



Entergy Nuclear Operations, Inc.
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PNP 2018-062

December 14, 2018

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

SUBJECT: Withdrawal - License Amendment Request – Application to Revise Technical Specifications to Adopt TSTF-425, Revision 3, *Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b*

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

- REFERENCES:**
1. Entergy Nuclear Operations, Inc. letter, PNP 2018-025, "License Amendment Request – Application to Revise Technical Specifications to Adopt TSTF-425, Revision 3, *Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b*," dated September 27, 2018 (ADAMS Package Accession Number ML18270A320)
 2. NRC meeting summary, "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)", dated September 26, 2018 (ADAMS Accession Number ML18268A280)
 3. NRC letter, "Palisades Nuclear Plant – Supplemental Information Needed for Acceptance of Requested Licensing Action Re: Amendment Request to Revise Technical Specifications to Adopt TSTF-425, Revision 3 (EPID L-2018-LLA-0258)," dated November 8, 2018 (ADAMS Accession Number ML18309A134)
 4. Entergy Nuclear Operations, Inc. letter, PNP 2018-052, "Supplement to License Amendment Request – Application to Revise Technical Specifications to Adopt TSTF-425, Revision 3, *Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b*," dated November 16, 2018 (ADAMS Package Accession Number ML18320A002)

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request (LAR) to adopt TSTF-425, Revision 3, *Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b*. The LAR submittal was preceded by a public pre-submittal meeting during which ENO described the content of the LAR, including the status of the Palisades Nuclear Plant (PNP) probabilistic risk assessment models, as documented in Reference 2.

In Reference 3, the U.S. Nuclear Regulatory Commission (NRC) notified ENO that the NRC staff performed an acceptance review of the LAR in accordance with the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-109, Revision 2, "Acceptance Review Procedures," and concluded that the supplemental information delineated in the enclosure to the letter is needed to enable the staff to make an independent assessment regarding the acceptability of the proposed LAR.

On November 11, 2018, ENO had a clarification call with NRC staff to ensure that the supplemental information requested by the staff in Reference 3 was understood by ENO staff.

In Reference 4, ENO submitted supplemental information as requested by Reference 3.

During a teleconference call on December 10, 2018, ENO and the NRC staff discussed the status of the LAR. The NRC staff discussed the supplemental information provided in Reference 4 concerning open Facts and Observations (F&Os) associated with human reliability analysis dependencies in the PNP probabilistic risk assessment (PRA) model. The NRC staff indicated that the supplemental information provided was not sufficient to enable the staff to determine how the identified gaps from the PRA standard will be used to identify appropriate sensitivity cases per the guidance described in NEI 04-10 Revision 1. Since the related F&Os were unable to be closed by the peer review closure team, ENO has elected to implement PRA model changes. Because ENO may not be able to make the PRA model changes and conduct a focused peer review prior to the acceptance review time period expiring, ENO is withdrawing the LAR submitted in Reference 1.

This letter identifies no new commitments and no revisions to existing commitments.

Sincerely,



JAH / jpm

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