



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

July 29, 2019

Mr. Charles Arnone
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

**SUBJECT: PALISADES NUCLEAR PLANT—INFORMATION REQUEST FOR NRC
TRIENNIAL EVALUATIONS OF CHANGES, TESTS, AND EXPERIMENTS (50.59)
BASELINE INSPECTION; INSPECTION REPORT 05000255/2019011**

Dear Arnone:

On October 28, 2019, the U.S. Nuclear Regulatory Commission (NRC) will begin a 50.59 Baseline Inspection at the Palisades Nuclear Plant. This inspection will be performed in accordance with the NRC baseline Inspection Procedure 71111.17T. The onsite portion of the inspection will take place during the week of October 28, 2019.

Experience has shown that these baseline inspections are extremely resource intensive, both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both parties, we have enclosed a request for documents needed for the inspection. These documents have been divided into three groups.

- The first group of information is necessary to ensure that the inspection team is adequately prepared for the inspection. This information should be made available via CD and delivered to the regional office no later than September 16, 2019. The inspection team will review this information and, by September 30, 2019, will request specific items that should be provided for review in the regional office by October 14, 2019.
- The second group of requested documents contains additional items that the team will review, or need access to, during the inspection. Certain documents contained within Group II (i.e., Item (1)), will be requested for review in the regional office prior to the inspection by October 14, 2019, as identified above. The remaining documents should be available by the first day of the onsite inspection, October 28, 2019.
- The third group lists information necessary to aid the inspection team in tracking issues identified as a result of the inspection. It is requested that this information be provided to the lead inspector as the information is generated during the inspection. It is important that all of these documents are up to date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

The lead inspector for this inspection is Mr. Dariusz Szwarc. We understand that our regulatory contact for this inspection is Ms. Barb Dotson of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at 630-829-9803 or via e-mail at Dariusz.Szwarc@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations*, Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA Alan Dahbur Acting for/

Dariusz Szwarc, Senior Reactor Inspector
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-255
License No. DPR-20

Enclosure:
Document Request for 50.59 Inspection

cc: Distribution via LISTSERV®

Letter to Charles Arnone from Dariusz Szwarc dated July 29, 2019.

SUBJECT: PALISADES NUCLEAR PLANT—INFORMATION REQUEST FOR NRC
TRIENNIAL EVALUATIONS OF CHANGES, TESTS, AND EXPERIMENTS (50.59)
BASELINE INSPECTION; INSPECTION REPORT 05000255/2019011

DISTRIBUTION:

Douglas Dodson
RidsNrrPMPalisades Resource
RidsNrrDorLpl3
RidsNrrDirslrib Resource
Darrell Roberts
John Giessner
Jamnes Cameron
Allan Barker
DRPIII
DRSIII

ADAMS Accession Number: ML19210D402

OFFICE	RIII						
NAME	ADahbur for DSzwarc:cl						
DATE	07/29/19						

OFFICIAL RECORD COPY

DOCUMENT REQUEST FOR 50.59 INSPECTION

Inspection Report: 05000255/2019011

Inspection Dates: October 28, 2019, through November 1, 2019

Inspection Procedure: 71111.17T, "Evaluations of Changes, Tests, and Experiments"

Lead Inspector: Dariusz Szwarc
630-829-9803
Dariusz.Szwarc@nrc.gov

I. Information Requested for In-Office Preparation Week

The following information is requested by September 16, 2019, or sooner, to facilitate the selection of specific items that will be reviewed during the onsite inspection week. The inspection team will select specific items from the information requested below and submit a list to your staff by September 30, 2019. We will request that certain items be made available to the regional office prior to the inspection by October 14, 2019. We request that the remaining items selected from the lists be available and ready for review on the first day of inspection. All requested information should identify the associated system and cover the time frame from the receipt of information for the last MOD/50.59 inspection to the present.

The required information identified below should be provided on CD. Please provide three copies of each CD submitted (i.e., one for each inspector). The preferred file format is a searchable "pdf" file. The CDs should be indexed and hyper-linked to facilitate ease of use, if possible. If you have any questions regarding this information, please call the inspection team leader as soon as possible.

