

(c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.16.d, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from July 16, 2007, the date of the most recent successful pressure measurement test.

Page renumbered

(8) Upon implementation of Amendment 237, within one year of completing each of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Category B-A and B-D reactor vessel weld inspections, submit information and analyses requested in Section (e) of the final 10 CFR 50.61a (or the proposed 10 CFR 50.61a, given in 72 FR 56275 prior to issuance of the final 10 CFR 50.61a) to the NRC.

Page renumbered

D. The facility has been granted certain exemptions from Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors." This section contains leakage test requirements, schedules and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. These exemptions were granted in a letter dated December 6, 1989.

These exemptions granted pursuant to 10 CFR 50.12, are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

E. ENO shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Entergy Nuclear Palisades Nuclear Plant Physical Security Plan."

ENO shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Palisades CSP was approved by License Amendment No. 243 (as supplemented by a change approved by License Amendment No. 248).

F. [deleted]

G. ENP and ENO shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

5.4.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;

c. Not used;

d. All programs specified in Specification 5.5.