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PNP 2015-084

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U.S. Nuclear Regulatory Commission
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SUBJECT: Notification of Full Compliance with NRC Order EA-12-051, "Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"

Palisades Nuclear Plant
Docket No. 50-255
Renewed Facility Operating 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. Entergy Nuclear Operations, Inc. 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)
 3. Entergy Nuclear Operations, Inc. 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)
 4. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2013-061, *Palisades Nuclear Plant Response to Request for Additional Information for the Overall Integrated Plan in Response to the Commission Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation*, August 19, 2013 (ADAMS Accession No. ML13231A126)
 5. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2013-065, *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)*, dated August 28, 2013 (ADAMS Accession No. ML13241A235)
 6. NRC Interim Staff Evaluation, *Palisades-Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0769)*, dated November 26, 2013 (ADAMS Accession No. ML13312A423)

7. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2014-010, *Palisades Nuclear Plant Second 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)*, dated February 28, 2014 (ADAMS Accession No. ML14059A078)
8. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2014-084, *Palisades Nuclear Plant Third 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)*, dated August 28, 2014 (ADAMS Accession No. ML14240A278)
9. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2015-005, *Palisades Nuclear Plant Fourth 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)*, dated February 27, 2015 (ADAMS Accession No. ML15062A056)
10. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2015-062, *Palisades Nuclear Plant Fifth 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)*, dated August 28, 2015 (ADAMS Accession No. ML 15240A074)
11. NRC letter, *Palisades Nuclear Plant – Report for the Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC Nos. MF0768 AND MF0769)*, dated October 13, 2015 (ADAMS Accession No. ML15272A324).

Dear Sir or Madam:

The purpose of this letter is to notify the NRC that Entergy Nuclear Operations, Inc. (ENO) Palisades Nuclear Plant (PNP) is in full compliance with Order EA-12-051, "Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation." On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 (Reference 1) to ENO. Order EA-12-051 was immediately effective and directed ENO to install reliable spent fuel pool level instrumentation at the PNP.

Order EA-12-051, Section IV.A.2, requires completion of full implementation to be no later than two refueling cycles after submittal of the Overall Integrated Plan (OIP) or December 31, 2016, whichever comes first. In addition, Section IV.C.3 of Order EA-12-051 requires that licensees report to the NRC when full compliance is achieved. The OIP for EA-12-051 was submitted (Reference 3) on February 28, 2013. On October 19, 2015, PNP entered Mode 2 (startup), completing two refueling cycles after submittal of the OIP. PNP was in full compliance with Order EA-12-051 at that time.

In References 2, 5, 7, 8, 9, and 10, status reports were provided to the NRC with regard to implementation of Order EA-12-051 at PNP.

ENO responded to NRC requests for additional information (RAIs) associated with the OIP in Reference 4.

In Reference 6, the NRC documented an interim staff evaluation (ISE) for the PNP OIP, which included additional RAIs. ENO responses to the ISE RAIs were provided in the third and fourth six-month status reports (References 8 and 9).

In Reference 11, the NRC issued a report for an audit conducted at PNP regarding implementation of mitigating strategies and reliable spent fuel pool instrumentation related to Orders EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," and EA-12-051. The audit included a review of ENO responses to the ISE RAI questions. There were no open or pending SFPI items listed in the audit report.

The design bridging document that compared ENO implementation of the spent fuel pool instrumentation at PNP to the vendor supplied technical information and assumptions was provided in the fourth six-month status report (Reference 9).

The attachment summarizes PNP compliance with Order EA-12-051.

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 December 16, 2015.

Sincerely,



AJV/jse

Attachment: Palisades Nuclear Plant Compliance Bases for Order EA-12-051

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

Attachment

Palisades Nuclear Plant Compliance Bases for Order EA-12-051

BACKGROUND

On March 12, 2012, the NRC issued Order EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool (SFP) Instrumentation* (Reference 1), to Entergy Nuclear Operations, Inc. (ENO). Order EA-12-051 was effective immediately and directed ENO to install reliable SFP instrumentation as outlined in Attachment 2 of the Order at Palisades Nuclear Plant (PNP). The information provided herein documents full compliance for PNP with the Order.

COMPLIANCE

ENO has installed two independent full range level monitors for the PNP SFP in response to Reference 1.

The Overall Integrated Plan (OIP) for EA-12-051 was submitted (Reference 3) on February 28, 2013. ENO responded to NRC requests for additional information (RAIs) associated with the OIP in Reference 4. In Reference 6, the NRC documented an interim staff evaluation (ISE) for the PNP OIP, which included additional RAIs. ENO responses to the ISE RAIs were provided in the third and fourth six-month status reports (References 8 and 9).

In References 2, 5, 7, 8, 9, and 10, status reports were provided to the NRC with regard to implementation of Order EA-12-051 at PNP.

In Reference 11, the NRC issued a report for an audit conducted at PNP regarding implementation of mitigating strategies and reliable spent fuel pool instrumentation related to Orders EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," and EA-12-051. The audit included a review of ENO responses to the ISE RAI questions. There were no open or pending SFPI items listed in the audit report.