- (1) List of all Title 10 of the *Code of Federal Regulations* (CFR), Part 50.59 completed evaluations involving (a) calculations, (b) procedure revisions, (c) changes to the facility (modifications), (d) non-routine operating configurations, or (e) departures in methods of analyses. This list should include 50.59 evaluations for the following:
 - a. Changes that have been made under the provisions of 10 CFR 50.59 that have been updated in accordance with 10 CFR 50.71(e)(4) since the last MOD/50.59 inspection;
 - b. Modifications that are field work complete; and
 - c. Changes to calculations (or initiation of new calculations) that have been issued. The list should contain the number and title of each document, a brief description of the change, and the corresponding number and type of the affected document (i.e., the modification or procedure to which the evaluation applies). The list should NOT include any evaluations in which prior U.S. Nuclear Regulatory Commission approval was sought and obtained.

Enclosure

DOCUMENT REQUEST FOR 50.59 INSPECTION

- (2) A list of all 10 CFR 50.59 changes that have been screened out as not requiring a full evaluation involving: (a) calculations; (b) procedure revisions; (c) changes to the facility (modifications); (d) non-routine operating configurations; or (e) departures in methods of analyses.

The list should contain the number and title of each document, and the corresponding number and type of the affected document (i.e., the modification or procedure to which the evaluation applies).

- (3) A list of any modifications, procedure revisions, or Updated Final Safety Analysis Report (UFSAR) changes where it was determined that 10 CFR 50.59 did not apply.
- (4) A list of calculation changes that have been issued for use.
- (5) A list of corrective action documents (open and closed) that address 10 CFR 50.59 issues, concerns, or processes. These documents should also include the corrective action documents associated with the modification and the 50.59 change implementation.

The list should contain the number, title and revision (or date) of each document, the affected system and corresponding documentation (if applicable), and should be sorted in order of significance.

- (6) Copies of procedures addressing the following: modifications, design changes, set point changes, equivalency evaluations or suitability analyses, commercial grade dedications, post-modification testing, 10 CFR 50.59 evaluations and screenings, and UFSAR updates.
- (7) UFSAR updates submitted in accordance with 10 CFR 50.71(e)(4). Provide copies of the complete submittal.
- (8) Copy of the UFSAR change log or a synopsis of the changes. This should include all of the changes made to the UFSAR that were incorporated in the last 10 CFR 50.71(e)(4) submittal.
- (9) Electronic copy of the UFSAR and technical specifications, if available.
- (10) Name(s) and phone numbers for the regulatory and technical contacts.
- (11) Current management and engineering organizational chart.

II. Information Requested to be Available Prior to Inspection. Requests will be Made for Specific Item (1) Documents by September 30, 2019 for Availability of Requested Item (1) Documents in Regional Office by October 14, 2019, and Items (2), (3) and (4) Documents on First Day of Inspection (October 28, 2019).

- (1) Copies of all selected items from Section I. This includes copies of associated documents such as calculations, modification packages (including description), 10 CFR 50.59 evaluations or screenings, and any corrective action documents

DOCUMENT REQUEST FOR 50.59 INSPECTION

- (2) Copies of these documents do not need to be solely available to the inspection team as long as the inspectors have easy and unrestrained access to them.
 - a. Updated Final Safety Analysis Report, if not previously provided;
 - b. Original FSAR Volumes;
 - c. Original SER and Supplements;
 - d. Final Safety Analysis Report Question and Answers;
 - e. Quality Assurance Plan;
 - f. Technical Specifications, if not previously provided;
 - g. Latest IPE/PRA Report;
 - h. Vendor Manuals; and
 - i. The latest 10 CFR 50.59 UFSAR Update Submittal.
- (3) Please ensure that other supporting documents for the selected items have been located and are readily retrievable as the inspection team will likely be requesting these documents during the inspection. Examples of supporting documents are:
 - a. Drawings supporting the modifications;
 - b. Procedures affected by the modifications; and
 - c. UFSAR change papers generated due to a 10 CFR 50.59 evaluation.
- (4) Assessment and Corrective Actions:
 - a. The most recent 50.59 Quality Assurance audit and/or self-assessment; and
 - b. Corrective action documents (e.g., condition reports, including status of corrective actions) generated as a result of the most recent 50.59 Quality Assurance audit and/or self-assessment.

III. Information Requested to be provided throughout the inspection

- (1) Copies of any corrective action documents generated as a result of the inspection team's questions or queries during this inspection.
- (2) Copies of the list of questions submitted by the inspection team members and the status/resolution of the information requested (provide daily during the inspection to each inspection team member).

If you have any questions regarding the information requested, please contact the inspection team leader.