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Charles F. Arnone
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PNP 2017-066

November 1, 2017

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

SUBJECT: License Amendment Request to Change the Full Compliance Implementation Date for the Fire Protection Program Transition License Condition for Required Modifications

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

- REFERENCES:
1. NRC letter, "Palisades Nuclear Plant – Issuance of Amendment Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in Accordance with 10 CFR 50.48(c)," dated February 27, 2015 (ADAMS Accession Number ML15007A191)
 2. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2017-001, "Certification of Permanent Cessation of Power Operations," dated January 4, 2017 (ADAMS Accession No. ML17004A062)
 3. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2017-058, "Certification of Permanent Cessation of Power Operations," dated September 28, 2017 (ADAMS Accession No. ML17271A233)
 4. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2017-065, "Supplement to Certification of Permanent Cessation of Power Operations," dated October 19, 2017 (ADAMS Accession No. ML17292A032)

Dear Sir or Madam:

In accordance with 10 CFR 50.90, Entergy Nuclear Operations, Inc. (ENO) requests U.S. Nuclear Regulatory Commission (NRC) review and approval of a revision to the Palisades Nuclear Plant (PNP) renewed facility operating license (RFOL) to change the full compliance implementation date for the fire protection program transition license condition.

In Reference 1, the NRC issued ENO Amendment No. 254 to the PNP RFOL for transition to a risk-informed, performance based fire protection program in accordance with 10 CFR 50.48(c). Subsequent to amendment issuance, in Reference 2, ENO submitted a certification of permanent cessation of power operation notifying the NRC that PNP will permanently cease power operation on October 1, 2018. In Reference 3, ENO notified the NRC that PNP would

continue operation and changed the date that PNP will permanently cease power operation from October 1, 2018 to the spring of 2022. This notification was supplemented in Reference 4, which notified the NRC that PNP will permanently cease power operation no later than May 31, 2022. As a result of ENO's decision to permanently cease power operations at PNP no later than May 31, 2022, rather than permanently ceasing power operations on October 1, 2018, ENO is requesting a change to the full compliance implementation date for the fire protection program transition license condition to allow additional time for completion of the required modifications necessary to achieve full compliance with 10 CFR 50.48(c).

Attachment 1 to this letter provides the basis for the proposed change, and the significant hazards considerations. Attachment 2 to this letter provides the proposed RFOL revision (markup). Attachment 3 to this letter provides the proposed RFOL page changes (clean).

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. The bases for this determination are included in Attachment 1.

ENO requests approval of the proposed license amendment by March 30, 2018, and a 60-day implementation period following the effective date of the amendment.

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 letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 1, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cannon', with a long horizontal line extending to the right.

CFA/ach

Attachments: 1. Analysis of Proposed Operating License Change
 2. Proposed Renewed Facility Operating License Changes (markup)
 3. Proposed Renewed Facility Operating License Page Changes (clean)

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

ATTACHMENT 1

Analysis of Proposed Operating License Change

5 pages follow

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ATTACHMENT 1
ANALYSIS OF PROPOSED OPERATING LICENSE CHANGE

1.0 SUMMARY DESCRIPTION

This license amendment request (LAR) includes a proposed change to the Palisades Nuclear Plant (PNP) renewed facility operating license (RFOL) to change the full compliance implementation date for the fire protection program transition license condition. This date change is requested to allow additional time for completion of the required modifications necessary to achieve full compliance with 10 CFR 50.48(c) as a result of ENO's decision to permanently cease power operations at PNP no later than May 31, 2022, rather than permanently ceasing power operations on October 1, 2018 (Reference 3 & 4).

