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10 CFR 50.59(d)(2)
10 CFR 72.48(d)(2)

PNP 2021-012

October 7, 2021

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

SUBJECT: Palisades Nuclear Plant Report of Changes, Tests and Experiments, and
Summary of Commitment Changes

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

Entergy Nuclear Operations, Inc. (Entergy) is submitting the Palisades Nuclear Plant (PNP) Report of Changes, Tests and Experiments, and the Summary of Commitment Changes report for the period October 1, 2019, through September 30, 2021. The Report of Changes, Tests and Experiments is submitted in accordance with the requirements of Title 10 of the Code of Federal Regulations, Part 50, Section 59 (10 CFR 50.59), "Changes, tests and experiments," paragraph (d)(2) and 10 CFR, Part 72, Section 48 (10 CFR 72.48), "Changes, tests, and experiments," paragraph (d)(2). During this period, there were four changes to the facility, but no tests or experiments, made pursuant to 10 CFR 50.59, and no changes, tests, or experiments made pursuant to 10 CFR 72.48.

The report in Enclosure 1 contains descriptions of the changes to the facility, and summaries of the evaluations performed for the changes, in accordance with 10 CFR 50.59(d)(2) and 10 CFR 72.48(d)(2).

Enclosure 2 contains a summary report of regulatory commitment changes requiring NRC notification that were made from October 1, 2019, through September 30, 2021. During this period, there was one commitment change. The report includes a justification for each change per Nuclear Energy Institute (NEI) Guideline NEI 99-04, "Guidelines for Managing NRC Commitment Changes," and NRC Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff."

This letter contains no new commitments and no revised commitments.

Should you have any questions or require additional information, please contact Jim Miksa, regulatory assurance engineer at (269) 764-2945.

Respectfully,

A handwritten signature in black ink that reads "Barbara E. Dotson". The signature is written in a cursive style with a large, looping initial 'B'.

Barbara E. Dotson

BED/jpm

Enclosures: 1. Palisades Nuclear Plant, Report of Changes, Tests and Experiments
2. Palisades Nuclear Plant, Commitment Change Summary Report

cc: NRC Region III Regional Administrator
NRC Senior Resident Inspector - Palisades Nuclear Plant
NRC Project Manager – Palisades Nuclear Plant

Enclosure 1 to

PNP 2021-012

Palisades Nuclear Plant, Report of Changes, Tests and Experiments

PALISADES NUCLEAR PLANT, REPORT OF CHANGES, TESTS AND EXPERIMENTS

10 CFR 50.59/72.48 Evaluation Log Number	Document Number and Title
18-0051 R1	Engineering Change (EC) 55441 R0, "Install High Head AFW Pump P-8D & Shed and Cross Connect Tank T-2 to T-939"
20-0058 R1	Engineering Change (EC) 76687 R1, "V-24A/B/C/D Emergency Diesel Generator Room Ventilation Fans Modify Control Circuit to Resolve CR-PLP-2016-03456"
20-0059 R1	Engineering Change (EC) 76688 R1, "V-27A/B/C/D Engineering Safeguards Room Ventilation Fans Modify Control Circuit to Resolve CR-PLP-2016-03456"
20-0118 R1	Engineering Change (EC) 27518 R1, "Base EC to Replace MCC Breaker Buckets on MCC 1, 2, 7, 8"

10 CFR 50.59 Evaluation Log Number: 18-0051 R1

Document Number and Title:

Engineering Change (EC) 55441 Revision 0 – “Install High Head AFW Pump P-8D & Shed and Cross Connect Tank T-2 to T-939”

Description of Change:

Revision 1 to the 10 CFR 50.59 evaluation, log number 18-0051 R1, revised the 50.59 evaluation to include a manual operator action discussed in EC55441 that was not included in revision 0 of the 50.59 evaluation. This omission was identified and documented in CR-PLP-2019-04880. The manual operator action evaluated involves opening a locked closed manual valve to align the Fire Protection System (FPS) as a suction source to Auxiliary Feedwater Pumps P-8A and P-8B in the event a backup water suction source is required. The 50.59 evaluation revision 1 conclusions are unchanged from revision 0 (i.e., the change does not require NRC approval).

