

November 22, 2005

10 CFR 50.55a

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

Palisades Nuclear Power Plant  
Docket 50-255  
License No. DPR-20

Response to Request for Additional Information on Request for Relief from ASME  
Section XI Code Requirements for Repair of Pressurizer Nozzle Penetrations

By letter dated July 22, 2005, Nuclear Management Company, LLC (NMC) requested Nuclear Regulatory Commission (NRC) approval, pursuant to 10 CFR 50.55a(a)(3)(i), for the use of an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, related to the repair of pressurizer heater sleeve penetrations at the Palisades Nuclear Plant (PNP). The specific request was to use Code Case N-638, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine Temper Bead Technique," with three exceptions.

Subsequent to NMC submitting the request, Code Case N-638-1, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine Temper Bead Technique," was conditionally approved per Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability – ASME Section XI Division 1," Revision 14, dated August 2005. Due to this conditional approval of Code Case N-638-1, NMC no longer needs approval for exception #1 and exception #3, as described in the July 22, 2005 request.

By letter dated October 28, 2005, the NRC issued a request for additional information (RAI) on the subject relief request. Enclosure 1 provides the NMC response for PNP.

Summary of Commitments

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



Paul A. Harden  
Site Vice President, Palisades Nuclear Plant  
Nuclear Management Company, LLC

Enclosure (1)

CC Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC

**ENCLOSURE 1**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**  
**PALISADES NUCLEAR PLANT**

**NRC Request**

1. *Item 6, "Duration of Proposed Alternative," on page 4 of Enclosure 1 to Nuclear Management Company's (NMC's) letter dated July 22, 2005, says "NMC requests approval of the proposed alternative for the remainder of the third ten-year interval of the Inservice Inspection Program for the Palisades Nuclear Plant, which will conclude on or before December 12, 2006." Please state the outage date, and the specific conditions for using this relief request (such as shown in Attachment 1 to the relief request). All other requests for relief shall be made on a case-by-case basis.*

**NMC Response**

1. Nuclear Management Company, LLC (NMC) will use the proposed alternative during the Spring 2006 outage at Palisades Nuclear Plant (PNP) for the proposed repair of the pressurizer heater sleeve penetrations, as shown in Attachment 1 of the July 22, 2005 relief request.

**NRC Request**

2. *On page 4 of its relief request, NMC took exception to the ultrasonic testing acceptance criteria shown in code case N-638, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine [Gas Tungsten Arc Welding] GTAW Temper Bead Technique." NMC proposed using the acceptance standard for ultrasonic testing shown in BN-5244(a) of the 1992 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section III. Code Case N-638-1 has been conditionally accepted by the Nuclear Regulatory Commission (NRC) in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 14, dated August 2005. The condition NRC has placed on this Code Case is that "UT examinations shall be demonstrated for the repair volume using representative samples which contain construction type flaws. The acceptance criteria of NB-5330 of Section III edition and addenda approved in 10 CFR 50.55a apply to all flaws identified within the repaired volume." The staff expects NMC to comply with the acceptance criteria shown in the regulatory guide for Code Case N-638-1. Please modify your submittal to indicate that you will use the acceptance criteria in Regulatory Guide 1.147 for Code Case N-638-1.*

**NMC Response**

2. NMC will comply with the ultrasonic acceptance criteria shown in Regulatory Guide 1.147 for Code Case N-638-1 at PNP. The 1992 Edition of ASME Section III, NB-5330 will be used.