



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

PNP 2014-099

November 12, 2014

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

SUBJECT: License Amendment Request for Approval of Palisades Nuclear Plant
10 CFR 50 Appendix G Equivalent Margins Analysis

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

- REFERENCES:
1. Palisades Nuclear Plant, *Application for Renewed Operating License*, dated March 22, 2005 (ADAMS Accession No. ML050940446).
 2. Entergy Nuclear Operations, Inc. letter PNP 2013-028, *Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margins Analysis*, dated October 21, 2013 (ADAMS Accession No. ML13295A448).
 3. NRC email to Entergy Nuclear Operations, Inc., *Request for Additional Information - Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margin Analysis - MF 2962*, dated May 13, 2014 (ADAMS Accession No. ML14133A684).
 4. Entergy Nuclear Operations, Inc. letter PNP 2014-054, *Response to NRC Request for Additional Information - Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margin Analysis – MF 2962*, dated June 12, 2014 (ADAMS Accession No. ML14163A662).
 5. Entergy Nuclear Operations, Inc. letter PNP 2014-066, *Supplemental Response to NRC Request for Additional Information - Palisades Nuclear Plant 10 CFR 50 Appendix G Equivalent Margin Analysis – MF 2962*, dated June 26, 2014 (ADAMS Accession No. ML14177A707).

Dear Sir or Madam:

In the Palisades Nuclear Plant (PNP) license renewal application (Reference 1), Nuclear Management Company (NMC), the former license holder for PNP, committed to submit an equivalent margins analysis (EMA) for Nuclear Regulatory Commission (NRC) approval at least three years before any reactor vessel beltline material Charpy upper-shelf energy (USE) decreases to less than 50 ft-lb, in accordance with 10 CFR 50 Appendix G, Section IV, "Fracture Toughness Requirements."

Entergy Nuclear Operations, Inc. (ENO) submitted the required EMA in Reference 2 under 10 CFR 50.4, "Written communications," as required by 10 CFR 50 Appendix G. In Reference 3, ENO received a request for additional information (RAI) concerning the EMA submittal. The ENO response to RAI questions 1, 3, 4, 5, and 6 was provided in Reference 4. The ENO response to RAI question 2 was provided in Reference 5.

During a conference call with ENO on October 21, 2014, the NRC requested that the EMA be submitted under 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," rather than under 10 CFR 50.4.

Pursuant to 10 CFR 50.90, ENO hereby submits an amendment application for the PNP operating license. The proposed amendment requests approval of an EMA completed in accordance with 10 CFR 50 Appendix G, Section IV.

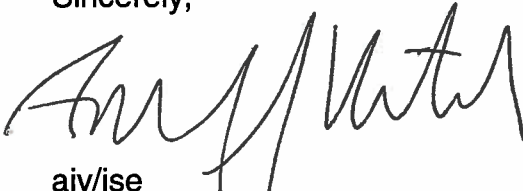
This submittal contains no proprietary information.

ENO requests approval of the enclosed EMA by May 12, 2015.

In accordance with 10 CFR 50.91(b), a copy of this application, with attachments, is being provided to the designated State of Michigan official.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 12, 2014.

Sincerely,



ajv/jse

- Attachments:
1. Description and Assessment of Requested Change
 2. Responses to Request for Additional Information Questions
 3. Westinghouse WCAP-17403-NP, Revision 1, "Palisades Nuclear Power Plant Extended Beltline Reactor Vessel Integrity Evaluation"
 4. Westinghouse, WCAP-15353 – Supplement 2 – NP, Revision 0, "Palisades Reactor Pressure Vessel Fluence Evaluation"
 5. Westinghouse WCAP-17651-NP, Revision 0, "Palisades Nuclear Power Plant Reactor Vessel Equivalent Margins Analysis"

cc: Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC
State of Michigan