Palisades is transitioning the Fire Protection Program licensing basis to NFPA 805 per 10CFR50.48(c). As a result of the license amendment request (LAR) submitted to the NRC, the issued license amendment (Amendment 254), and the associated safety evaluation report (SER) dated 2/27/2015, a series of plant modifications are required as part of the transition to an NFPA 805 Fire Protection Program. The analyses performed to support the NFPA 805 transition identified fire scenarios that may result in a loss of feedwater to the steam generators. Several rooms (including the Cable Spreading Room and 1D Switchgear Room) contain cables for both auxiliary feedwater (AFW) system trains that may be damaged by a postulated fire and, when combined with random equipment failures considered in risk informed analysis, a complete loss of AFW flow can occur.

The change (EC 55441) installed a new non-safety-related, high-head, diesel-driven AFW pump (P-8D), associated piping, and valves that will be free of fire damage from scenarios that impact the operation of the existing AFW system trains, as described in NFPA 805 LAR, Attachment S, Item S2-1. Pump P-8D, Diesel Driven Auxiliary Feedwater Pump does not rely on plant systems to support operation. No controls or indication directly associated with the pump are located in the Control Room or at the alternate shutdown panel.

The change also installed a cross-connect pipeline and valves between Demineralized Water Storage Tank, T-939, and the Condensate Storage Tank, T-2, as described in NFPA 805 LAR, Attachment S, item S2-10. Currently, tank T-2 inventory alone is not sufficient for 24 hours of decay heat removal following reactor trip without the use of fire water. With this change, tank T-2 will still normally be aligned to supply water to the suction of AFW pumps P-8A, P-8B, and P-8C. However, upon detecting low T-2 levels, mechanically actuated automatic control valve CV-0790, installed by the modification, will open, and allow AFW pumps P-8A, P-8B, and P-8C to take suction from T-939 as well as T-2. The new cross-connection is a benefit to the plant and will ensure that sufficient water inventory from these tanks is available to supply the AFW system for at least 24 hours (the risk informed system mission time) without operator action outside the Control Room. There are two potentially adverse impacts to a UFSAR-described design function that require evaluation due to this design modification as described below:

AFW Operator Actions in Response to Seismic or Tornado/High Wind Event

With the change, T-2 will remain normally aligned to supply water to the suction of AFW pumps P- 8A, P-8B, and P-8C. Non-safety-related Demineralized Water Storage Tank T-939 is connected to the suction of the AFW pumps with the new cross-connect pipeline that is normally isolated via a new automatic control valve, CV-0790, until low T-2 levels are detected by the valve. Tank T-939 and associated new, non-safety-related (NSR) piping, are non-seismic and are not protected from missiles generated from tornados or high wind events. If either of these external events were to occur, safe shutdown using the AFW system may be required. T-939 inventory may be lost due to a leak or damage to the tank or associated NSR piping. If pump P-8C is being utilized for safe shutdown, the design change hydraulic analysis (Reference EA-EC55441-01) shows that air ingestion into pump P-8C via the damaged piping or tank may occur when the water level in T- 2 drops to a level which is above the current low-low level trip setpoint where a backup water source would normally be established. In this case, a new operator action will be required to close the safety-related (SR) manual isolation valve MV-FW10024 located in a seismically qualified and tornado proof structure, upstream of check valves CK-FW0426 and CK-FW0427, to prevent air ingestion into P-8C. The hydraulic analysis also shows that the operation of P-8A and P-8B would be unaffected by this same damage to T-939 or the piping since there is no resultant air ingestion via the suction piping to P-8A/P-8B.

This new action will be included in Alarm and Response Procedure ARP-7. The new operator action will be performed while sufficient inventory in T-2 is still available to permit continued operation of P-8C to support safe shutdown decay heat removal using existing AFW water sources. However, to avoid coordination with which AFW pump is in service, closing manual isolation valve MV-FW10024 will be required regardless of which AFW pump is in service. Thus, the requirement to include a new operator action in ARP-7 to support the UFSAR described AFW design function adversely affects a design function and a method of performing or controlling an SSC design function.

In addition, an existing manual operator action is being modified to include a second step. To align the Fire Protection System (FPS) backup water supply to the suction supply of AFW Pumps P-8A and P-8B, manual valve MV-FW10002, "T-2 Cross Connect to T-939 Chk Bypass," must be opened. The valve must be opened to allow FPS flow a return path to T-2 to prevent lifting a relief valve (RV-0783) and overpressure on the P-8A and P-8B pump train. Emergency Operating Procedure EOP Supplement 31, "Supply AFW Pumps from Alternate Sources," has been revised to incorporate this change. The modified operator action has the potential for a more than minimal increase in the likelihood of a malfunction and requires evaluation.

