

## **NRR-PMDAPEm Resource**

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**From:** Jackson, Diane  
**Sent:** Wednesday, August 12, 2015 2:57 PM  
**To:** Shams, Mohamed  
**Cc:** DiFrancesco, Nicholas; Wyman, Stephen; Spence, Jane; Devlin-Gill, Stephanie; Roche, Kevin; Yee, On; Patterson, Malcolm; Hoang, Dan; Le, Tuan; Heeszel, David; 50.54f\_Seismic Resource; RidsNroDsea Resource; Rivera-Lugo, Richard  
**Subject:** PALISADES NUCLEAR POWER PLANT - TECHNICAL REVIEW CHECKLIST RELATED TO INTERIM ESEP SUPPORTING IMPLEMENTATION OF NTTF R2.1, SEISMIC (TAC NO. MF5258)  
**Attachments:** Palisades R2.1 Seismic ESEP Staff Review.docx

August 12, 2015

MEMORANDUM TO: Mohamed K. Shams, Chief  
Hazards Management Branch (JHMB)  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

FROM: Diane T. Jackson, Chief  
Geosciences and Geotechnical Engineering Branch 2 (RGS2)  
Division of Site Safety and Environmental Analysis  
Office of New Reactors

SUBJECT: PALISADES NUCLEAR POWER PLANT, UNIT 1 - TECHNICAL REVIEW CHECKLIST RELATED TO INTERIM EXPEDITED SEISMIC EVALUATION PROCESS SUPPORTING IMPLEMENTATION OF NTTF RECOMMENDATION 2.1, SEISMIC, RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NO. MF5258)

The NRC technical staff working through the Geosciences and Geotechnical Engineering Branches 1 and 2 (RGS1 and RGS2) completed the Technical Review Checklist of the PALISADES NUCLEAR POWER PLANT, UNIT 1 response to Enclosure 1, Item (6) of the March 12, 2012, request for information letter issued per Title 10 of the Code of Federal Regulations, Subpart 50.54(f), to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to Fukushima Near-Term Task Force (NTTF) Recommendation 2.1: Seismic which implements lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. This addresses the staff review of the interim Expedited Seismic Evaluation Process (ESEP) report in response to Requested Item (6) of Enclosure 1, "Recommendation 2.1: Seismic," of the 50.54(f) letter. Attached is a file containing the technical review checklist to prepare a response letter to the licensee.

The NRC staff reviewed the information provided and, as documented in the enclosed staff checklist, determined that sufficient information was provided to be responsive to this portion of the Enclosure 1 of the 50.54(f) letter. The application of this staff review is limited to the interim ESEP as part of NTTF R2.1: Seismic activities.

This electronic memo constitutes the DSEA concurrence provided that only editorial changes are made to the staff assessment that would not affect the technical conclusions or technical context of the assessment.

This concludes the NRC's efforts associated with TAC NO. MF5258 for the review of the interim ESEP report for the PALISADES NUCLEAR POWER PLANT, UNIT 1.

Docket No: 50-255

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RELATED TO INTERIM ESEP SUPPORTING IMPLEMENTATION OF NTTF R2.1, SEISMIC (TAC NO.  
MF5258)

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TECHNICAL REVIEW CHECKLIST  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO EXPEDITED SEISMIC EVALUATION PROCESS INTERIM EVALUATION  
IMPLEMENTING NTTF RECOMMENDATION 2.1 SEISMIC  
PALISADES NUCLEAR PLANT, UNIT 1  
DOCKET NO. 050-255

By letter dated March 12, 2012 (USNRC, 2012a), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) "Conditions of License" (hereafter referred to as the "50.54(f) letter"). Enclosure 1 of the 50.54(f) letter requests addressees to reevaluate the seismic hazard at their site using present-day methods and guidance for licensing new nuclear power plants, and identify actions to address or modify, as necessary, plant components affected with the reevaluated seismic hazards. Requested Information Item (6) in Enclosure 1 to the 50.54(f) letter requests addressees to provide an interim evaluation and actions taken or planned to address a higher seismic hazard relative to the design basis, as appropriate, prior to completion and submission of the seismic risk evaluation.

