



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530
Tel 269-764-2000

Jeffery A. Hardy
Regulatory Assurance Manager

PNP 2017-033

June 29, 2017

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

SUBJECT: Request for Exemption from Specific Provisions in 10 CFR 73.55

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

REFERENCES: 1. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2017-001, "Certification of Permanent Cessation of Power Operations," dated January 4, 2017 (ADAMS Accession Number ML17004A062)

2. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2017-010, "Program Approval – Certified Fuel Handler Training and Retraining Program," dated March 28, 2017 (ADAMS Accession Number ML17087A016)

Dear Sir or Madam:

In accordance with Title 10 of the Code of Federal Regulations (CFR) Part 73, section 5, "Specific exemptions," Entergy Nuclear Operations, Inc. (ENO) requests an exemption from 10 CFR 73.55, paragraph (p), "Suspension of security measures," subparagraphs (1)(i) and (1)(ii), related to the suspension of security measures in an emergency or during severe weather for the Palisades Nuclear Plant (PNP). Regulations 10 CFR 73.55(p)(1)(i) and 10 CFR 73.55(p)(1)(ii) require that the suspension of security measures be approved by a licensed senior operator before taking this action.

ENO is requesting an exemption from these rules to allow as a minimum either a licensed senior operator or a certified fuel handler (CFH) to approve the suspension of security measures, following the submittal of the certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel in accordance with 10 CFR 50.82, "Termination of license," paragraph (a), subparagraphs (1)(i) and (ii). Approval of this exemption request will align 10 CFR 73.55(p)(1)(i) and 10 CFR 73.55(p)(1)(ii) with 10 CFR 50.54, "Conditions of licenses," paragraph (y), as 10 CFR 50.54(y) includes a provision regarding the CFH for facilities that have

submitted the certifications required by 10 CFR 50.82(a)(1). The attachment provides the justification for the requested exemption.

On January 4, 2017, in accordance with 10 CFR 50.82(a)(1)(i), ENO certified that it intends to permanently cease power operations of the PNP on October 1, 2018 (Reference 1). After the certifications of permanent cessation of power operations and permanent removal of fuel from the reactor vessel are submitted in accordance with 10 CFR 50.82(a)(1)(i) and (ii), the 10 CFR Part 50 license will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel pursuant to 10 CFR 50.82(a)(2). As a result, licensed operations will no longer be required to support plant operating activities. Instead, CFHs will perform activities associated with decommissioning, irradiated fuel handling, and management. ENO submitted a CFH Training and Retraining Program for NRC approval in Reference 2.

ENO requests approval of this exemption request by June 27, 2018, and an effective date that follows submittal of the certifications required by 10 CFR 50.82(a)(1).

This letter contains no new or revised commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "JAH2", with a stylized flourish at the end.

JAH/jse

Attachment: Request for Exemption from Specific Provisions in 10 CFR 73.55 for the Palisades Nuclear Plant

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