Installation of CV-0790 to Prevent T-2 Equalization with T-939 and Overfill

In the existing plant design, T-2 could be overfilled following plant trip transients where main condenser hotwell level surges and rejects inventory to T-2 via the Condensate system. Currently, T-2 tank levels are not maintained at full capacity to allow for a surge volume to accommodate hotwell reject. However, the tank cross-connect modification has the potential to increase T-2 tank levels beyond the current capacity margin.

When the AFW pumps are running, all recirculation flow will return to T-2, and given the additional inventory available to the AFW and Condensate systems from T-939 due to the modification, condensate reject following a plant trip could overfill T-2 and potentially cause tank failure. To mitigate this risk, automatic control valve CV-0790 was installed in

the cross-connect piping to isolate the T-939 tank from the AFW system unless low T-2 levels are detected.

Though not credited to mitigate this event, T-2 high level alarms are provided and monitored as part of procedure SOP-12 and ARP-7 to alert Operators of the potential for T-2 overfill to occur if high level alarm LIA-2022-HI annunciates. Isolation of T-939, if needed, can be accomplished either by manually closing CV-0790, or via safety-related isolation valve MV-FW10024. Additionally, operators monitor T-2 and T-939 levels daily. Both ARP-7 and SOP-12 contain caution notes to check and isolate T-939 if T-2 levels begin trending upwards. The operator response to raising T-2 levels is unchanged from the existing response. An operator would be sent to troubleshoot the reason for T-2 level increase, which is not a time-critical action. Even if overfill were to occur, overfill can be accommodated by the vent and overflow line without challenging the integrity of T-2. The Failure Mode Effects Analysis (FMEA) performed as part of the engineering change concludes that there are no additional failures or effects of failures due to the installation of CV-0790. However, reliance on a non-safety related (NSR) control valve to isolate T-939 from the AFW system to prevent T-2 overfill adversely affects a design function and a method of performing or controlling a System, Structure, or Component (SSC) design function that must be assessed in a 50.59 evaluation.

Summary of 50.59 Evaluation:

Under the activity, sufficient AFW flow will continue to be available during anticipated operational occurrences and accident conditions. As a result, the AFW system will continue to perform as intended, such that the change does not affect the radiological consequences of an accident previously evaluated in the UFSAR or of a malfunction of an SSC important to safety previously evaluated in the UFSAR. The changes to the design of the AFW system and the means of ensuring adequate water supply from the condensate system to support the AFW design function do not introduce any new type of accident.

Since sufficient AFW flow will continue to be available during anticipated operational occurrences and accident conditions, the AFW system will continue to perform as intended, such that no fission product barriers are affected.

The activity does not adversely affect a method, or constitute a departure from, a method of evaluation that demonstrates intended design functions of an SSC will be accomplished as described in the UFSAR.

The two potentially adverse impacts to a UFSAR-described design function that require evaluation due to this design modification are addressed below:

AFW Operator Actions in Response to Seismic or Tornado/High Wind Event

The activity requires development of a new operator action to perform a manual isolation of the Demineralized Water Storage Tank, T-939, and piping, from the safety-related portions of the AFW system, given a seismic or tornado/high wind initiating event has already occurred that potentially damaged components external to plant structures. Passive failure of this equipment is not considered an initiating event in the UFSAR. Therefore, the activity does not result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the UFSAR.

The new operator action to close manual isolation valve MV-FW10024 will be developed in accordance with controlled procedures and Operator training. The action, following seismic or tornado/high wind-induced damage to T-939 and/or piping, can be performed with significant time available before P-8C begins to ingest air, and does not increase the likelihood of loss of the AFW system water supply from the credited Condensate Storage Tank T-2.

The new manual operator action to close manual valve MV-FW10024 preserves the existing design function of the AFW system for seismic and tornado/high wind events. Therefore, the activity does not create the possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the UFSAR.

The activity also requires modification of an existing operator action to prevent overpressurization of the P-8A and P-8B AFW pump train components. Following a potentially-damaging tornado, the suction source of P-8A or P-8B may be aligned to the Fire Protection System which has higher supply pressure than the normal static head available from T-2. The system is not normally aligned in this configuration and passive failure of this equipment is not considered an initiating event in the UFSAR. Therefore, the activity does not result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the UFSAR.

