

**E-44108**

**Attachment 6**

**Letter from Charles Gears (Entergy Nuclear  
Operations, Inc.) to Don Shaw (AREVA),  
“Palisades Voluntary Agreement to Implement  
CoC 1004 Amendment Revisions Which  
Remove the Requirement for a Spent Fuel  
Pool”**



Entergy Nuclear Operations, Inc.  
1340 Echelon Parkway  
Jackson, MS 39213

Charles Gears  
Manager  
Fleet Dry Fuel Storage Services

CEXO-2015-00129

September 29, 2015

Don Shaw  
AREVA TN Licensing Manager

SUBJECT: Palisades Voluntary Agreement to Implement CoC 1004 Amendment Revisions Which Remove the Requirement for a Spent Fuel Pool

Reference: AREVA Inc. letter E-42575, from Paul Triska (AREVA) to NRC Document Control Desk, "Application for Revision to the Standardized NUHOMS® System – CoC 1004, Amendments 0 through 11 and Amendment 13, Docket 72-1004," dated August 24, 2015

Dear Sir:

The purpose of this communication is to confirm the following:

- Entergy Nuclear Operations, Inc. (ENO) is aware of and understands the proposed AREVA Inc. changes to the Certificate of Compliance (CoC) 1004 Standardized NUHOMS® System Technical Specifications and the associated UFSAR changes, which are detailed in the letter referenced above for all approved amendments.
- We ENO understand that these changes will result in Revision 1 to each currently approved CoC 1004 amendment.
- We ENO understand that the previous version of the associated amendments will be superseded in their entirety by Revision 1.
- We ENO agree to voluntarily implement these changes for our general licensee independent spent fuel storage installations (ISFSIs) at the following sites, which operate CoC 1004 Standardized NUHOMS® Systems under one or more amendments:
  - *Palisades Nuclear Plant*
- In order to allow sufficient time to incorporate these changes in a quality manner, we ENO request that AREVA work with the NRC to provide its general licensees a maximum 180-day period after the effective date of the revised amendments during which we ENO can complete incorporation and begin storage operations under the revised amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "CGEARS". The signature is stylized with a large, looped initial "C" and "G".

Charles Gears

cc: Jeffery Hardy, Palisades Manager Regulatory Assurance  
Jeff Erickson, Palisades Regulatory Assurance  
Nelson Crane, Sr. Manager Fleet Fuel Services  
Bob VanWagner, Palisades Dry Fuel Storage Project Manager