

March 20, 2006

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

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

Commitment Change: Steam Generator Tubesheet Inspection Depth

By letter dated October 29, 2004, Nuclear Management Company, LLC (NMC) responded to Generic Letter 2004-01, "Requirements for Steam Generator Tube Inspections," for Palisades Nuclear Plant (PNP). The letter contained the following commitments:

NMC will submit a license amendment request, which limits the depth of inspection in the tubesheet, 90 days after the NRC approves a methodology applicable to the Palisades Nuclear Plant.

NMC will perform a full tubesheet inspection with the +Point™ probe or equivalent on at least 3% of the active steam generator tubes on the hot leg side until a license amendment request is approved for the Palisades Nuclear Plant.

By letter dated August 22, 2005, NMC responded to a request for additional information (RAI) on NMC's response to Generic Letter (GL) 2004-01, for PNP. In the letter, the following commitment was revised:

Commitment made by letter dated October 29, 2004:

NMC will submit a license amendment request, which limits the depth of inspection in the tubesheet, 90 days after the NRC approves a methodology applicable to the Palisades Nuclear Plant.

Revised commitment:

NMC will use the methodology in WCAP-16208-P to determine steam generator tubesheet inspections to be included in the surveillance program requirements starting in the 2007 refueling outage.

A teleconference was held with the NRC staff on March 14, 2006, to discuss changes to the above commitments. Based on these discussions, NMC is revising the above commitments by replacing them with a commitment to implement WCAP-16208-P, "NDE Inspection Length for CE Steam Generator Tubesheet Region Explosive Expansions," in the 2006 refueling outage at PNP. The NRC staff noted recent RAIs on WCAP-16208-P that could potentially affect the inspection depth into the tubesheet, namely the issue of T-hot effect and the use of first slip loads. NMC agreed to address these issues in regards to determining the 2006 refueling outage tubesheet inspection depth. NMC also agreed to submit a license amendment request to include WCAP-16208-P in the surveillance program requirements of the Steam Generator Program.

Summary of Commitments

This letter contains one new commitment and one revision to existing commitments.

One new commitment follows:

NMC will submit a license amendment request to include WCAP-16208-P in the surveillance program requirements of the Steam Generator Program by May 31, 2006.

Current commitments to be revised:

NMC will perform a full tubesheet inspection with the +Point™ probe or equivalent on at least 3% of the active steam generator tubes on the hot leg side until a license amendment request is approved for the Palisades Nuclear Plant.

NMC will use the methodology in WCAP-16208-P to determine steam generator tubesheet inspections to be included in the surveillance program requirements starting in the 2007 refueling outage.

Revised commitment:

NMC will use the methodology in WCAP-16208-P to determine the steam generator tubesheet inspection depth to be implemented during the 2006 refueling outage. The issues of T-hot effect and use of slip loads will be included in determining the appropriate tubesheet inspection depth at PNP.



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

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