The modified action to open MV-FW10002 is developed in accordance with controlled procedures and Operator training. Following a tornado/high wind event that potentially damages T-2, the action can be performed in the required amount of time and does not result in more than a minimal increase in the likelihood of a malfunction of the AFW system.

Installation of CV-0790 to Prevent T-2 Equalization and Overfill

Installation of CV-0790 to prevent T-2 equalization and overfill is seismically evaluated via the Seismic Qualification User's Group (SQUG) process such that there is no more than a minimal chance of the valve to change state due to failure of the valve appurtenances (i.e., instrument tubing, pilot valves, etc.) during and after a seismic event. As a result, there is no more than a minimal chance of CV-0790 leak-by causing T-2 to overfill. Even if the valve were to fail open and overfill of T-2 were to occur, the vent and overflow lines have sufficient capacity for the overfill flow rate without challenging T-2 integrity. Therefore, the activity does not result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety previously evaluated in the UFSAR, nor does it create the possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the UFSAR.

10 CFR 50.59 Evaluation Log Number: 20-0058 R1

Document Number and Title:

Engineering Change (EC) 76687 revision 1 (R1), "V-24A/B/C/D Emergency Diesel Generator Room Ventilation Fans Modify Control Circuit to Resolve CR-PLP-2016-03456"

Description of Change:

EC 76687 R1 will add an "off-delay" time delay relay to the start circuitry for the emergency diesel generator room ventilation fans (V-24A, B, C, and D). The breakers for the ventilation fans had been tripping during normal fan operation. The problem has occurred when the ventilation fan control switch, "Hand/Standby/Auto", is manipulated while the fan is operating. The "Hand/Standby/Auto" control switch is a "break before make" configuration which will open the circuit for one position before closing the circuit for the next position. If both positions require the fan/motor to be running, then moving the switch from one position to the other will cause the fan/motor to go from on to off, and back to on, during the switch position change. The time delay relay will allow the motor to remain running during control switch position changes and either continue running or stop after the off-delay setting depending on whether or not the final switch position is in run or stop. Maintaining the fan running during control switch manipulation will prevent the large current transients that have caused the breaker tripping issue.

Installing the time delay relay has the potential to decrease the reliability of the fans, which are relied on to support accident mitigation. That is, the installation of an additional component, such as the time delay relay, which is required to operate for the fan to perform its design function, could affect the reliability of the fan, and therefore could involve an increase in the probability of a malfunction of a system or component important to safety previously evaluated in the UFSAR.

Revision 1 of the 50.59 evaluation incorporated the design change from an on-delay to an off-delay time delay relay due to the failure of the on-delay relays during bench testing. The revision also updated the 50.59 evaluation form to EN-LI-101, "10 CFR 50.59 Evaluations," revision 20.

Summary of 50.59 Evaluation:

The installation of the time delay relays will not result in a more than minimal increase in frequency of a malfunction. The time delay relays meet all applicable design, functional, and regulatory requirements, such as those in regulatory guides and Institute of Electrical and Electronics Engineers (IEEE) standards. Further, the time delay relays do not depart from the design, fabrication, construction, testing, and performance standards as outlined in the General Design Criteria (UFSAR Section 5.1).

In addition, installation of the time delay relays will not result in a more than a minimal increase in the frequency of occurrence of an accident, will not represent a more than minimal increase in accident or malfunction consequences, will not create the possibility of a different type of accident or malfunction with a different result, will not affect fission product barriers, and will not affect UFSAR-specified safety evaluation methodologies.

10 CFR 50.59 Evaluation Log Number: 20-0059 R1

Document Number and Title:

Engineering Change (EC) 76688 Revision 1 (R1), "V-27A/B/C/D Engineering Safeguards Room Ventilation Fans Modify Control Circuit to Resolve CR PLP 2016-03456"

Description of Change:

EC 76688 R1 will add an "off-delay" time delay relay to the start circuitry for the engineering safeguards room ventilation fans (V-27A, B, C, and D). The breakers for the ventilation fans had been tripping during normal fan operation. The problem has occurred when the ventilation fan control switch, "Hand/Standby/Auto", is manipulated while the fan is operating. The "Hand/Standby/Auto" control switch is a "break before make" configuration which will open the circuit for one position before closing the circuit for the next position. If both positions require the fan/motor to be running, then moving the switch from one position to the other will cause the fan/motor to go from on to off, and back to on, during the switch position change. The time delay relay will allow the motor to remain running during control switch position changes and either continue running or stop after the off-delay setting depending on whether or not the final switch position is in run or stop. Maintaining the fan running during control switch manipulation will prevent the large current transients that have caused the breaker tripping issue.

