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Charles F. Arnone  
Site Vice President

PNP 2017-034

August 31, 2017

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

SUBJECT: License Amendment Request – Emergency Plan Revision to Reflect a  
Permanently Shut Down and Defueled Reactor Vessel

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

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

Dear Sir or Madam:

Pursuant to Title 10 of the Code of Federal Regulations, Part 50, Section 90 (10 CFR 50.90), Entergy Nuclear Operations, Inc. (ENO) hereby requests U.S. Nuclear Regulatory Commission (NRC) review and approval of a revision to the Palisades Nuclear Plant (PNP) Site Emergency Plan (SEP).

In Reference 1, ENO certified to the NRC that it plans to permanently cease power operations of PNP on October 1, 2018 in accordance with 10 CFR 50.82, paragraph (a)(1)(i). Once certification of permanent removal of fuel from the reactor vessel is submitted to the NRC in accordance with 10 CFR 50.82, paragraph (a)(1) (ii), and docketed, the 10 CFR 50 license will no longer authorize operation of the reactor or emplacement of fuel in the reactor vessel in accordance with 10 CFR 50.82(a)(2). Therefore, the reason for this proposed amendment is to revise the PNP SEP for the permanently shut down and defueled condition. The proposed changes are being submitted to the NRC for approval prior to implementation, as required under 10 CFR 50.54(q)(4).

Specifically, this request proposes to revise the on-shift and augmented Emergency Response Organization (ERO) staffing given the permanent cessation of power operations and permanent removal of fuel from the reactor vessel. ENO has reviewed the proposed changes against the planning standards in 10 CFR 50.47(b) and requirements in 10 CFR Part 50, Appendix E, and concludes that the standards and requirements will continue to be met.

The description and evaluation of the proposed changes are contained in Attachment 1. Attachment 2 provides a tabular summary of the proposed changes to the PNP SEP. Attachments 3 and 4 provide a marked up version and a clean version (no markup) of the revised PNP SEP, respectively. Attachment 5 provides the analysis of the proposed post-shutdown on-shift staffing. Attachment 6 provides the analysis of ERO tasks that will be transferred to remaining ERO positions following permanent cessation of power operations.

Because of the location of PNP, the planning and responsibilities at the State and County level involve coordination with the State of Michigan, Berrien County, Allegan County, and Van Buren County. On June 6, 2017, a meeting with these agencies and the U. S. Federal Emergency Management Agency (FEMA) region was conducted to discuss the proposed changes to the ERO staffing and the PNP SEP. The proposed changes were evaluated for impacts on the ability of the State and County response organizations to effectively implement their FEMA-approved radiological emergency preparedness (REP) plans. Correspondence from the State and local agencies is provided in Attachment 8.

ENO requests approval of the proposed license amendment by October 1, 2018, and a 90-day implementation period following the effective date of the amendment. ENO requests the approved amendment become effective following submittal of the required 10 CFR 50.82(a)(1)(ii) certification that the PNP reactor vessel has been permanently defueled.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and ENO has determined that this change involves no significant hazards consideration. ENO has also determined that the proposed changes satisfy the criteria for categorical exclusion in accordance with 10 CFR 51.22(c)(9) and do not require an environmental review. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is required.

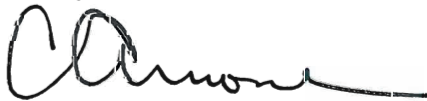
In accordance with 10 CFR 50.91, ENO is notifying the State of Michigan of this proposed license amendment by transmitting a copy of this letter, with attachments, to the designated State of Michigan official.

#### Summary of Commitments

This submittal contains 4 new regulatory commitments and no revisions to existing commitments. See Attachment 7 for a complete listing of commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 31, 2017.

Sincerely,



CFA/jse

- Attachments:
1. Description and Evaluation of the Proposed Changes
  2. Tabular Summary of Proposed Changes to the Palisades Nuclear Plant Site Emergency Plan
  3. Proposed Revision to the Palisades Nuclear Plant Site Emergency Plan (marked up)
  4. Proposed Revision to the Palisades Nuclear Plant Site Emergency Plan (clean)
  5. Analysis of Proposed Post-Shutdown On-Shift Staffing
  6. Emergency Response Organization Task Analysis
  7. List of Regulatory Commitments
  8. State and Local Agency Correspondence on Post-Shutdown Emergency Plan License Amendment Request Meeting

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