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PNP 2017-075

December 19, 2017

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

SUBJECT: Response to Request for Additional Information – Proposed Changes to
Administrative Controls Section of the Technical Specifications for Permanently
Defueled Condition

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

- REFERENCES:
1. Entergy Nuclear Operations, Inc. letter number PNP 2017-035 to NRC,
*License Amendment Request – Administrative Controls for a Permanently
Defueled Condition*, dated July 27, 2017 (ADAMS Accession No.
ML17208A428)
 2. NRC email to Entergy Nuclear Operations, Inc., *Palisades Nuclear Plant
– RAI Regarding Proposed Changes to Administrative Controls Section of
the Technical Specifications for Permanently Defueled Condition (CAC
MG0021; EPID L-2017-LLA-0266)*, dated November 30, 2017 (ADAMS
Accession No. ML17335A104)

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request (LAR) to the Nuclear Regulatory Commission (NRC) for approval of changes to the Palisades Nuclear Plant (PNP) Technical Specifications (TS) Sections 1.0, *Use and Application*, and 5.0, *Administrative Controls*, to reflect a permanently defueled condition.

In Reference 2, the NRC requested additional information concerning the LAR.

Attachment 1 to this letter provides the ENO response to the NRC request for additional information.

Attachment 2 contains proposed Renewed Facility Operating License (RFOL) pages 5.0-2 and 5.0-4 changes (markup), which replace the proposed RFOL pages 5.0-2 and 5.0-4 that were provided in Attachment 2 of Reference 1.

Attachment 3 contains proposed revised RFOL pages 5.0-2 and 5.0-4, which replace the proposed revised RFOL pages 5.0-2 and 5.0-4 that were provided in Attachment 3 of Reference 1.

Summary of Commitments

This letter identifies no new regulatory commitments and no revision to existing regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 19, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read 'CFA/jse', with a long horizontal flourish extending to the right.

CFA/jse

- Attachments:
1. Response to Request for Additional Information – Proposed Changes to Administrative Controls Section of the Technical Specifications for Permanently Defueled Condition
 2. Proposed Palisades Nuclear Plant Renewed Facility Operating License Page Changes – Pages 5.0-2 and 5.0-4 (markup)
 3. Revised Palisades Nuclear Plant Renewed Facility Operating License Pages – Pages 5.0-2 and 5.0-4

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 –
Proposed Changes to Administrative Controls Section of the
Technical Specifications for
Permanently Defueled Condition**

2 pages follow

ATTACHMENT 1

A Nuclear Regulatory Commission (NRC) request for additional information (RAI) regarding a license amendment request to revise portions of the Palisades Nuclear Plant Technical Specifications (TS) for changes to the Administrative Controls Section of the TS for a permanently defueled condition (Reference 1) was received by Entergy Nuclear Operations, Inc. (ENO) via electronic mail (email) dated November 30, 2017 (Reference 2). ENO responses to the information request are provided below.

NRC REQUEST

By letter dated July 27, 2017 (ADAMS Accession No. ML17208A428), Entergy Nuclear Operations, Inc. (ENO, the licensee) submitted a license amendment request for changes to the Palisades Nuclear Plant (Palisades) Technical Specifications (TS) Sections 1.0, "Use and Application"; and 5.0, "Administrative Controls," to reflect the permanently defueled condition.

The NRC staff has reviewed the application and determined that additional information is needed for the staff to complete its review.

NRC RAI-1

The current Subsection 5.2.1d states: "The individuals who train the operating staff and those who carry out radiation safety and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures."

The proposed Subsection 5.2.1d states: "The individuals who train the CERTIFIED FUEL HANDLERS, carry out radiation protection, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their ability to perform their assigned functions."

- a. Clarify who the individuals are that the proposed TS 5.2.1d refers (i.e. is the requirement intended to apply to any individual who has responsibility for any of the three listed duties, or is it intended to apply to a more limited group of individuals?)*
- b. If needed, propose new wording for TS 5.2.1d.*

ENO Response to RAI-1

- a. The requirement in the proposed TS 5.2.1d is intended to apply to any individual who has responsibility for any of the three listed duties.
- b. For clarity, new wording for TS 5.2.1d is proposed below:

"The individuals who train the CERTIFIED FUEL HANDLERS and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions."

ATTACHMENT 1

The wording for TS 5.2.1d has been changed in the markup of the proposed Renewed Facility Operating License (RFOL) page 5.0-2 in Attachment 2 of this submittal, and in the proposed revised RFOL page 5.0-2 in Attachment 3 of this submittal.

The changed page 5.0-2 in Attachments 2 and 3 of this submittal replaces the page 5.0-2 that was provided in Attachments 2 and 3 of Reference 1.

Since this revised proposed change is to clarify the wording proposed in Reference 1 for TS 5.2.1d and is administrative in nature, the basis provided in Reference 1 for the proposed TS 5.2.1d change continues to be applicable.

NRC RAI-2

The current TS 5.3.1. states: "Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Entergy Quality Assurance Program Manual (QAPM)."

The proposed TS 5.3.1. states: "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM)."

