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PNP 2015-069

September 09, 2015

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

SUBJECT: Response to Request for Additional Information – Palisades Nuclear Plant
Relief Request No. RR 5-2

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

- REFERENCES:
1. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2015-024, *Relief Requests, Proposed Alternatives, for the Fifth 10-Year Inservice Test Interval*, dated May 19, 2015 (ADAMS Accession Number ML15142A643)
 2. NRC e-mail to Entergy Nuclear Operations, Inc., *Palisades - Request for Additional Information Regarding the Relief Request No. RR 5-2 (MF6248)*, dated August 19, 2015 (ADAMS Accession Number ML15231A586)

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. (ENO) submitted Reference 1 to the Nuclear Regulatory Commission (NRC) requesting approval of relief requests RR 5-2 and RR 5-3 for the fifth 10-year inservice test interval. ENO received an electronic request for additional information (RAI) from the NRC for RR 5-2 in Reference 2. ENO and the NRC held a conference call on August 19, 2015 to clarify the RAI.

Attached is the ENO response to the RAI associated with RR 5-2.

This letter contains no new or revised commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "JAH", with a stylized flourish at the end.

JAH/jpm

Attachment: Response to Request for Additional Information - Palisades Nuclear Plant
Relief Request No. RR 5-2

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

ATTACHMENT

Response to Request for Additional Information – Palisades Nuclear Plant Relief Request No. RR 5-2

A request from the Nuclear Regulatory Commission (NRC) for additional information (RAI) regarding the relief request number RR 5-2 for the fifth 10-year inservice test interval, Palisades Nuclear Plant Docket No. 50-255, was received by Entergy Nuclear Operations, Inc. via electronic mail on August 19, 2015.

Nuclear Regulatory Commission (NRC) Request

By letter dated May 19, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15142A643), Entergy Nuclear Operations, Inc. (ENO, the licensee) requested approval of alternative testing associated with the inservice testing (IST) program fifth 10-year interval for Palisades Nuclear Plant. The U.S. Nuclear Regulatory Commission staff has reviewed the information provided and determined that additional information is required in order to complete its review.

Request RR 5-2 (RAI -1)

10 CFR 50.55a(f), "Inservice Testing Requirements," requires, in part, that IST of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components must meet the requirements of the ASME Operation and Maintenance (OM) Code and applicable addenda, except where alternatives have been authorized pursuant to paragraphs 10 CFR 50.55a(z)(1) or 10 CFR 50.55a(z)(2).

In proposing alternatives, a licensee must demonstrate that the proposed alternatives provide an acceptable level of quality and safety (10 CFR 50.55a(z)(1)) or compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety (10 CFR 50.55a(z)(2)).

RR 5-2 requests to apply ASME OM Code Case OMN-20 "Inservice Test Frequency" for the duration of the fifth 10-year IST interval in lieu of the test frequency requirements of ASME OM Code. A Code Case is the official method of handling a reply to an inquiry when study indicates that the Code wording needs clarification, or when the reply modifies the existing requirements of the Code, or grants permission to use alternative methods. ASME publishes Code Cases issued by the Operation and Maintenance Committee concerning the OM Code as part of the update service to the OM Code. Code Cases remain in effect for the applicable code editions and addendums, until they are annulled.

10 CFR 50.55a(b)(6), "Conditions on Operation and Maintenance of Nuclear Power Plants Code Cases," states, in part, "Licensees may apply the ASME Operation and Maintenance Code Cases listed in Regulatory Guide 1.192,

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Response to Request for Additional Information – Palisades Nuclear Plant Relief Request No. RR 5-2

Revision 1, without prior NRC approval.” Relief Request No. RR 5-2 lists all the applicable ASME OM Code requirements that have test frequency specifications.

Please specify if the licensee intends to apply OMN-20 to ASME OM Code Cases that have been found to be acceptable by NRC staff as described in RG 1.192, Revision 1.

ENO Response

Yes, ENO intends to apply OMN-20, *Inservice Test Frequency*, to applicable code cases listed in Regulatory Guide 1.192 Revision 1, *Acceptable Code Cases* and *Conditionally Acceptable Code Cases*, when utilized by Palisades Nuclear Plant during the fifth 10-year inservice test interval.