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PNP 2013-065

August 28, 2013

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
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**SUBJECT:** Palisades Nuclear Plant First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

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

- REFERENCES:**
1. NRC Order Number EA-12-051, *Order To Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012 (ADAMS Accession No. ML12054A682)
  2. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12221A339)
  3. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,"* Revision 1, dated August 2012 (ADAMS Accession No. ML12240A307)
  4. Entergy Nuclear Operations, Inc. (ENO) letter to NRC, PNP 2012-092, *Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated October 25, 2012 (ADAMS Accession No. ML12300A067)
  5. Entergy Nuclear Operations, Inc. (ENO) letter to NRC, PNP 2013-009, *Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying License With Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013 (ADAMS Accession No. ML13060A360)

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Entergy Nuclear Operations, Inc. (ENO). This order was immediately effective and directed ENO to install reliable spent fuel pool level instrumentation at the Palisades Nuclear Plant (PNP).

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the PNP initial status report regarding mitigation strategies. Reference 5 provided the PNP overall integrated plan.

The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new commitments and no revised commitments.

I declare under penalty of perjury that the foregoing is true and correct; executed on August 28, 2013.

Sincerely,



ajv/jse

Attachment: Palisades Nuclear Plant First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

cc: Office Director, NRR, USNRC  
Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC

## Attachment

# Palisades Nuclear Plant First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

## 1 Introduction

Entergy Nuclear Operations, Inc. (ENO) developed for Palisades Nuclear Plant (PNP) an overall integrated plan (Reference 1), documenting the requirements to install reliable spent fuel pool level instrumentation (SFPI), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the overall integrated plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

## 2 Milestone Accomplishments

None.

## 3 Milestone Schedule Status

The following provides an update to the milestone schedule in support of the overall integrated plan, the activity status of each item, and the expected completion date noting any change. The dates (current as of July 31, 2013) are planning dates subject to change as design and implementation details are developed.

The target completion date for installation of reliable spent fuel pool instrumentation was revised from the Spring of 2015 to the Fall of 2015 to reflect a change in the 2015 refueling outage schedule. The response to a NRC Request for Additional Information (RAI) (Reference 3) has been added to the milestone schedule detailed below and is in progress, as of July 31, 2013. Addition of the response to the NRC RAI does not affect the ability of ENO to meet the Order implementation date.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Reliable SFPI Installed	Spring 2015 Refueling Outage	In Progress	Fall 2015 Refueling Outage
Response to NRC Request for Additional Information (received July 18, 2013) (Reference 3)	August 19, 2013	In Progress	

#### **4 Changes to Compliance Method**

There are no changes to the compliance method as documented in the overall integrated plan (Reference 1).

#### **5 Need for Relief/Relaxation and Basis for the Relief/Relaxation**

ENO expects to comply with the order implementation date and no relief/relaxation is required at this time.

#### **6 Open Items from Overall Integrated Plan and Draft Safety Evaluation**

None.

#### **7 Potential Draft Safety Evaluation Impacts**

The NRC has not yet issued a draft safety evaluation; therefore, there are no potential impacts to the Draft Safety Evaluation identified at this time.

#### **8 References**

The following references support the updates to the overall integrated plan described in this attachment.

1. ENO letter to NRC, PNP 2013-009, *Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying License With Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013 (ADAMS Accession No. ML13060A360)
2. NRC Order Number EA-12-051, *Order To Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012 (ADAMS Accession No. ML12054A682)
3. NRC email to ENO, *Palisades Nuclear Plant – Requests for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (TAC MF0769)*, dated July 18, 2013 (ADAMS Accession No. ML13200A328)