Clarify why the title of TS Section 5.3, which refers to "Plant Staff Qualifications," continues to use the term "plant," and does not reflect the change from an operating plant to a permanently defueled facility.

ENO Response to RAI-2

For consistency with TS 5.3.1, the title of TS Section 5.3 should be "Facility Staff Qualifications" rather than "Plant Staff Qualifications." This title has been changed in the markup of the proposed RFOL page 5.0-4 in Attachment 2 of this submittal, and in the proposed revised RFOL page 5.0-4 in Attachment 3 of this submittal.

The changed page 5.0-4 in Attachments 2 and 3 of this submittal replaces the page 5.0-4 that was provided in Attachments 2 and 3 of Reference 1.

This revision to the title of TS Section 5.3 is an administrative change, and the bases provided in Reference 1 for the proposed changes to TS Section 5.3 continue to be applicable.

References

1. ENO letter number PNP 2017-035 to NRC, *License Amendment Request – Administrative Controls for a Permanently Defueled Condition*, dated July 27, 2017 (ADAMS Accession No. ML17208A428)
2. NRC email to ENO, *Palisades Nuclear Plant – RAI Regarding Proposed Changes to Administrative Controls Section of the Technical Specifications for Permanently Defueled Condition (CAC MG0021; EPID L-2017-LLA-0266)*, dated November 30, 2017 (ADAMS Accession No. ML17335A104)

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ATTACHMENT 2

Proposed Palisades Nuclear Plant

Renewed Facility Operating License Page Changes –

Pages 5.0-2 and 5.0-4 (markup)

(showing proposed changes; additions are highlighted and deletions are strikethrough)

2 pages follow

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for ~~plant~~ **facility staff** ~~operation~~ and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety **storage and handling** of the ~~Palisades plant~~ **spent nuclear fuel**.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all ~~operating~~ **facility** organization positions. These relationships shall be documented, and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key positions, or in equivalent forms of documentation. These requirements and the plant specific equivalent of those titles referred to in these Technical Specifications shall be documented in the FSAR.
- b. The ~~plant superintendent~~ **manager** shall be responsible for overall ~~plant~~ **facility** safe operation and shall have control over those onsite activities necessary for safe ~~operation~~ **storage** and maintenance of the ~~plant~~ **spent nuclear fuel**.
- c. A specified corporate ~~executive~~ **officer** shall have corporate responsibility for ~~the overall plant nuclear safety~~ **storage and handling of spent nuclear fuel** and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the ~~plant~~ **facility** to ensure **safe management of spent nuclear safety fuel**.
- d. The individuals who train the ~~operating staff~~ **CERTIFIED FUEL HANDLERS** and those who carry out radiation ~~safety~~ **protection** and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ~~independence from operating pressures~~ **ability to perform their assigned functions**.

5.2.2 Plant **Facility** Staff

The facility staff organization shall include the following:

- a. ~~A non-licensed operator~~ **Each duty shift shall be composed of at least one shift manager and one NON-CERTIFIED OPERATOR. The NON-CERTIFIED OPERATOR position may be filled by a CERTIFIED**

5.0 ADMINISTRATIVE CONTROLS

5.3 ~~Plant~~Facility Staff Qualifications

- 5.3.1 Each member of the ~~plant~~facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the ~~Energy~~ Quality Assurance Program Manual (QAPM).
- 5.3.2 ~~(Deleted)~~ A NRC approved training and retraining program for CERTIFIED FUEL HANDLERs shall be maintained.
- 5.3.3 (Deleted)
- 5.3.4 (Deleted)
- 5.3.5 ~~For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).~~ (Deleted)
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ATTACHMENT 3

Revised Palisades Nuclear Plant

Renewed Facility Operating License Pages –

Pages 5.0-2 and 5.0-4

2 pages follow

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for facility staff and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safe storage and handling of spent nuclear fuel.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all facility organization positions. These relationships shall be documented, and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key positions, or in equivalent forms of documentation. These requirements and the plant specific equivalent of those titles referred to in these Technical Specifications shall be documented in the FSAR.
- b. The plant manager shall be responsible for overall facility safe operation and shall have control over those onsite activities necessary for safe storage and maintenance of spent nuclear fuel.
- c. A specified corporate officer shall have corporate responsibility for the safe storage and handling of spent nuclear fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the facility to ensure safe management of spent nuclear fuel.
- d. The individuals who train the CERTIFIED FUEL HANDLERS and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

5.2.2 Facility Staff

The facility staff organization shall include the following:

- a. Each duty shift shall be composed of at least one shift manager and one NON-CERTIFIED OPERATOR. The NON-CERTIFIED OPERATOR position may be filled by a CERTIFIED FUEL HANDLER.
- b. Oversight of fuel handling operations shall be provided by a CERTIFIED FUEL HANDLER.

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

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|-------|---|--|
| 5.3.1 | Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM). | |
| 5.3.2 | A NRC approved training and retraining program for CERTIFIED FUEL HANDLERS shall be maintained. | |
| 5.3.3 | (Deleted) | |
| 5.3.4 | (Deleted) | |
| 5.3.5 | (Deleted) | |
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