



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

October 28, 2015

Mr. William D. Reed
80015 Ramblewood Drive
Covert, MI 49043

Dear Mr. Reed:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated September 9, 2015. In your correspondence, you expressed concern about the reactor pressure vessel at Entergy's Palisades Nuclear Power Plant. Specifically, you are concerned with Entergy Nuclear Operations, Inc.'s (ENO's) plan to use an engineering analysis to "theoretically predict" reactor vessel embrittlement instead of withdrawing one of the reactor pressure vessel coupons to more directly measure the amount of neutron embrittlement. You also expressed concern that coupon testing was scheduled for 2007, but "disregarded & never actually done." Additionally, you requested that as the NRC Region III Administrator, I review this issue, in cooperation with the Atomic Safety and Licensing Board (ASLB), and insist that ENO be required to physically conduct coupon testing for embrittlement conditions within the plant's reactor pressure vessel.

Let me first assure you that based on the regulatory reviews accomplished by our staff experts and the onsite inspections performed by our inservice and non-destructive examination specialists, that all regulatory requirements associated with reactor vessel embrittlement and fracture toughness at Palisades are currently being met and that the facility is operating safely. We also have resident inspectors who are assigned to Palisades that reside in the local area and who conduct frequent safety inspections at Palisades to ensure the continued safe operation of the facility.

The concerns that you raised in your letter are the subject of two License Amendment Requests (LARs) that have been submitted to the NRC for review.

In the first of these LARs which ENO submitted by letter dated July 29, 2014, as supplemented by letters dated February 13, April 1, and August 14, 2015 (ADAMS Accession Nos. ML14211A520, ML15050A259, ML15091A468, and ML15230A219, respectively), ENO requested NRC approval for the use of alternate fracture toughness requirements for protection against pressurized thermal shock (PTS) events as provided in 10 CFR 50.61a. The NRC is currently evaluating this LAR and a decision on this request has not yet been made. Several groups requested a hearing on ENO's use of the alternate fracture toughness requirements, which was denied by the ASLB on May 8, 2015 (ADAMS Accession No. ML15128A489). The groups appealed the ASLB decision on June 2, 2015 (ADAMS Accession No. ML15153B263) and the appeal is being considered by the Commission.

Additionally, your letter appears to relate to a second LAR ENO submitted by letter dated November 12, 2014 (ADAMS Accession No. ML14316A370), as supplemented by letter dated

January 28, 2015 (ADAMS Accession No. ML15029A061), which requested NRC approval of an equivalency analysis for meeting the requirements of Appendix G of Section XI of the American Society of Mechanical Engineers Code. The LAR is currently being evaluated by the NRC staff and a decision has not yet been made. Several groups have requested a hearing on this LAR and this request was granted on June 18, 2015 (ADAMS Accession No. ML15169A273). The hearing has not yet occurred and, therefore, a decision on this request has not been made.

With regard to your concern about the coupon testing schedule for Palisades, the NRC staff notes that the modifications to the schedule were made in accordance with Commission regulations. By letter dated September 19, 2006 (ADAMS Accession No. ML062630071), as supplemented by letter dated January 30, 2007 (ADAMS Accession No. ML070300405), the licensee submitted a request for approval of its revised surveillance capsule withdrawal schedule. By letter dated August 14, 2007 (ADAMS Accession No. ML071640310), the NRC approved the licensee's modified withdrawal schedule, because it satisfied regulatory requirements.

A copy of your letter and the NRC's response will be made publicly available in ADAMS.

Sincerely,

/RA/

Cynthia D. Pederson
Regional Administrator

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