Installing the time delay relay had the potential to decrease the reliability of the fans, which are relied on to support accident mitigation. That is, the installation of an additional component, such as the time delay relay, which is required to operate for the fan to perform its design function, could affect the reliability of the fan, and therefore could involve an increase in the probability of a malfunction of a system or component important to safety previously evaluated in the UFSAR.

Revision 1 of the 50.59 evaluation incorporated the design change from an on-delay to an off-delay time delay relay due to the failure of the on-delay relays during bench testing. The revision also updated the 50.59 evaluation form to EN-LI-101, "10 CFR 50.59 Evaluations," revision 20.

Summary of 50.59 Evaluation:

The installation of the time delay relays will not result in a more than minimal increase in frequency of a malfunction. The time delay relays meet all applicable design, functional, and regulatory requirements, such as those in regulatory guides and IEEE standards. Further, the time delay relays do not depart from the design, fabrication, construction, testing, and performance standards as outlined in the General Design Criteria (UFSAR Section 5.1).

In addition, installation of the time delay relays will not result in a more than a minimal increase in the frequency of occurrence of an accident, will not represent a more than minimal increase in accident or malfunction consequences, will not create the possibility of a different type of accident or malfunction with a different result, will not affect fission product barriers, and will not affect UFSAR-specified safety evaluation methodologies.

10 CFR 50.59 Evaluation Log Number: 20-0118 R1

Document Number and Title:

Engineering Change (EC) 27518 revision 1 (R1), "Base EC to Replace MCC Breaker Buckets on MCC 1,2,7,8"

Description of Change:

EC-27518 evaluated replacement of 119 Motor Control Center (MCC) enclosures (buckets), in MCCs 1, 2, 7, and 8. The term breaker, when used in the following text, is meant to include both the enclosure and the breaker. Since resources are not available to replace all 119 breakers in a specific outage period the breakers are being replaced in groups over many years. To date 35 of the 119 breakers have been authorized for replacement.

The MCCs supply safety-related as well as augmented quality loads. Functionality of the components remains unchanged as the original components are being replaced with like components except for new interposing relays being installed for each contactor coil, and the addition of fuses on the primary side of the replaced control power transformers for NEMA Size 3 and larger starters. Components being replaced include the breaker, breaker enclosure, enclosure door, and other components located within the MCC enclosure. Other components replaced may include any or all of the following: circuit breaker with operating handle, contactor, thermal overload relay and heater with reset, fuses and fuse blocks, transformers, terminal blocks, relays, and associated wiring and mounting hardware.

The purpose of the EC is to improve the reliability of aging equipment in MCCs and improve voltage margins on the 480V system and 120V motor control circuits.

The breakers impacted by Revision 1 of EC 27518 as changed by field change request (FCR) FCR73233 supply the loads listed in the below table:

Note: EC27518 Revision 0 authorized replacing 20 of the 119 breakers. Revision 1 to EC 27518 authorized replacing an additional 15 breakers after the scope was reduced from 25 breakers by FCR73233.

Breaker No.	Load Supplied	System
Added by Revision 1		
52-123	Fuel Oil Transfer Pump P-18B	FOS
52-127	Boric Acid Gravity Feed Stop Valve MO-2169	CVC
52-131	Engineered Safeguards Room Cooler V-27A	ESV
52-167	Primary Loop S.D. Cooling Valve MO-3015	SDC
52-171	Shield Cooling Pump #2 P-77B	SCS
52-173	SIRW Tank Recirculation Pump P-74	SSS
52-187	Boric Acid Gravity Feed Stop Valve MO-2170	CVC
52-207	SIRW to Charging Pumps MO-2160	CVC

Breaker No.	Load Supplied	System
52-217	Charging Pump Discharge to Redundant HPSI Header Stop Valve MO-3072	HPI
52-221	Engineered Safeguards Room Cooler V-27D	ESV
52-717	Spent Fuel Pool Cooling Pump P-51A	SFP
52-723	Fuel Handling Area Supply Fan V-7	VAS
52-727	Degasifier Pump P-68A	RWS
52-729	Fuel Handling Area Exhaust Fan V-8A	VAS
52-823	Degasifier Pump P-68B	RWS

