



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

February 24, 2022

Mr. Darrell Corbin
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT – TRIENNIAL FIRE PROTECTION
INSPECTION REPORT 05000255/2021010

Dear Mr. Corbin:

On January 18, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Palisades Nuclear Plant and discussed the results of this inspection with Mr. D. Lucy, General Manager, Plant Operations and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard A. Skokowski".

Signed by Skokowski, Richard
on 02/24/22

Richard A. Skokowski, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No. 05000255
License No. DPR-20

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Darrell Corbin from Richard A. Skokowski dated February 24, 2022.

SUBJECT: PALISADES NUCLEAR PLANT – TRIENNIAL FIRE PROTECTION
INSPECTION REPORT 05000255/2021010

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 05000255

License Number: DPR-20

Report Number: 05000255/2021010

Enterprise Identifier: I-2021-010-0058

Licensee: Entergy Nuclear Operations, Inc.

Facility: Palisades Nuclear Plant

Location: Covert, MI

Inspection Dates: November 29, 2021 to December 10, 2021

Inspectors: J. Benjamin, Senior Reactor Inspector
A. Dahbur, Senior Reactor Inspector
J. Gilliam, Senior Reactor Inspector

Approved By: Richard A. Skokowski, Chief
Engineering Branch 3
Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a triennial fire protection inspection at Palisades Nuclear Plant, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors completed a reduced inspection at Palisades Nuclear Plant which focused on a sample of programs, systems, and components the site will rely on after their decommissioning. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

REACTOR SAFETY

71111.21N.05 - Fire Protection Team Inspection (FPTI)

Structures, Systems, and Components (SSCs) Credited for Fire Prevention, Detection, Suppression, or Post-Fire Safe Shutdown Review (IP Section 03.01) (2 Samples)

The inspectors verified that components and/or systems will function as required to support the credited functions stated for each sample. Additional inspection considerations are located in the fire hazards analysis (FHA) or safe shutdown analysis (SSA).

- (1) Spent Fuel Pool Makeup and Cooling Capabilities
- (2) Aging Management Commitment for Fire Protection Sprinklers

Fire Protection Program Administrative Controls (IP Section 03.02) (1 Sample)

The inspectors verified that the selected control or process is implemented in accordance with the licensee's current licensing basis. If applicable, ensure that the licensee's FPP contains adequate procedures to implement the selected administrative control. Verify that the selected administrative control meets the requirements of all committed industry standards.

- (1) Combustible Control Program

Fire Protection Program Changes/Modifications (IP Section 03.03) (1 Sample)

The inspectors verified the following:

- a. Changes to the approved FPP do not constitute an adverse effect on the ability to safely shutdown.
- b. The adequacy of the design modification, if applicable.
- c. Assumptions and performance capability stated in the SSA have not been degraded through changes or modifications.
- d. The FPP documents, such as the Updated Final Safety Analysis Report, fire protection report, FHA, and SSA were updated consistent with the FPP or design change.
- e. Post-fire SSD operating procedures, such as abnormal operating procedures, affected by the modification were updated.

- (1) Fire Protection Program Change to DBD 7.10 "Design Basis Document for NFPA 805 Fire Protection Program," Section 3.6.2 "Standpipe and Hose Station"

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On January 18, 2022, the inspectors presented the triennial fire protection inspection results to Mr. D. Lucy, General Manager, Plant Operations and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.05	Corrective Action Documents	CR-PLP-2004-0464	EA-FPS-2001-01 Objectives Not Met w/ Hose Reels 19 & 20 with Track Alley Sprinkler	08/04/2004
		CR-PLP-2004-0486	EA-FPS-2001-01 Objectives Not Meet with Hose Reels 19 and 20 with Track Alley Sprinklers	08/04/2004
		CR-PLP-2019-04230	Create a WR to Perform a Visual Inspection and Functional Test of Door-1001	10/22/2019
		LR-LAR-2009-00244 CA 25	Replace or Test Sprinkler Heads	09/15/2009
	Corrective Action Documents Resulting from Inspection	CR-PLP-2021-03060	Changes Did Not Have FP Impact Review	12/02/2021
		CR-PLP-2021-03126	PLP-RPT-12-00053 and DBD-7.10 Have Incorrect Nozzle Manufacturer and Model	12/10/2021
		CR-PLP-2022-00075	Revise EA-FPS-2001-01 to Reflect the Installed 75 psi Automatic Nozzles at Hose Reel 19 and 20	01/12/2022
	Engineering Evaluations	NET-28086-000-01	Criticality Safety Analysis for the Palisades Spent Fuel Pool with Region 2 Empty Cells Credit	0
		PAD 20-0047	FPSP-SO-2 Inspection and Testing of Palisades Plant Fire Doors	0
	Fire Plans	FPF	Pre Fire Plans Manual	6
	Miscellaneous	DBD 7.10	Design Basis Document for NFPA 805 Fire Protection Program," Section 3.6.2 "Standpipe and Hose Station	4
		FAQ 07-0040	Non-Power Operations Clarifications	5
	Procedures	EN-DC-127	Control of Hot Work and Ignition Sources	21
		EN-DC-127	Control of Hot Work and Ignition Sources	21
		EN-DC-161	Control of Combustibles	24
		FPIP-4	Fire Protection Systems and Fire Protection Equipment	41
		FPSP-AO-3	Fire Hose Reel/Rack Station Valve Check	8
		SOP-27	Fuel Pool System	75
	Self-Assessments	LO-PLPLO-2020-00073	Pre- NRC Triennial Fire Protection Inspection Focused Self-Assessment	06/08/2021