

August 24, 2001

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

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT**  
**REQUEST FOR NRC APPROVAL OF REVISION TO REACTOR VESSEL**  
**SURVEILLANCE COUPON REMOVAL SCHEDULE**

Pursuant to 10 CFR 50, Appendix H, III.B.3, the NRC has approved the schedule for removal of the Palisades reactor vessel surveillance capsules as listed in Table 4-20 of the Palisades Updated Final Safety Analysis Report. Surveillance capsules W-100 and T-150 are scheduled for removal following the current operating cycle. The next refueling outage is presently scheduled to begin September 20, 2002.

Surveillance capsule W-100 is located in the reactor vessel beltline region adjacent to the reactor vessel wall and when removed and tested following Cycle 16, will provide material property results equivalent to those anticipated at the reactor vessel inner diameter at plant end-of-license (March 24, 2011).

Surveillance capsule T-150 is located in the reactor vessel above the active region of the core adjacent to the reactor vessel wall. If removed and tested following Cycle 16, the capsule is expected to provide material property results for the reactor vessel beltline representative only of the thermal effect of reactor operation (less the neutron fluence effect) through the end of Cycle 16 (September 20, 2002).

It is requested that NRC approve a revision to the surveillance capsule removal schedule, such that only surveillance capsule W-100 will be removed following Cycle 16. It is additionally requested that surveillance capsule T-150 be placed in reserve without a defined removal time. This change is requested because:


1. We are presently unaware of a clearly defined method that would allow the results from testing capsule T-150 to be used to remove the thermal effect from the total effect observed by the materials in the surveillance capsules removed from the beltline region (e.g., W-100).

2. If these thermal properties are required at some future date, more relevant information would be acquired from a capsule that has accumulated the thermal effect throughout the entire period of interest, rather than just the first 16 operating cycles.
3. If additional irradiated information is desired for the surveillance materials in capsule T-150, it could be relocated to a wall or accelerated surveillance location in the beltline region.

Approval of this proposed change in accordance with 10 CFR 50, Appendix H, III.C.3 is requested no later than February 28, 2002 to allow for appropriate pre-outage planning.

#### SUMMARY OF COMMITMENTS

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



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