Note: CVC = Chemical & Volume Control; ESV = Engineered Safeguards Room HVAC; FOS = Fuel Oil System; HPI = High Pressure Safety Injection; RWS = Radwaste System; SCS = Shield Cooling System; SFP = Spent Fuel Pool Cooling; SSS = Safety Injection & Refueling Water (SIRW)/Containment Sump Suction; VAS = Heating, Ventilation, & Air-Conditioning System; SDC = Shutdown Cooling System

The above listed systems include safety-related systems that are required to mitigate an accident and/or transient, however, not all of the listed components are needed for the systems to achieve their safety functions.

The changes implemented by EC 27518 that resulted in a 10 CFR 50.59 evaluation being required are:

1. Addition of control power transformer fuses for Size 3 and larger starters.
2. Addition of interposing relays for contactors.

The addition of control power transformer fuses and interposing relays represent additional potential failure points in systems important to safety which must be evaluated (ref: Example 1 in Section 4.3.2 of NEI 96-07, Revision 1). Where appropriate, specific breakers and/or loads were evaluated on an individual basis against the 50.59 evaluation questions. The remaining breakers were evaluated against the 50.59 evaluation questions generically as a group.

Summary of 50.59 Evaluation:

The changes being implemented by EC 27518 represent a not more than minimal increase in frequency of accidents or malfunctions, represent a not a more than minimal increase in accident or malfunction consequences, do not create the possibility of a different type of accident or malfunction with a difference result, do not affect fission product barriers, and do not affect UFSAR specified safety evaluation methodologies. Moreover,

- this activity does not change any of the design requirements for the mechanical systems supported by the electrical distribution system components being replaced and it does not impact the redundancy, diversity, or separation of the electrical or mechanical systems,
- no manual actions are added, deleted, or have had impacts to their time margins for completion,

- no automatic actions are added or deleted, but the addition of an interposing relay for a contactor will require a new relay to be energized before the contactor is able to supply the load,
- this activity does not modify fission product barriers, design basis limits for fission product barriers, or any accident parameters (including pressures and temperatures) or results, and
- no conditions which could exceed design limits of any SSC are created.

Therefore, the activity can be implemented without obtaining a License Amendment.

Enclosure 2 to

PNP 2021-012

Palisades Nuclear Plant, Commitment Change Summary Report

PALISADES NUCLEAR PLANT, COMMITMENT CHANGE SUMMARY REPORT

COMMITMENT NUMBER	LETTER TITLE AND DATE OF ORIGINAL COMMITMENT	CHANGED DATE	DESCRIPTION
2011164	Nuclear Regulatory Commission Bulletin 2003-01: "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors – 60-Day Response," dated August 5, 2003	4/28/2021	<p>Original Commitment: NMC will revise a plant off normal procedure (ONP) to lower the entry conditions from the current Technical Specification value of 1 gallon per minute (gpm) unidentified leakage to 0.15 gpm unidentified leakage. The reactor trip value in the ONP will also be lowered from 20 gpm leakage to 10 gpm unidentified leakage. This procedure revision will be implemented by January 31, 2004.</p> <p>Revised Commitment: Entergy will revise a plant abnormal operating procedure (AOP) to lower the entry conditions from the current Technical Specification value of 1 gallon per minute (gpm) unidentified leakage to 0.3 gpm unidentified leakage. The reactor trip value in the AOP will also be lowered from 20 gpm leakage to 10 gpm unidentified leakage.</p> <p>Justification: Given the subsequent plant physical and procedure changes to address the containment sump blockage issue (summarized in UFSAR Section 6.1) and improved industry knowledge with respect to understanding an appropriate response to various levels of PCS leakage that has occurred since 2003; the change to increase the AOP-23 entry condition from >0.15 gpm to >0.3 gpm does not result in increased risk of containment sump screen plugging or any other adverse impact on the plant design basis. The 0.3 gpm leak rate has a basis for actions developed per industry guidelines as incorporated in the current plant PCS Leak Rate Monitoring Program (ADMIN 4.19) and remains conservative compared to similar plant designs. Overall, the change still provides a significant safety factor to the TS 3.4.13 limit of 1.0 gpm.</p>