

## PalisadesAppGNPEm Resource

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**Sent:** Wednesday, January 28, 2015 1:15 PM  
**To:** RidsRgn3MailCenter Resource; Rankin, Jennivine; Nguyen, April; Garmoe, Alex; yalek@michigan.gov  
**Cc:** ERICKSON, JEFFREY S; REYNA, MARY S  
**Subject:** Response to RAI for Palisades Equivalent Margins Analysis 012815  
**Attachments:** Response to RAI for Palisades Equivalent Margins Analysis 012815.pdf

Attached is a document submitted electronically to the NRC on January 28, 2015.

Subject: "Response to Request for Additional Information Regarding the License Amendment Request for Approval of Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margins Analysis"

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**Subject:** Response to RAI for Palisades Equivalent Margins Analysis 012815  
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**Received Date:** 1/28/2015 1:15:42 PM  
**From:** REYNA, MARY S

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**Recipients Received:**



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PNP 2015-002

January 28, 2015

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

SUBJECT: Response to Request for Additional Information Regarding the License  
Amendment Request for Approval of Palisades Nuclear Plant  
10 CFR 50 Appendix G Equivalent Margins Analysis

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

- REFERENCES: 1. Palisades Nuclear Plant, *Application for Renewed Operating License*, dated March 22, 2005 (ADAMS Accession No. ML050940446).
2. Entergy Nuclear Operations, Inc. letter PNP 2014-099, *License Amendment Request for Approval of Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margins Analysis*, dated November 12, 2014 (ADAMS Accession No. ML14316A370).
3. NRC letter, *Palisades Nuclear Plant – Request for Additional Information Regarding the License Amendment for an Equivalent Margin Analysis Completed in Accordance with 10 CFR 50, Appendix G (TAC NO. MF5163)*, dated January 15, 2015 (ADAMS Accession No. ML15012A305).

Dear Sir or Madam:

In the Palisades Nuclear Plant (PNP) license renewal application (Reference 1), Nuclear Management Company (NMC), the former license holder for PNP, committed to submit an equivalent margins analysis (EMA) for Nuclear Regulatory Commission (NRC) approval in accordance with 10 CFR 50 Appendix G, Section IV, "Fracture Toughness Requirements."

In Reference 2, ENO submitted an amendment application for the PNP operating license pursuant to 10 CFR 50.90 requesting approval of an EMA completed in accordance with 10 CFR 50 Appendix G, Section IV.

In Reference 3, ENO received a request for additional information (RAI) concerning the license amendment request.

The ENO response to the RAI is provided in Attachment 1.

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

In accordance with 10 CFR 50.91(b), a copy of this application, with the attachment, is being provided to the designated State of Michigan official.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 28, 2015.

Sincerely,



ajv/jse

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Attachment: 1. Response to Request for Additional Information Regarding the License Amendment Request for Approval of Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margins Analysis

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

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## **Attachment 1**

### **Response to Request for Additional Information Regarding the License Amendment Request for Approval of Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margins Analysis**

By letter dated November 12, 2014, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request for the Palisades Nuclear Plant (PNP) operating license pursuant to 10 CFR 50.90 regarding an equivalent margins analysis (EMA) completed in accordance with 10 CFR 50 Appendix G, Section IV (ADAMS Accession No. ML14316A370).

By letter dated January 15, 2015, the Nuclear Regulatory Commission (NRC) issued a request for additional information (RAI) concerning the license amendment request (ADAMS Accession No. ML15012A305).

The requested information is provided below.

#### **1. NRC Information Request – RAI #1**

*10 CFR 50.90 states that an application for an amendment to a license must fully describe the desired changes. Please describe any sections of the Updated Final Safety Analysis Report that are affected, and any changes to those sections, that result from this proposed license amendment relating to the Appendix G equivalent margin analysis.*

#### **ENO Response**

The proposed license amendment would support a change to the PNP Updated Final Safety Analysis Report (UFSAR) by incorporating the EMA analysis required by 10 CFR 50 Appendix G, Section IV. UFSAR Section 1.9.2.1, "Reactor Vessel Neutron Embrittlement," which discusses 10 CFR 50 Appendix G fracture toughness requirements, would be updated to discuss the EMA submittal and the approved license amendment. In UFSAR Table 1-6, "Estimated USE on March 24, 2031," the upper shelf energy (USE) values for extended beltline materials would be added. UFSAR Section 4.5.3, "Surveillance Program," which discusses 10 CFR 50 Appendix G fracture toughness requirements, would be updated to discuss the EMA submittal and the approved license amendment. Lastly, the list of references for UFSAR Chapters 1 and 4 would be updated to include the EMA submittal and the approved license amendment.