2.0 DETAILED DESCRIPTION

In Reference 1, the Nuclear Regulatory Commission (NRC) issued ENO Amendment No. 254 to the PNP RFOL for transition to a risk-informed, performance based fire protection program in accordance with 10 CFR 50.48(c). The issued amendment contained a transition license condition that required that the NFPA 805 modifications be implemented before the end of the second full operating cycle after NRC approval, which required NFPA 805 modification implementation before the end of the fall 2018 refueling outage. In Reference 2, ENO notified the NRC that PNP would permanently cease power operations on October 1, 2018. Due to this notification, ENO suspended work on the NFPA 805 modifications because they would no longer be required due to the timing of the permanent cessation of operation at PNP. In addition, ENO planned to change the fire protection program to a 10 CFR 50.48(f) program applicable to a decommissioned facility prior to the end of 2018. As a result, the NFPA 805 modifications scheduled for implementation during the spring 2017 refueling outage were removed from the outage schedule.

Recently, ENO notified the NRC it had changed the date that PNP will permanently cease power operation from October 1, 2018 to no later than May 31, 2022 (Reference 3 & 4). Due to this change in date for permanent cessation of power operations, ENO now plans to complete PNP's transition to 10 CFR 50.48(c).

Currently, the implementation of the PNP NFPA 805 modifications is required before the end of the fall 2018 refueling outage. ENO is requesting a one fuel cycle extension for NFPA 805 modification implementation at PNP. This extension is requested because with continued operation to no later than May 31, 2022, ENO recently began planning and preparing for a 2018 refueling outage versus a 2018 defuel outage. This change in outage scope has shortened the period available for outage planning which challenges the completion of the NFPA 805 modifications during the 2018 refueling outage. Certain outage milestones, that are established to ensure successful modification implementation, have already been missed. Therefore, ENO is requesting a change to the full compliance implementation date for the fire protection program transition license condition to allow additional time for completion of the required modifications necessary to achieve full compliance with 10 CFR 50.48(c).

3.0 TECHNICAL EVALUATION

ENO proposes to revise the fire protection program license condition. Specifically, ENO proposes to revise part of the transition license condition, 2.C.(3)(c)2.

Currently, transition license condition 2.C.(3)(c)2 reads as follows:

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2. *The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of ENO letter PNP 2014-080 dated August 14, 2014, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the second full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.*

The current transition license condition wording would require ENO to fully implement the NFPA 805 modifications before the end of the fall 2018 refueling outage. ENO is proposing to revise transition license condition 2.C.(3)(c)2 wording as follows:

2. *The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of ENO letter PNP 2014-080 dated August 14, 2014, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the refueling outage following the third full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.*

The proposed transition license condition wording would require the NFPA 805 modifications to be fully implemented before the end of (startup from) the summer 2020 refueling outage.

The license condition language is being revised to include "refueling outage" for clarity purposes to avoid confusion regarding what constitutes the end of an operating cycle. Also, the language "before the end of" equates to "prior to startup" for clarity purposes.

A one cycle extension from the fall 2018 refueling outage to the summer 2020 refueling outage to implement NFPA 805 modifications is acceptable because the fire protection transition license conditions will remain in effect during this period, including maintaining compensatory measures, until the NFPA 805 modifications are fully implemented. Additionally, the license condition for risk-informed changes that may be made without prior NRC approval is not effective until PNP has completed the NFPA 805 modifications and is in full compliance with 10 CFR 50.48(c).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

On July 16, 2004, the NRC amended 10 CFR 50.48, "Fire Protection," to add a new subsection, 10 CFR 50.48(c), which establishes alternative fire protection requirements. 10 CFR 50.48 endorses, with exceptions, NFPA 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," 2001 Edition (NFPA 805), as a voluntary alternative for demonstrating compliance with 10 CFR 50.48 Section (b), concerning Appendix R, and Section (f), concerning decommissioning.

The voluntary adoption of 10 CFR 50.48(c) by PNP does not eliminate the need to comply with 10 CFR 50.48(a) and 10 CFR 50, Appendix A, and General Design Criteria (GDC) 3, "Fire Protection." The new rule provides actions that may be taken to establish compliance with 10 CFR 50.48(a), which requires each operating nuclear power plant to have a fire protection program plan that satisfies GDC 3, as well as specific requirements in that section. The transition process described in 10 CFR 50.48(c)(3)(ii) provides, in pertinent parts, that a

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licensee intending to adopt the new rule must, among other things, "modify the fire protection plan required by paragraph (a) of that section to reflect the licensee's decision to comply with NFPA 805." Therefore, to the extent that the contents of the existing fire protection program plan required by 10 CFR 50.48(a) is inconsistent with NFPA 805, the fire protection program plan must be modified to achieve compliance with the requirements in NFPA 805. All other requirements of 10 CFR 50.48(a) and GDC 3 have corresponding requirements in NFPA 805.

