



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043
Tel 269 764 2000

Jeffery A. Hardy
Regulatory Assurance Manager

PNP 2015-058

August 3, 2015

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

SUBJECT: Technical Specification Required Report
 Palisades Nuclear Plant
 Docket 50-255
 License No. DPR-20

REFERENCE: Palisades Technical Specification 5.6, Reporting Requirements

Dear Sir or Madam:

Palisades Technical Specification, Section 5.6.6, Post Accident Monitoring Report, requires a report be submitted to the Nuclear Regulatory Commission within 14 days when a post-accident monitoring instrument, required by Technical Specification 3.3.7, Post Accident Monitoring Instrumentation, is not restored to operable status within 30 days.

Containment Level Indicating Transmitter, LIT-0446B, required by Technical Specification 3.3.7, has been inoperable for greater than 30 days. Per Technical Specification 5.6.6, the attached report outlines the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channel to operable status.

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

Sincerely,

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Attachment: Technical Specification Required Report for Inoperable Containment Level
 Indicating Transmitter, LIT-0446B

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

ATTACHMENT 1

TECHNICAL SPECIFICATION REQUIRED REPORT FOR INOPERABLE CONTAINMENT LEVEL INDICATING TRANSMITTER, LIT-0446B

BACKGROUND

LIT-0446B, Containment Level Indicating Transmitter, was declared inoperable on June 21, 2015, after failing to meet Technical Specification surveillance test acceptance criteria.

PREPLANNED ALTERNATE METHOD OF MONITORING

LIT-0446B is not modeled in PRA, nor is it credited in FSAR Chapter 14 accident analysis. It is primarily used to confirm safety functions are satisfied.

The redundant train, LIT-0446A, Containment Level Indicating Transmitter, is used as the primary alternate method for monitoring post-accident containment water level. In case of a loss of the alternate containment floor level indicator, alternate means exist to monitor for potential inadequate suction head for the High Pressure Injection pumps / Containment Spray pumps, post-RAS (Recirculation Actuation Signal). These indications are contained in Emergency Operating Procedure (EOP) Supplement 42, Section 4.0. In addition, there are two narrow range containment sump level indicators that provide sump level and trend up to the floor level.

CAUSE OF INSTRUMENT INOPERABILITY

The cause for inoperability of LIT-0446B was determined to be the failure of an electrolytic capacitor within the transmitter's converter module.

The most likely cause of the electrolytic capacitor failure was due to age. LIT-0446B had been in-service for greater than ten years.

PLANS AND SCHEDULE FOR RESTORING INSTRUMENT OPERABILITY

A qualified equivalent replacement for the failed electrolytic capacitor has been received and is currently being installed. Following successful post-maintenance testing, LIT-0446B will be declared operable.