Additionally, by letter dated April 12, 2013<sup>1</sup>, the Electric Power Research Institute (EPRI) staff submitted EPRI TR 3002000704 "Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima Near-Term Task Force (NTTF) Recommendation 2.1: Seismic" (hereafter referred to as the guidance). The Augmented Approach proposed that licensees would use an Expedited Seismic Evaluation Process (ESEP) to address the interim actions as requested by Information Item (6) in the 50.54(f) letter. The ESEP is a simplified seismic capacity evaluation with a focused scope of certain key installed Mitigating Strategies equipment that is used for core cooling and containment functions to cope with scenarios that involve a loss of all AC power and loss of access to the ultimate heat sink to withstand the Review Level Ground Motion, which is up to two times the safe shutdown earthquake (SSE). Due to the expedited and interim nature of the ESEP, the assessment does not include many considerations that are part of a normal risk evaluation. These deferred items, include but are not limited to, structures, piping, non-seismic failures, and operator actions, as well scenarios such as addressing loss of coolant accidents. By letter dated May 7, 2013<sup>2</sup>, the NRC staff endorsed the guidance. Central and eastern United States licensees with a reevaluated seismic hazard exceeding the SSE submitted an ESEP interim evaluation in December 2014.

Consistent with the interim nature of this activity, the staff performed the review of the licensee's submittal to assess whether the intent of the guidance was implemented. A multi-disciplined team checked whether the identified methods were consistent with the guidance. A senior expert panel reviewed the team's questions, if any, and checklist for consistency and scope. New or updated parameters (e.g., In-Structure Response Spectra, High Confidence of Low Probability of Failure calculations) presented by the licensees were assessed only based on licensee statements for acceptability for the Item (6) response. The application of this staff review is limited to the ESEP interim evaluation as part of NTTF R2.1: Seismic activities.

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<sup>1</sup> ADAMS Accession No. ML13102A142

<sup>2</sup> ADAMS Accession No. ML13106A331

## NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

### Technical Review Checklist for Palisades Nuclear Plant, Unit 1

By letter dated December 18, 2014,<sup>3</sup> Entergy Nuclear Operations Inc., (the licensee) provided an Expedited Seismic Evaluation Process (ESEP) report in a response to Enclosure 1, Requested Information Item (6) of the 50.54(f) letter, for the Palisades Nuclear Plant, Unit 1 (Palisades).

#### I. Review Level Ground Motion

The licensee:	
<ul style="list-style-type: none"> <li>described the determination of the review level ground motion (RLGM) using one of the means acceptable by the guidance<sup>1</sup></li> </ul>	Yes
<ul style="list-style-type: none"> <li>identified location of the control point and is consistent with March 2014 Seismic Hazard and Screening report (SHSR) submittal</li> </ul>	Yes
<ul style="list-style-type: none"> <li>compared the site ground motion response spectra used to select the ESEP RLGM to the SSE.</li> </ul>	Yes
Palisades used a scaled SSE at a ratio of 2.0	
<b>Notes from the Reviewer:</b> <ul style="list-style-type: none"> <li>The licensee used the maximum ratio of two times the SSE because the GMRS from the March 2014 SHSR<sup>4</sup> was greater than two times the SSE.</li> </ul>	
<b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.	
The NRC staff concludes:	
<ul style="list-style-type: none"> <li>the licensee's RLGM meets the intent of the guidance</li> </ul>	Yes
<ul style="list-style-type: none"> <li>the RLGM is reasonable for use in the interim evaluation</li> </ul>	Yes

#### II. Selection of the Success Path

The licensee:	
<ul style="list-style-type: none"> <li>described the success path</li> </ul>	Yes
<ul style="list-style-type: none"> <li>described normal and desired state of the equipment for the success path</li> </ul>	Yes
<ul style="list-style-type: none"> <li>ensured that the success path is consistent with the plant's overall mitigating strategies approach or provided a justification for an alternate path</li> </ul>	Yes
<ul style="list-style-type: none"> <li>stated that the selection process was in accordance with the guidance or meets the intent of the guidance</li> </ul>	Yes
<ul style="list-style-type: none"> <li>used installed FLEX Phase 1 equipment as part of the success path</li> </ul>	Yes
<ul style="list-style-type: none"> <li>included FLEX Phase 2 and/or 3 <u>connections</u></li> </ul>	Yes
<ul style="list-style-type: none"> <li>considered installed FLEX Phase 2 and/or 3 <u>equipment</u></li> </ul>	Yes
<b>Notes from the Reviewer:</b> None	
<b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.	

