

December 23, 2004

Mr. Daniel J. Malone
Site Vice President
Palisades Nuclear Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR POWER PLANT - APPROVAL TO USE MORE
RECENT SNUBBER EXAMINATION AND TESTING REQUIREMENTS
(TAC NO. MC2717)

Dear Mr. Malone:

By letter dated April 6, 2004, Nuclear Management Company, LLC (NMC, the licensee) submitted a request for relief for the approval to use a portion of a more recent edition and addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for testing and examination of dynamic restraints (snubbers) in the Palisades Nuclear Power Plant. The applicable Code of record for the inservice and examination of snubbers at Palisades Nuclear Power Plant is the 1989 Edition of the ASME *Boiler and Pressure Vessel Code*, Section XI, Subsection IWF-5000. The 1989 ASME Code, Section XI states in part that "Inservice examinations shall be performed in accordance with the first addenda to the ASME/ANSI OM-1987, Part 4." The licensee requested approval to use the 1995 Edition up to and including the 1996 Addenda of the ASME OM Code, Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light Water Reactor Power Plants" for the remainder of its third 10-year inservice testing (IST) interval.

The U.S. Nuclear Regulatory Commission (NRC) staff, has reviewed and evaluated the information provided in the relief request. The regulation in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50, Part 50.55a(g)(4)(iv) states that inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in 10 CFR 50.55a(b), subject to NRC approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met. The 1995 Edition and 1996 Addenda to the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b) on September 22, 1999, (64 FR 51370). It should be noted that in this amended rulemaking, a modification was added in 10 CFR 50.55a(b)(3)(v) to allow the use of Subsection ISTD in lieu of the requirements for snubbers in Section XI, IWF-5200 (a) and (b) and IWF-5300 (a) and (b) by making appropriate changes to the technical specifications or licensee-controlled documents.

D. Malone

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Therefore, no specific approval is required by the NRC, and the licensee may use the 1995 Edition up to and including the 1996 Addenda of the ASME OM Code, Subsection ISTD for the remainder of its 10-year IST interval.

If you have any questions regarding this issue, please contact Mr. David H. Jaffe at 301-415-1439 or by e-mail at dhj@nrc.gov.

Sincerely,

/RA/

Margaret A. Kotzalas, Acting Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

cc: See next page

D. Malone

-2-

Therefore, no specific approval is required by the NRC, and the licensee may use the 1995 Edition up to and including the 1996 Addenda of the ASME OM Code, Subsection ISTD for the remainder of its 10-year IST interval.

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Sincerely,

/RA/

Margaret A. Kotzalas, Acting Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

cc: See next page

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October 2003