4.2 Significant Safety Hazards Consideration

Entergy Nuclear Operations, Inc. (ENO) is requesting an amendment to the Palisades Nuclear Plant (PNP) renewed facility operating license (RFOL) to change the full compliance implementation date for the fire protection program transition license condition to allow additional time for completion of the required modifications necessary to achieve full compliance with 10 CFR 50.48(c).

ENO has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change to the PNP RFOL to change the full compliance implementation date for the fire protection program transition license condition to allow additional time for completion of the required modifications necessary to achieve full compliance with 10 CFR 50.48(c) is administrative in nature. This change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents, and has no impact on the probability or consequences of an accident previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change to the PNP RFOL to change the full compliance implementation date for the fire protection program transition license condition to allow additional time for completion of the required modifications necessary to achieve full compliance with 10 CFR 50.48(c) is administrative in nature. This proposed change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The

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proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents and does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change to the PNP RFOL to change the full compliance implementation date for the fire protection program transition license condition to allow additional time for completion of the required modifications necessary to achieve full compliance with 10 CFR 50.48(c) is administrative in nature. Plant safety margins are established through limiting conditions for operation, limiting safety system settings, and safety limits specified in the technical specifications. Because there is no change to established safety margins as a result of this change, the proposed change does not involve a significant reduction in a margin of safety.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, ENO concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of “no significant hazards consideration” is justified.

4.3 Conclusion

In conclusion, based on the considerations discussed above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment revises the PNP RFOL to change the NFPA 805 full compliance implementation date for the fire protection program transition license condition associated with implementation of NFPA 805 modifications. The proposed amendment meets the eligibility criterion for a categorical exclusion set forth in 10 CFR 51.22(c)(12). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 REFERENCES

1. NRC letter, “Palisades Nuclear Plant – Issuance of Amendment Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in Accordance with 10 CFR 50.48(c),” dated February 27, 2015 (ADAMS Accession Number ML15007A191)

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**PNP 2017-066
ATTACHMENT 2**

Revised Renewed Facility Operating License (markup)

(Showing proposed changes; additions are underlined and deletions are strikethrough)

1 page follows

(c) Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified by 2, below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2. above.
 2. The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of ENO letter PNP 2014-080 dated August 14, 2014, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the refueling outage following the third ~~second~~ full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
 3. The licensee shall implement the items listed in Table S-3, "Implementation Items," of ENO letter PNP 2014-097 dated November 4, 2014, within six months after NRC approval, or six months after a refueling outage if in progress at the time of approval with the exception of Implementation Items 3 and 8 which will be completed once the related modifications are installed and validated in the PRA model.
- (4) The following requirements shall apply to control rod drive CRD-13 during cycle 25:
- (a) Performance of Technical Specifications Surveillance Requirement SR 3.1.4.3 is not required for CRD-13 until the next entry into Mode 3.
 - (b) Seal leakage on CRD-13 shall be repaired prior to entering Mode 2, following the next Mode 3 entry.
 - (c) The reactor shall be shut down if CRD-13 seal leakage exceeds two gallons per minute.
- (5) [deleted]

**Operating License Page Change Instructions
and
Revised Renewed Facility Operating License (clean)**

2 pages follow

Page Change Instructions

ATTACHMENT TO LICENSE AMENDMENT NO. 2XX

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Remove the following page of Renewed Facility Operating License, and replace with the attached revised page. The revised page is identified by amendment number and contains a line in the margin indicating the area of change.

REMOVE

Page 5a

INSERT

Page 5a

(c) Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified by 2, below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2. above.
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 - (c) The reactor shall be shut down if CRD-13 seal leakage exceeds two gallons per minute.
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