



**Entergy Nuclear Operations, Inc.**  
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**Ron Gaston**  
Director, Nuclear Licensing

10 CFR 50.55a

PNP 2020-034

September 28, 2020

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

**Subject:** Response to Request for Additional Information Regarding Relief Request Number RR 5-8, *Proposed Alternative to ASME Section XI Code Requirements for Repair of Reactor Pressure Vessel Head Penetrations*

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

- References:**
1. Entergy Nuclear Operations, Inc. letter PNP 2020-031, *Relief Request Number RR 5-8, Proposed Alternative to ASME Section XI Code requirements for Repair of Reactor Pressure Vessel Head Penetrations*, (NRC ADAMS Accession Package Number ML20267A386), dated September 23, 2020
  2. NRC email to Entergy Nuclear Operations, Inc., *Request for Additional Information: Palisades Relief Request RR 5-8 (Proposed Alternative) for Reactor Pressure Vessel Head Penetration Repairs (EPID: L-2020-LLR-0128)*, Dated September 26, 2020

Pursuant to Title 10 of the Code of Federal Regulations (CFR) 50.55a(z)(1), *Acceptable level of quality and safety*, Entergy Nuclear Operations, Inc. (Entergy) submitted a request to the Nuclear Regulatory Commission for authorization of relief request number RR 5-8, *Proposed Alternative to ASME Section XI Code Requirements for Repair of Reactor Pressure Vessel Head Penetrations*, for the Palisades Nuclear Plant (Reference 1).

In Reference 2, Entergy received an electronic request for additional information (RAI) from the NRC. The Entergy response to the RAI is provided in Attachment 1.

Attachment 1 is a Framatome report that provides the responses to the RAI and contains information considered proprietary to Framatome, Inc. On behalf of Framatome, Inc., Entergy requests that the NRC withhold this information in accordance with 10 CFR 2.390, *Public inspections, exemptions, requests for withholding*. Attachment 2 contains an affidavit supporting withholding of the proprietary information. Attachment 3 contains a non-proprietary version of the RAI responses. Upon removal of the proprietary information in Attachment 1, the balance of this submittal is uncontrolled.

This letter contains no new commitments and no revised commitments.

Should you have any questions or require additional information, please contact Jim Miksa Regulatory Assurance Engineer at (269) 764-2945.

Should you have any questions associated with the affidavit, please contact Philip A. Opsal at Framatome, OF34, 3315 Old Forest Rd., Lynchburg, VA 24501.

Respectfully,



RWG/jpm

- Attachment:
1. Framatome Document No. ANP-3876 Revision 1Q1P, *Response to NRC Request for Additional Information of Palisades Relief Request Number RR 5-8, Repair of Reactor Pressure Vessel Head Penetration, Inservice Inspection Program, Fifth Ten-Year Interval (Proprietary Information – Withhold Under 10 CFR 2.390)*
  2. Framatome, Inc. Affidavit Supporting Withholding of Proprietary Information
  3. Framatome Document No. ANP-3876 Revision 1Q1NP, *Response to NRC Request for Additional Information of Palisades Relief Request Number RR 5-8, Repair of Reactor Pressure Vessel Head Penetration, Inservice Inspection Program, Fifth Ten-Year Interval (Non-Proprietary)*

cc: NRC Region III Regional Administrator  
NRC Senior Resident Inspector -Palisades  
NRC Project Manager -Palisades