

## **NRR-DMPSPEm Resource**

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**From:** Wall, Scott  
**Sent:** Thursday, November 30, 2017 2:15 PM  
**To:** MIKSA, JAMES P  
**Cc:** ERICKSON, JEFFREY S; Rankin, Jennivine  
**Subject:** Palisades - Final RAIs Concerning Admin TS LAR for Defueled Condition (CAC MG0021; EPID L-2017-LLA-0266)  
**Attachments:** LTR - Final RAIs - Admin TS Changes.pdf

Jim,

Attached are requests for additional information (RAIs) concerning the July 27, 2017 (ADAMS Accession No. ML17208A428), Entergy Nuclear Operations, Inc. (ENO, the licensee) submittal regarding changes to the Palisades Nuclear Plant (Palisades) Technical Specifications (TS) Sections 1.0, "Use and Application"; and 5.0, "Administrative Controls," to reflect the permanently defueled condition.

As discussed in our phone on November 30, 2017, ENO has agreed to a 30 day response to these RAIs.

Regards,

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

CHANGES TO ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL

SPECIFICATIONS FOR PERMANENTLY DEFUELED CONDITION

PALISADES NUCLEAR PLANT

DOCKET NUMBER 50-255

By letter dated July 27, 2017 (ADAMS Accession No. ML17208A428), Entergy Nuclear Operations, Inc. (ENO, the licensee) submitted a license amendment request for changes to the Palisades Nuclear Plant (Palisades) Technical Specifications (TS) Sections 1.0, "Use and Application"; and 5.0, "Administrative Controls," to reflect the permanently defueled condition.

The NRC staff has reviewed the application and determined that additional information is needed for the staff to complete its review.

**RAI-1**

The current Subsection 5.2.1d states: "The individuals who train the operating staff and those who carry out radiation safety and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures."

The proposed Subsection 5.2.1d states: "The individuals who train the CERTIFIED FUEL HANDLERS, carry out radiation protection, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their ability to perform their assigned functions."

- a. Clarify who the individuals are that the proposed TS 5.2.1d refers (i.e. is the requirement intended to apply to any individual who has responsibility for any of the three listed duties, or is it intended to apply to a more limited group of individuals?)
- b. If needed, propose new wording for TS 5.2.1d.

**RAI-2**

The current TS 5.3.1. states: "Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Entergy Quality Assurance Program Manual (QAPM)."

The proposed TS 5.3.1. states: "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM)."

Clarify why the title of TS Section 5.3, which refers to "Plant Staff Qualifications," continues to use the term "plant," and does not reflect the change from an operating plant to a permanently defueled facility.