<sup>3</sup> ADAMS Accession No. ML14357A165

<sup>4</sup> ADAMS Accession No. ML14090A069

## NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

### Technical Review Checklist for Palisades Nuclear Plant, Unit 1

<p>The NRC staff concludes that:</p> <ul style="list-style-type: none"> <li>the selected success path is reasonable for use in the interim evaluation</li> <li>the licensee considered installed Phase 2 and 3 connections or equipment in the interim evaluation.</li> </ul>	<p>Yes</p> <p>Yes</p>
<p>III. Selection of the Equipment List</p>	
<p>The licensee:</p> <ul style="list-style-type: none"> <li>developed and provided the ESEL by applying the ESEP</li> <li>identified equipment considering the following functions: <ul style="list-style-type: none"> <li>Core cooling (with focus on Mode 1) function</li> <li>Available, sustainable water source</li> <li>Containment function and integrity</li> </ul> </li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
<p><b>Notes from the Reviewer:</b>None</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.</p>	
<p style="text-align: center;"><u>For PWR Plants ONLY</u></p> <p>The licensee included indicators / instrumentation for the following functions: level, pressure, temperature, that would be indicative of (but not explicitly identified to specific instruments): water level of the steam generator (SG), pressure of SG, containment, and reactor coolant system (RCS); and temperature of the RCS.</p>	<p>Yes</p>
<p style="text-align: center;"><u>For BWR Plants ONLY</u></p> <p>The licensee considered indicators for the following functions: level, pressure, temperature that would be indicative of (but not explicitly identified to specific instruments): Temperature of suppression pool, RCS, containment); Pressure of suppression pool, RCS, and drywell; water level of the suppression pool.</p>	<p>N/A</p>
<p><b>Notes from the Reviewer:</b>None</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.</p>	
<p>Through a sampling of the ESEP key components, the NRC staff concludes that:</p> <ul style="list-style-type: none"> <li>the licensee's process to develop the ESEL meets the intent of the guidance for the interim evaluation</li> <li>the desired equipment state for the success path were identified</li> <li>the licensee considered the support equipment for the ESEL</li> <li>both front-line and support systems appeared to be included in the ESEL as evidenced by inclusion of SSCs on the success path and of support systems (e.g., batteries, motor control center, inverters).</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>

## NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

### Technical Review Checklist for Palisades Nuclear Plant, Unit 1

#### IV. Walkdown Approach

<p>The licensee:</p> <ul style="list-style-type: none"> <li>described the walkdown screening approach, including walkbys and walkdowns performed exclusively for the ESEP, in accordance with the guidance</li> <li>credited previous walkdown results, including a description of current action(s) to verify the present equipment condition and/or configuration (e.g., walk-bys), in accordance with the guidance</li> <li>stated that the walkdown was performed by seismically trained personnel</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p>
<p><b>Notes from the Reviewer:</b>None</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.</p>	
<p>The licensee:</p> <ul style="list-style-type: none"> <li>described, if needed, adverse material condition of the equipment (e.g., material degradation)</li> <li>credited previous walkdown results, included a description of current action(s) to verify the present equipment condition (e.g., walk-bys), meeting the intent of the guidance</li> </ul>	<p>Yes</p> <p>Yes</p>
<p>The licensee:</p> <ul style="list-style-type: none"> <li>described the conditions of structural items considered for the interim evaluation, including: <ul style="list-style-type: none"> <li>spatial interactions (i.e., interaction between block walls and other items/components)</li> <li>anchorage</li> <li>piping connected to tanks (i.e., differential movement between pipes and tanks at connections)</li> </ul> </li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p>
<p><b>Notes from the Reviewer:</b>None</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.</p>	
<p>The licensee reported no deviations for Palisades.</p> <p>Any deviations identified was addressed, and there is a discussion of how the deficiencies will be addressed in the ESEP submittal report.</p>	<p>N/A</p>
<p>The NRC staff concludes that:</p> <ul style="list-style-type: none"> <li>the licensee described the performed walkdown approach, including any credited previous efforts (e.g., Individual Plant Examination of External Events (IPEEE) consistent with the guidance</li> <li>the licensee addressed identified deviations consistent with the guidance, if any</li> </ul>	<p>Yes</p> <p>N/A</p>



## NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

### Technical Review Checklist for Palisades Nuclear Plant, Unit 1

#### V. Capacity Screening Approach and HCLPF Calculation Results

<p>The licensee:</p> <ul style="list-style-type: none"> <li>described the capacity screening process for the ESEL items, consistent with the guidance(e.g., use of EPRI NP-6041 screening table)</li> <li>presented the results of the screened-out ESEL items in the ESEP report</li> <li>described the development of in-structure response spectra (ISRS) based on scaling</li> <li>described the development of ISRS based on new analysis consistent with the guidance</li> <li>described the method for estimating HCLPF capacity of screened-in ESEL items, including both structural and functional failure modes consistent with the guidance: <ul style="list-style-type: none"> <li>use of Conservative Deterministic Failure Margin (CDFM)</li> <li>use of fragility analysis (FA)</li> <li>use of experience data or generic information</li> </ul> </li> <li>credited IPEEE spectral shape for HCLPF capacity estimates is similar to or envelopes the RLGM, and anchored at the same control point</li> <li>presented the results of HCLPF capacities including associated failure modes for screened-in ESEL items</li> <li>reviewed the ESEL items with the lowest HCLPF values to ensure that their capacities are equal or greater than the RLGM</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>N/A</p> <p>Yes</p> <p>Yes</p> <p>N/A</p> <p>Yes</p> <p>Yes</p>
<p><b>Notes from the Reviewer:</b></p> <ol style="list-style-type: none"> <li>The staff requested clarification regarding any ESEL items located more than 40 ft. above grade level, and to describe how the HCLPF capacity was determined. In its response dated July 2, 2015 (ML15183A317), the licensee identified 4 items in the ESEL that are located more than 40 ft. above grade level, which are inaccessible during plant operation. The licensee indicated that these 4 items will be walked down during the refueling outage scheduled for Fall 2015, and a screening or calculation of the HCLPF capacity of these items will be performed. The staff finds this acceptable for this interim evaluation.</li> <li>The staff requested clarification regarding the scaling process and technical rationale followed to obtain the vertical RLGM ISRS. In its response dated July 2, 2015 (ML15183A317), the licensee explained that the scaled ground spectrum is considered for all elevations within the plant, consistent with the plant's seismic design basis. The vertical ground spectrum values are equal to two thirds of the horizontal ground spectrum. The staff finds this approach acceptable for the purposes of this interim evaluation.</li> <li>The staff requested clarification regarding the implementation of the "rule-of-the-box" in developing the HCLPF capacities for critical indicators and recorders. In its response dated July 2, 2015 (ML15183A317), the licensee explained how this rule was applied to consider components mounted within or attached to racks, panels, or other "host" components. These components were identified by the licensee during their walkdowns and verified by the Seismic Review Team (SRT) to confirm that ESEL components are bounded by equipment classes defined in EPRI NP-6041-SL. The staff finds the licensee's response acceptable for this interim evaluation.</li> <li>The staff requested clarification regarding the ESEP Report statement in Section 6.5,</li> </ol>	

## NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

### Technical Review Checklist for Palisades Nuclear Plant, Unit 1

<p>“no seal in/lockout type relays were identified... Therefore, no relay evaluations were performed.” In its response dated July 2, 2015 (ML15183A317), the licensee provided the justification for not performing relay evaluations. The staff finds the licensee’s response acceptable for the purposes of this interim evaluation.</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.</p>		
The NRC staff concludes that:		
• the licensee described the implementation of the capacity screening process consistent with the intent of the guidance		Yes
• the licensee presented capacity screening and calculation results, as appropriate, in the ESEP report		Yes
• the method used to develop the ISRS is consistent with guidance for use in the ESEP		Yes
• for HCLPF calculations, the licensee used HCLPF calculation methods as endorsed in the guidance		Yes
• no anomalies were noted in the reported HCLPF		Yes

