



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

September 26, 2018

LICENSEES: Entergy Nuclear Operations, Inc.

FACILITIES: Palisades Nuclear Plant

SUBJECT: SUMMARY OF SEPTEMBER 20, 2018, PUBLIC TELECONFERENCE CALL WITH ENTERGY NUCLEAR OPERATIONS, INC., REGARDING UPCOMING LICENSE AMENDMENT REQUEST TO RELOCATE SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL (EPID L-2018-LRM-0057)

On September 20, 2018, a Category 1 public teleconference call was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Entergy Nuclear Operations, Inc. (ENO, the licensee). The purpose of the call was to discuss a proposed license amendment request (LAR) to relocate surveillance requirement (SR) frequencies from the technical specifications (TSs) to licensee control for the Palisades Nuclear Plant (PNP).

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML18255A013. The meeting notice is also posted on the NRC public website. The licensee's presentation is available at ADAMS Accession No. ML18257A102.

Entergy stated that it plans to submit an LAR to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-425, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b," which will allow specific PNP TS SR frequencies to be relocated to a surveillance frequency control program. The new SFCP will be added to TS Section 5, "Administrative Controls." The LAR will be consistent with the TSTF-425 model application and will consist of a cover letter and seven attachments. The submittal will include four tables that compare the TSTF-425 to the PNP TSs. Entergy described a few of the PNP variations from TSTF-425.

Entergy briefly discussed its probabilistic risk assessment (PRA) adequacy. According to Entergy, the PNP PRA is compliant with Regulatory Guide 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and American Society for Mechanical Engineers/American Nuclear Society PRA standard RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications." It also meets NEI 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies," requirements for a risk-informed TS frequency change program.

Palisades currently has an internal events PRA model, which was revised and issued in 2017, an internal flooding PRA model, and an internal fire PRA model. Entergy summarized a 2010 peer review of its internal events PRA. The 14 internal events findings that remain open after peer and closure reviews will be presented in the LAR along with a discussion of any potential impact on the LAR. Entergy stated that none of the resolutions to the findings and observations were considered to be "upgrades." Entergy indicated that one plant change, related to instrument air, that has not yet been implemented may potentially impact the PNP PRA. Entergy also stated that significant modifications related to the implementation of National Fire Protection Association (NFPA) 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," will be installed during the refueling outage (RFO) scheduled for this fall, and others will be installed during a later RFO. In response to an NRC staff question, Entergy stated that the staff will be able to discern which modifications are credited in the PRA and which are not. The NRC staff also questioned if the fire PRA will reflect the as-built/as-installed configuration. Entergy replied affirmatively, and that it has performed a sensitivity study to show the impact of modifications that have not yet been implemented. The NRC staff suggested that a statement in the LAR about how Entergy treated external events would be beneficial.

Entergy plans to submit the LAR by the end of September 2018, and will request approval by September 30, 2019, with a 90-day implementation period.

The public was invited to listen to the call and was given an opportunity to communicate with the NRC after the business portion, but before the call was ended. Members of the public were present on the call; however, no comments were made to the NRC staff.

No regulatory decisions or commitments were made during the meeting. No public meeting feedback forms were received.

A list of meeting attendees is enclosed.

Please direct any inquiries to me at 301-415-1627, or Kimberly.Green@nrc.gov.



Kimberly J. Green, Senior Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

SEPTEMBER 20, 2018, PUBLIC TELECONFERENCE CALL

WITH ENTERGY NUCLEAR OPERATIONS, INC.

PALISADES NUCLEAR PLANT

NAME	ORGANIZATION
Kim Green	NRC/NRR/DORL
Joel Wiebe	NRC/NRR/DORL
Mihaela Biro	NRC/NRR/DRA
Adrienne Brown	NRC/NRR/DRA
Terrence Brimfield	NRC/NRR/DSS
Vijay Goel	NRC/Region III
Paul LaFlamme	NRC/Region III
Julie Boettcher	NRC/Region III
Jim Miksa	Entergy/Palisades
Jeff Erickson	Entergy/Palisades
Jeff Hardy	Entergy/Palisades
Bob White	Entergy/Palisades
Steve Mongeau	Entergy/Palisades
Jana Bergman	Curtiss-Wright

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Meeting Notice ML18255A013

Slides ML18257A102

Summary ML18268A280

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3	NRR/DORL/LPL3/PM
NAME	KGreen	JRohrer	DWrona	KGreen
DATE	9/26/18	9/26/18	9/26/18	9/26/18

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