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**Enclosure Attachment 2 contains Security-Related Information
to be withheld from Public Disclosure in accordance with 10 CFR 2.390.
Upon removal of Enclosure Attachment 2, this letter is uncontrolled.**

10 CFR 50.90

PNP 2019-028

May 28, 2019

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

Subject: Response to Request for Additional Information - License Amendment Request
to Revise Existing Facility Operating License Conditions Regarding NFPA 805
Modifications

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

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request (LAR) to the Nuclear Regulatory Commission (NRC) to revise the renewed facility operating license (RFOL) conditions regarding NFPA 805 modifications.

In Reference 2, ENO submitted a LAR to the NRC to change the full compliance implementation date for the fire protection program transition license condition for required modifications.

In Reference 3, ENO received an electronic request for additional information (RAI) from the NRC in response to Reference 1. The ENO response to the RAI is provided in Enclosure 1.

In Enclosure Attachment 1 of this letter, ENO is providing a revision (markup & clean) to the proposed RFOL pages that were submitted in Attachment 2 of Reference 1 and in Attachments 1 and 2 of Reference 2. Enclosure Attachment 1 supersedes in their entirety Attachment 2 of Reference 1 and Attachments 1 and 2 of Reference 2.

In Enclosure Attachment 2 of this letter, ENO is providing an updated Attachment S, Table S-1, "Plant Modifications Completed," and Table S-2, "Plant Modifications Committed." Enclosure Attachment 2 supersedes in their entirety Attachment 3 of Reference 1 and Attachment 3, Table

S-1, of Reference 4. Enclosure Attachment 2 contains security related information and should be withheld from public disclosure in accordance with 10 CFR 2.390.

This RAI response does not impact the conclusions of the no significant hazards consideration determination or the environmental consideration provided in Reference 1.

This letter identifies no new regulatory commitments.

In accordance with 10 CFR 50.91, ENO is notifying the State of Michigan of this RAI response by transmitting a copy of this letter and enclosure with attachments to the designated State Official.

If there are questions or if additional information is needed, please contact Jeff Hardy, Regulatory Assurance Manager, at 269-764-2011.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 28, 2019.

Respectfully,



Ron Gaston

RWG/ach

Enclosure: Response to Request for Additional Information - License Amendment Request to Revise Existing Facility Operating License Conditions Regarding NFPA 805 Modifications

Attachments to Enclosure:

1. Proposed RFOL page changes (markup & clean)
2. Updated Attachment S, Table S-1, "Plant Modifications Completed," and Table S-2, "Plant Modifications Committed" (Security-related information, withhold under 10 CFR 2.390)

References:

- 1) ENO letter to NRC, PNP 2018-040, "License Amendment Request to Revise Existing Facility Operating License Conditions Regarding NFPA 805 Modifications," (ADAMS Accession Number ML18305B320), dated November 1, 2018
- 2) ENO letter to NRC, PNP 2019-007, "License Amendment Request to Change the Full Compliance Implementation Date for the Fire Protection Program Transition License Condition for Required Modifications," (ADAMS Accession Number ML19067A004), dated March 8, 2019
- 3) NRC electronic mail, "Request for Additional Information for Palisades License Amendment Request to Revise License Conditions Related to NFPA 805 Modifications," (ADAMS Accession Number ML19122A485), dated April 29, 2019
- 4) ENO letter to NRC, PNP 2014-080, "Response to Request for Additional Information - License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors," (ADAMS Accession Number ML14226A498), dated August 14, 2014

cc: NRC Region III Regional Administrator
NRC Senior Resident Inspector – Palisades
Designated State Official – Michigan
NRC Project Manager – Palisades