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PNP 2014-081

August 14, 2014

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

SUBJECT: Response to Fourth Request for Additional Information – Reactor Vessel Internals (ME9569)

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

- REFERENCES:**
1. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2012-009, "Revised Program Plan for Aging Management of Reactor Vessel Internals," September 13, 2012 (ADAMS Accession Number ML12257A352)
 2. NRC e-mail, "Palisades – Request for Additional Information – ME9569 - Revised Program Plan for Aging Management of Reactor Vessel Internals," March 04, 2013 (ADAMS Accession Number ML13063A318)
 3. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2013-022, "Response to Request for Additional Information – Revised Program Plan for Aging Management of Reactor Vessel Internals," April 04, 2013 (ADAMS Accession Number ML13094A414)
 4. NRC e-mail, "Palisades – Request for Additional Information – Reactor Vessel Internals - ME9569 – Email Resend," December 12, 2013 (ADAMS Accession Number ML13346A644)
 5. Entergy Nuclear Operations, Inc. letter to NRC, "Summary of January 2, 2014 Teleconference with Nuclear Regulatory Staff on Palisades - Request for Additional Information – Reactor Vessel Internals – ME9569 Response Schedule," January 07, 2014 (ADAMS Accession Number ML14007A151)
 6. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2014-001, "Response to Second Request for Additional Information - Reactor Vessel Internals – ME9569," April 03, 2014 (ADAMS Accession Number ML14097A376)
 7. NRC e-mail, "Request for Additional Information - Palisades – Aging Management Program for Reactor Vessel Internals - ME9569," June 09, 2014 (ADAMS Accession Number ML14160B264)

8. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2014-067, "Response to Third Request for Additional Information – Reactor Vessel Internals (ME9569)," July 01, 2014 (ADAMS Accession Number ML14183A014)
9. NRC e-mail, "Request for Additional Information: Palisades Aging Management Program for Reactor Vessel Internals (ME9569)," August 01, 2014

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted to the Nuclear Regulatory Commission (NRC) a revised program plan for aging management of reactor vessel internals.

In Reference 2, the NRC issued a request for additional information (RAI). ENO responded to the RAI in Reference 3.

In Reference 4, the NRC issued a second RAI with a 30-day required response. In Reference 5, ENO documented a teleconference during which the NRC accepted a request to extend the second RAI response from 30 days to 120 days. ENO responded to the second RAI in Reference 6.

In Reference 7, the NRC issued a third RAI with a 30-day required response. ENO responded to the third RAI in Reference 8.

In Reference 9, the NRC issued a fourth RAI with a 30-day required response.

The response to the fourth RAI is provided in the attachment.

This submittal contains no proprietary information.

This submittal contains no new or revised commitments.

Sincerely,



jah/jse

Attachment: Response to Fourth Request for Additional Information for Reactor Vessel Internals (ME9569)

cc: Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

ATTACHMENT

Response to Fourth Request for Additional Information for Reactor Vessel Internals (ME9569)

By letter dated September 13, 2012, Entergy Nuclear Operations, Inc. (ENO) submitted to the Nuclear Regulatory Commission (NRC) a revised program plan for aging management of reactor vessel internals at Palisades Nuclear Plant (PNP). By electronic mail, dated August 01, 2014, the NRC issued a fourth request for additional information (RAI) concerning the program plan. The requested information is provided below.

1. NRC Information Request – RAI-4.1

Please confirm that the weld joining the very bottom of the core support barrel to the plate that forms the bottom of the lower core support structure (Figure B), is considered a “Core Support Barrel Lower Girth Weld,” at PNP and is subject to EVT-1 visual examination as a “Primary” inspection category component.

ENO Response

The weld joining the bottom of the core support barrel to the plate that forms the bottom of the lower core support structure is considered a “Core Support Barrel Lower Girth Weld” at PNP, and is subject to EVT-1 visual examination as a “Primary” inspection category component.

As discussed in the RAI, Figure 14, “Palisades Reactor Vessel Internals Inspection Plan,” of Reference 1 shows an elevation cross section of the PNP core support barrel and has four circled areas corresponding to portions to be inspected. The figure caption states the following:

Primary: EVT-1 examination of core of upper flange weld and lower cylinder girth welds no later than 2 RFOs [refueling outages] from the beginning of the LR [license renewal] period (ten year intervals)

Coverage: 100% of accessible surfaces of upper flange weld and lower cylinder girth welds

The lower-most weld circled in the figure is the weld that joins the bottom of the core support barrel to the plate that forms the bottom of the lower core support structure. This weld is considered to be a “Core Support Barrel Lower Girth Weld” and is subject to EVT-1 visual examination as a “Primary” inspection category component.

2. NRC Information Request – RAI-4.2

Please confirm that Entergy Nuclear Operations, Inc. understands there to be an error in MRP-227-A, Tables 4-2 and 4-5 in that both the “Core Support Barrel Lower Flange Weld,” and “Core Support Barrel Lower Core Barrel Flange,” should have been identified as not applicable to PNP.

ENO Response

ENO understands that there is an error in MRP-227-A, "Pressurized Water Reactor (PWR) Internals Inspection and Evaluation Guidelines" (Reference 2), Tables 4-2, "CE plants Primary components," and 4-5, "CE plants Expansion components." In these two tables, the "Core Support Barrel Assembly, Lower flange weld" and the "Core Support Barrel Assembly, Lower core barrel flange" should have been identified as not applicable to PNP. This error has been documented in the PNP corrective action program.

References

1. Palisades Nuclear Plant, "Revised Program Plan for Aging Management of Reactor Vessel Internals," dated September 13, 2012 (ADAMS Accession No. ML12257A352)
2. Electrical Power Research Institute, "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227-A)," 1022863, dated December 2011.