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PNP 2015-082

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

**SUBJECT: Palisades Nuclear Plant Report of Changes, Tests and Experiments and  
Summary of Commitment Changes**

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

Dear Sir or Madam:

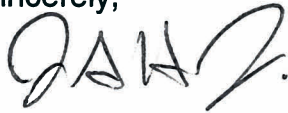
Entergy Nuclear Operations, Inc. (ENO) is submitting the Palisades Nuclear Plant (PNP) Report of Facility Changes, Tests, and Experiments for the time period of September 30, 2013, through September 30, 2015. This report is submitted in accordance with the requirements of 10 CFR 50.59(d)(2) and 10 CFR 72.48(d)(2). During this period, there was one change to the facility, but no tests or experiments, made pursuant to 10 CFR 50.59, and no changes, tests, or experiments made pursuant to 10 CFR 72.48.

Attachment 1 contains a description of the change to the facility, and a summary of the evaluation performed for the change, in accordance with 10 CFR 50.59.

Attachment 2 contains a summary of a regulatory commitment change requiring NRC notification that was made from September 30, 2013, through September 30, 2015. The summary includes a justification for the change per Nuclear Energy Institute (NEI) Guideline NEI 99-04, "Guidelines for Managing NRC Commitment Changes," and NRC Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff."

This letter contains no new commitments and no revised commitments.

Sincerely,

A handwritten signature in black ink, appearing to read 'JAH' followed by a stylized flourish.

JAH/jse

Attachment(s):

1. Palisades Nuclear Plant Report of Changes, Tests, and Experiments
2. Palisades Nuclear Plant Commitment Change Summary Report

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

**ATTACHMENT 1**

**PALISADES NUCLEAR PLANT  
REPORT OF CHANGES, TESTS, AND EXPERIMENTS**

One page follows

# PALISADES NUCLEAR PLANT

## REPORT OF CHANGES, TESTS, AND EXPERIMENTS

**Document Number and Title:** Engineering Change (EC) 48940, "Defeat Dilution Water Interlock for Radwaste Discharge"

### **Activity Description:**

This Engineering Change (EC) installed a temporary jumper to bypass the interlock for the radwaste system valve CV-1054, which discharges liquid radiological waste to the lake.

Normally, the CV-1054 interlock ensures that sufficient dilution water flow is available by terminating the discharge if the breakers to the dilution water pumps are open. Installation of the temporary jumper under the EC allowed CV-1054 to be opened without a dilution water pump in service, and used a safety related service water pump rather than a non-safety related dilution water pump to maintain the required dilution flow when discharging liquid radwaste to the lake.

With the EC installed, the method of performing or controlling the design function performed by the CV-1054 interlock, which is described in the FSAR Liquid Waste Incident safety analysis, was changed. Therefore, a 50.59 evaluation of the EC was required.

### **Summary of 50.59 Evaluation**

The 50.59 Evaluation concluded that installation of a temporary jumper to open CV-1054 to allow the discharge of liquid radwaste with dilution from a service water pump rather than a dilution water pump did not require prior NRC approval.

Discharging radwaste in this configuration did not increase the frequency of an accidental liquid radwaste release that exceeds regulatory limits because the calculated release rate took into account the available dilution flow and because the source of dilution flow was assured to be continuous by using a safety related dilution water source (i.e., a service water pump with a second service water pump in standby). The likelihood of occurrence of a malfunction was not more than minimally increased because the existing non-safety related interlock, which is vulnerable to a single failure, was effectively replaced by a more reliable, safety related, redundant standby pump start system, with a backup safety related power supply, to ensure continuous dilution flow. Based on the existing administrative controls on release tank activity levels, and the use of the more reliable service water pumps for dilution, there was no change in the consequences of a release of the tank contents due to an accident or a malfunction. The possibility of a malfunction with a different result was not created because failure of the EC jumper in the CV-1054 interlock system would terminate the radwaste discharge by closing CV-1054, which is the fail-safe position.

**ATTACHMENT 2**

**PALISADES NUCLEAR PLANT  
COMMITMENT CHANGE SUMMARY REPORT**

One page follows

**PALISADES NUCLEAR PLANT**  
**COMMITMENT CHANGE SUMMARY REPORT**

<b>COMMITMENT NUMBER</b>	<b>DATE OF ORIGINAL COMMITMENT</b>	<b>CHANGED DATE</b>	<b>DESCRIPTION</b>
2010637	05/09/1997	10/07/2014	<p><b>Original text:</b></p> <p>1) The cask loading procedure FHS-M-32 will retain the existing provisions to return the loaded MTC/MSB back into the spent fuel pool if the water in the MSB cannot be removed within the specified time limit as described by Section 1.2.10 of the VSC-24 Certificate of Compliance.</p> <p>2) Contingencies will be incorporated in the cask loading procedure, FHS-M-32, to maintain proper boron concentration within the MTC/MSB if it is placed back into the spent fuel pool.</p> <p><b>Revised text:</b></p> <p>Cancel commitment.</p> <p><b>Summary of justification:</b></p> <p>The commitment is specific to loading of the VSC-24 cask. The site is no longer loading fuel into VSC-24 casks. Spent fuel is now being loaded into casks of a different design.</p>