#### VI. Inaccessible Items

The licensee:		
• provided a list of inaccessible items		Yes
• provided a schedule of the planned walkdown and evaluation for all inaccessible items		Yes
• provided Regulatory Commitment to complete walkdowns.		Yes
<b>Palisades</b> will walkdown the inaccessible items: during the refueling outage scheduled for Fall 2015		
<p><b>Notes from the Reviewer</b></p> <p>1. The licensee identified four Safety Injection Tanks that were inaccessible at the time that the ESEP report was submitted. In its response dated July 2, 2015 (ML15183A317), the licensee indicated that these items will be walked down during the refueling outage scheduled for Fall 2015, and a screening or calculation of their HCLPF capacity will be performed after the completion of the walkdowns. As committed to in the ESEP report, the licensee will provide NRC results within 60 days following the completion of ESEP activities.</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.</p>		
The NRC staff concludes that the licensee:		
• listed inaccessible items		Yes
• committed to provide the results (e.g., walkdowns, walkbys, etc.) of the remaining inaccessible items consistent with the guidance		Yes
• substitutions, if needed, were appropriately justified		Yes

## NTTF Recommendation 2.1 Expedited Seismic Evaluation Process

### Technical Review Checklist for Palisades Nuclear Plant, Unit 1

#### VII. Modifications to Plant Equipment

<p>The licensee:</p> <ul style="list-style-type: none"> <li>identified modifications for ESEL items necessary to achieve HCLPF values that bound the RLGM (excluding mitigative strategies equipment (FLEX)), as specified in the guidance</li> <li>provided a schedule to implement such modifications (if any), consistent with the intent of the guidance</li> <li>provided Regulatory Commitment to complete modifications</li> <li>provided Regulatory Commitment to report completion of modifications.</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
<p>Palisades will:</p> <ul style="list-style-type: none"> <li>Complete plant modifications not requiring a planned refueling outage by December 2016 and complete modifications requiring a refueling outage within two planned refueling outages after December 31, 2014.</li> <li>Provide a lettersummarizing results and stating completion of modifications within 60 days following the completion of ESEP activities, including commitments 1, 2, 3, and 4 as detailed in the List of Commitments in the ESEP report.</li> </ul>	
<p><b>Notes from the Reviewer:</b>None</p> <p><b>Deviation(s) or Deficiency(ies), and Resolution:</b> No deviations or deficiencies were identified.</p>	
<p>The NRC staff concludes that the licensee:</p> <ul style="list-style-type: none"> <li>identified plant modifications necessary to achieve the target seismic capacity</li> <li>provided a schedule to implement the modifications (if any) consistent with the guidance</li> </ul>	<p>Yes</p> <p>Yes</p>

#### VIII. Conclusions:

The NRC staff assessed the licensee's implementation of the ESEP guidance. Due to the interim applicability of the ESEP evaluations, use of the information for another application would require a separate NRC review and approval. Based on its review, the NRC staff concludes that the licensee's implementation of the interim evaluation meets the intent of the guidance. The staff concludes that, through the implementation of the ESEP guidance, the licensee identified and evaluated the seismic capacity of certain key installed Mitigating Strategies equipment that is used for core cooling and containment functions to cope with scenarios that involve a loss of all AC power and loss of access to the ultimate heat sink to withstand a seismic event up to the RLGM and thus, provides additional assurance while the plant seismic risk evaluation is being conducted. In the case of Palisades, the RLGM was set at the maximum ratio of two times the SSE in accordance with the guidance because the GMRS is above two times the SSE. The staff did not identify deviations or exceptions taken from the guidance. The application of this staff review is limited to the ESEP interim evaluation as part of NTTF R2.1: Seismic activities. The licensee identified safety enhancing modifications based on the evaluation. The licensee committed that modifications not requiring a planned refueling outage will be completed by December 2016 and modifications requiring a refueling outage will be completed within two planned refueling outages after December 31, 2014, and to provide a letter summarizing the results within 60 days following completion of ESEP activities.

## **NTTF Recommendation 2.1 Expedited Seismic Evaluation Process**

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### **Technical Review Checklist for Palisades Nuclear Plant, Unit 1**

In summary, the licensee, by implementing the ESEP interim evaluation, has demonstrated additional assurance which supports continued plant safety while the longer-term seismic evaluation is completed to support regulatory decision making. The NRC staff concludes that the licensee responded appropriately to Enclosure 1, Item (6) of the 50.54(f) letter, dated March 12, 2012, for Palisades.

Principal Contributors: Malcolm Patterson, Dan Hoang, Tuan Le, David Heeszal, Kevin Roche, On Yee, Richard Rivera-Lugo, Richard Morante (NRC Consultant)