



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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Anthony J. Vitale
Site Vice President

PNP 2016-022

April 18, 2016

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: Commitment Changes Concerning Palisades Nuclear Plant Modifications
for Expedited Seismic Evaluation Process Report

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

- REFERENCES:
1. NRC letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (Adams Accession No. ML12056A046).
 2. NEI letter, *Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations*, dated April 9, 2013 (ADAMS Accession No. ML13101A379).
 3. EPRI Report 1025287, *Seismic Evaluation Guidance: Screening, Prioritization and Implementation Details (SPID) for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic*, dated February 2013 (ADAMS Accession Number ML12333A170).
 4. NRC letter, *Endorsement of EPRI Final Draft Report 1025287, "Seismic Evaluation Guidance,"* dated February 15, 2013 (ADAMS Accession Number ML12319A074).
 5. NRC letter, *Electric Power Research Institute Report XXXXXX, "Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic," as an Acceptable Alternative to the March 12, 2012, Information Request for Seismic Reevaluations*, dated May 7, 2013 (ADAMS Accession No. ML13106A331).

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6. Electric Power Research Institute Report 3002000704, *Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic*, dated May 2013.
7. Entergy Nuclear Operations, Inc. letter, PNP 2013-069, *Palisades Nuclear Plant Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident — 1.5 Year Response for CEUS Sites*, dated September 11, 2013 (ADAMS Accession Number ML1 3255A052).
8. Entergy Nuclear Operations, Inc. letter, PNP 2014-033, *Palisades Nuclear Plant Seismic Hazard and Screening Report (CEUS Sites), Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 31, 2014 (ADAMS Accession No. ML14090A069).
9. Entergy Nuclear Operations, Inc. letter, PNP 2014-108, *Palisades Nuclear Plant Expedited Seismic Evaluation Process Report (CEUS Sites), Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated December 18, 2014 (ADAMS Accession No. ML14357A165).
10. NRC letter, *Final Determination of Licensee Seismic Probabilistic Risk Assessments Under the Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 2.1 "Seismic" of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated October 27, 2015 (Accession No. ML15194A015).

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued a 50.54(f) letter to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 1 of Reference 1 requested each addressee located in the Central and Eastern United States (CEUS) to submit a Seismic Hazard Evaluation and Screening Report within 1.5 years from the date of Reference 1.

In Reference 2, the Nuclear Energy Institute (NEI) requested NRC agreement to delay submittal of the final CEUS Seismic Hazard Evaluation and Screening Reports so that an update to the Electric Power Research Institute (EPRI) ground motion attenuation model could be completed and used to develop that information. NEI proposed that descriptions of subsurface materials and properties and base case velocity profiles be submitted to the NRC by September 12, 2013, with the remaining seismic hazard and screening information submitted by March 31, 2014. NRC agreed with that proposed path forward in Reference 4.

Entergy Nuclear Operations, Inc. (ENO) submitted the descriptions of subsurface materials and properties, and base case velocity profiles for Palisades Nuclear Plant (PNP) in Reference 7.

Reference 3 contains industry guidance and detailed information to be included in the seismic hazard evaluation submittal. NRC endorsed this industry guidance in Reference 4.

The Seismic Hazard and Screening Report for Palisades Nuclear Plant, submitted in Reference 8, provided the information described in Section 4 of Reference 3 in accordance with the schedule identified in Reference 2.

Reference 1 requested that licensees provide interim evaluations and actions taken or planned to address the higher seismic hazard relative to the design basis, as appropriate, prior to completion of the risk evaluation. In accordance with the NRC endorsed guidance in Reference 3, ENO submitted the Expedited Seismic Evaluation Process (ESEP) Report for Palisades Nuclear Plant in Reference 9, which provided the information described in Section 7 of Reference 6 in accordance with the schedule identified in Reference 2.

The ESEP report submittal included the following commitment for a one-time action:

- Modify Primary Makeup Storage Tank (T-81) such that the HCLPF [High Confidence of a Low Probability of Failure] capacity is greater than the demand characterized by the RLGM [Review Level Ground Motion] Peak Ground Acceleration.

The scheduled completion date for the commitment was no later than the end of the second planned refueling outage after December 31, 2014.

ENO has cancelled this commitment, in accordance with NEI 99-04, *Guidelines for Managing NRC Commitment Changes*.

As the reevaluation of seismic risk process continues, the tank modification is no longer considered to be prudent based on the limited input assumptions for the ESEP and the new information being obtained in planning and executing a Seismic Probabilistic Risk Assessment (SPRA).

As an alternative, ENO will use the insights gained through the performance of the SPRA to determine what modifications, procedure changes, or strategy changes would provide the optimal safety improvement. The use of the SPRA will consider both new seismic hazard information and information obtained regarding significant risk contributors. As identified in Reference 10, the submittal date for the PNP SRPA is September 30, 2019.

This letter contains one new commitment, as identified in the attachment, and one commitment cancellation, as described above.

The remaining commitments made in Reference 9 are unchanged.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 18, 2016.

Sincerely,



AJV/jse

Attachment: Regulatory Commitment

cc: Director of Office of Nuclear Regulation
Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

Attachment to
PNP 2016-022
Regulatory Commitment

One page follows

Regulatory Commitment

The following table identifies an action committed to by Entergy Nuclear Operations, Inc. (ENO) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
ENO will use the insights gained through the performance of the Seismic Probabilistic Risk Assessment for Palisades Nuclear Plant to determine what modifications, procedure changes, or strategy changes would provide the optimal safety improvement.	X		September 30, 2019