

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 3, 2016

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

SUBJECT: PALISADES NUCLEAR PLANT - RELIEF REQUEST NUMBER 4-21,

PROPOSED ALTERNATIVE, USE OF ALTERNATE ASME CODE CASE

N-770-1 BASELINE EXAMINATION (CAC NO. MF6263)

Dear Sir:

By letter dated May 22, 2015 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML15147A613), Entergy Nuclear Operations, Inc. (Entergy, the licensee) submitted a request (RR 4-21) to the U.S. Nuclear Regulatory Commission (NRC) for the use of an alternative to certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) requirements at Palisades Nuclear Plant (PNP). Specifically, the licensee's request was associated with the requirements in 10 CFR 50.55a(g)(6)(ii)(F) for performance of required baseline volumetric examinations of eight cold leg welds and one hot leg weld. The licensee requested to defer the required inspections until refueling outage 1R24 (Fall 2015).

For the reasons set forth in this letter, the NRC staff has decided to discontinue its review of the request.

BACKGROUND

By letter dated February 25, 2014 (ADAMS Accession No. ML14056A533), the licensee submitted a request for relief (RR 4-18), in which a proposed alternative was requested to defer the baseline volumetric examinations of nine primary coolant system (PCS) welds until refueling outage 1R24. The NRC authorized RR 4-18, granting the licensee the deferral until refueling outage 1R24, and documented the technical basis for the authorization by letter dated September 4, 2014 (ADAMS Accession No. ML14223B226).

In March 2015, the licensee noted a discrepancy found in a calculation submitted to support RR 4-18. The licensee submitted the subject request, RR 4-21, in order to document and resolve the discrepancy found in RR 4-18. In particular, RR 4-21 provided revised calculations which accounted for the error in the calculation used to support RR 4-18. Although RR 4-21 also asked again for deferral of the baseline volumetric inspection of the nine PCS welds until the fall 2015 refueling outage, further review of this request is not necessary because of the events described below.

ASSOCIATED NRC INSPECTION ACTIVITIES

On March 31, 2015, the licensee completed an operability evaluation of the nine PCS welds

affected by the calculation error in RR 4-18 and determined they were operable. On August 19, 2015, the NRC staff completed an inspection consisting, in part, of an operability determination review at PNP. The inspection report dated September 17, 2015 (ADAMS Accession No. ML15261A576), explains that the NRC staff performed a series of independent calculations which supported the NRC's review of the licensee's operability determination and determined that the licensee demonstrated an adequate basis for continued operability of the nine PCS welds¹. Thus, the calculation error identified in March 2015 did not affect PNP's ability to operate safely.

LICENSEE PERFORMED INSPECTIONS

Refueling outage 1R24 occurred in fall 2015. During this time, the licensee performed the required baseline volumetric examinations of the eight cold leg welds and one hot leg weld to the maximum extent practicable.² Thus, the period for which the licensee requested relief in RR 4-21 has ended, and it has performed the inspections required by 10 CFR 50.55a(g)(6)(ii)(F).

NRC STAFF REVIEW OF RR 4-21

The purpose of RR 4-21 was to document the discrepancies found in RR 4-18, submit corrected calculations, and request an alternative for baseline volumetric inspection of nine PCS welds until the fall 2015 refueling outage using corrected calculations. The NRC staff notes the following:

- 1. RR 4-18 authorized the licensee to defer the required inspections until the fall 2015 refueling outage, and this permission was not revoked.
- 2. RR 4-21 adequately documents the discrepancies with the RR 4-18 calculations and provides revised calculations which account for the error in the RR 4-18 calculation.
- The licensee established an operability evaluation for the nine PCS welds after identification of the discrepant calculation. The NRC staff reviewed and accepted the licensee's basis for continued operability of the nine PCS welds as documented in the September 17, 2015, inspection report.
- 4. The licensee has satisfactorily performed the required inspections or requested and been authorized the necessary relief for the nine subject PCS welds during the fall 2015 refueling outage. No indications requiring repairs were found during the licensee's inspections.

For these reasons, the NRC staff determined that continued review is no longer of any safety significance and has decided to discontinue its review of RR 4-21.

¹ For related enforcement information, see letter dated November 24, 2015 (ADAMS Accession No. ML15328A534).

² During the outage, the licensee submitted two additional requests associated with the volumetric examinations (see ADAMS Accession Nos. ML15260A371 and ML15269A035). The NRC authorized both of these requests (see ADAMS Accession Nos. ML16022A107 & ML15272A065).

If you have any questions, please contact the Project Manager, Jennivine Rankin at 301-415-1530 or via e-mail at <u>Jennivine.Rankin@nrc.gov</u>.

Sincerely,

David J. Wrona, Chief

Plant Licensing Branch III-1

Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-255

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If you have any questions, please contact the Project Manager, Jennivine Rankin at 301-415-1530 or via e-mail at Jennivine.Rankin@nrc.gov.

Sincerely,

/RA/

David J. Wrona, Chief Plant Licensing Branch III-1 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

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