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PNP 2014-073

July 30, 2014

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

SUBJECT: Palisades Nuclear Plant Supplemental Response to NRC Request  
for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding  
Aspects of Recommendations 2.3 of the Near-Term Task Force  
Review of Insights from the Fukushima Dai-ichi Accident

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

- REFERENCES:
1. NRC letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012 (Adams Accession No. ML12056A046)
  2. Entergy Nuclear Operations, Inc. letter, PNP 2012-101, *Flooding Walkdown Report - Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated November 27, 2012 (Adams Accession No. ML12332A377)

Dear Sir or Madam:

On March 12, 2012, the NRC issued Reference 1 to all power reactor licensees. Enclosure 4 of Reference 1 requested that each licensee perform flood protection walkdowns and report the results within 180 days of NRC endorsement of the flooding walkdown procedure (NEI 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features"). Entergy Nuclear Operations, Inc. (ENO) completed the flood protection walkdowns at the Palisades Nuclear Plant and submitted the results in Reference 2. Reference 2 contained open items where restricted access prevented walkdown of certain flood protection features. Walkdowns of the restricted access

items were completed by June 1, 2014, as committed, and this letter provides the results. This submittal closes the open items in Reference 2.

The attached table provides a list of the restricted access items inspected, their respective disposition, and any action planned or taken. As a result of the inspections:

- There were no additional deficiencies found in the supplemental walkdowns.
- No temporary measures were required as a result of the completed inspections.
- Available Physical Margin information was collected and documented in the walkdown record forms for each applicable item inspected in accordance with NEI 12-07.
- One of the restricted access items was reclassified as Inaccessible.

#### Summary of Commitments

This letter contains no new or revised commitments. It completes the following commitment made in Reference 2:

“ENO will perform walkdowns for equipment that could not be inspected as identified in Section 7.4 of the Flooding Walkdown Submittal Report.”

This commitment was a one-time action with a scheduled completion date of June 1, 2014.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 30, 2014.

Sincerely,



ajv/jse

Attachment: Flooding Walkdown Report Open Items

cc: Director of Office of Nuclear Regulation  
Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC

**Attachment**

**Flooding Walkdown Report Open Items**

One Page Follows

### Flooding Walkdown Report Open Items

Description of Feature	Deficiency? (yes/no)	Deficiency Description	Actions Taken or Planned	Inaccessible? (yes/no, if yes, explain below)
Diesel Generator 1-1 Floor Drain Backwater Valve	No	None	None	No
Diesel Generator 1-2 Floor Drain Backwater Valve	No	None	None	No
Electrical conduit A026 seal in Manhole #3 within 1C switchgear room. This conduit feeds the motor driven auxiliary feedwater pump in the auxiliary feedwater pump room.	No	None	None	Yes  The conduit seal is located deep into the conduit and could not be visually inspected or inspected with a boroscope. Inspection would require removal of power cables for auxiliary feedwater pump P-8A within the conduit and significant disassembly of the conduit. See evaluation below.

#### **Evaluation of Electrical Conduit A026**

NEI 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," requires in Section 5.1 that inaccessible items shall be identified and justification provided that there is reasonable assurance that the feature is available and will perform the external flood protection or mitigation function for the full duration of the flood condition.

The evaluation of the inaccessible electrical conduit A026 included a review of plant documentation for this seal which verified that the seal is installed and properly designed. The evaluation concluded that there is reasonable assurance that the seal is available and will perform its external flood mitigation function for the full duration of the flood condition.