The design bridging document that compared ENO implementation of the spent fuel pool instrumentation at PNP to the vendor supplied technical information and assumptions was provided in the fourth six-month status report (Reference 9).

ENO plans to provide the vendor qualification report for modified SFP instrumentation in a supplemental submittal.

On October 19, 2015, PNP entered Mode 2 (startup), completing two refueling cycles after submittal of the OIP. PNP was in full compliance with Order EA-12-051 at that time.

ACTIONS COMPLETED

Engineering Change (EC) 46466, "Spent Fuel Pool Instrumentation," has been implemented providing SFP level monitoring capability in two locations: the main control room and the auxiliary building.

IDENTIFICATION OF LEVELS OF REQUIRED MONITORING – COMPLETE

PNP Level 1: Elevation 645 feet 7 inches

The level at which reliable suction loss occurs due to uncovering the coolant inlet pipe or any weirs or vacuum breakers associated with suction loss.

PNP Level 2: Elevation 634 feet 5 inches

Ten feet (+/- one foot) above highest point of any fuel rack seated in the SFP.

PNP Level 3: Elevation 625 feet 5 inches

Highest point of any fuel rack seated in SFP associated with level where fuel remains covered, plus one foot.

INSTRUMENT DESIGNED FEATURES – COMPLETE

PNP SFP level instrument channels incorporate two permanently installed, physically independent, and physically separated channels (channel separation is in accordance with existing plant design basis requirements). Sensors at the SFP are spatially separated near opposite corners of the SFP with the cables being protected by a metallic raceway and maintaining the same relative spatial separation until exiting the SFP floor. The primary display (channel A) is installed in the back of the main control room. The backup display (channel B) is installed in the auxiliary building. Power sources include 1) independent plant alternating current (AC) power sources, 2) channel-specific stand-alone battery power with analyzed and tested seven-day capacity, as well as 3) connections and cables for external direct current (DC) alternate power source capability. Equipment and raceways are mounted/installed to PNP Seismic Category I requirements.

Program Features – COMPLETE

Training has been conducted. The SFP instrumentation has been added to the PNP Operating Requirements Manual (ORM). The ORM contains functionality, applicability, and testing requirements, and actions to restore functionality if lost. Preventive maintenance (PM) activities have been established to calibrate the SFP level instrumentation and to replace the batteries in accordance with the ENO PM program. Routine monitoring is provided per operator log entries.

Milestone Schedule – ITEMS COMPLETE

PNP Milestones	Completion Date
Response to NRC Request for Additional Information (received July 18, 2013)	August 19, 2013 (Reference 4)
PNP Reliable SFPI Design Modification Package Developed/Issued (EC 46466)	August 1, 2014
Response to NRC ISE Request for Additional Information (received November 26, 2013)	February 27, 2015 (Reference 9)
PNP Reliable SFPI Installed	August 31, 2015

Based on the above, the requirements of Order EA-12-051 have been implemented for PNP. A summary of PNP compliance with Reference 1 is provided as follows:

COMPLIANCE ELEMENTS SUMMARY

In accordance with NRC Order EA-12-051, ENO shall have a reliable indication of the water level in associated spent fuel storage pools capable of supporting identification of the following pool water level conditions by trained personnel:

- (1) level at which reliable suction loss occurs due to uncovering the coolant inlet pipe or any weirs or vacuum breakers associated with suction loss,
- (2) level that is adequate to provide substantial radiation shielding for a person standing on the SFP operating deck, and
- (3) level where fuel remains covered and actions to implement make-up water addition should no longer be deferred.

Per References 3, 4, and 8, key SFP water levels, including the three critical levels defined in Nuclear Energy Institute (NEI) 12-02, Revision 1 (Reference 12), were identified. Both the primary and backup instrument level channels are permanent, mounted directly within the SFP, and measure level over a single continuous range from above Level 1 down to below the upper limit of Level 3. Access to the SFP area is not required to operate the instrument channels or to obtain level data. Displays and signal processors are located in the main control room (channel A) and in the auxiliary building (channel B). The three critical levels for PNP are as follows:

LEVEL 1: Level 1 is the level at which reliable pump suction loss occurs due to uncovering the coolant inlet pipe or any weirs or vacuum breakers since it is more limiting than level associated with pump net positive suction head requirements. For PNP, the elevation associated with this level is 645 feet 7 inches due to uncovering of the skimmer opening.

LEVEL 2: Level 2 is the level adequate to provide substantial radiation shielding for a person standing on the SFP operating deck. ENO has selected the ten-foot option, as described in Section 2.3.2 of NEI 12-02 (Reference 12), which has been determined by the NRC to meet the requirements of the order with no further evaluation or review required. Because Level 2 has been chosen as ten feet (+/- one foot) above the highest point of any fuel rack seated in the SFP, no additional analysis is required. The elevation associated with this level is 634 feet 5 inches for PNP.

LEVEL 3: Level 3 is the level where fuel remains covered plus one foot. The level where fuel remains covered is defined as the highest point of any fuel rack seated in the SFP (within +/- one foot). The highest point of any fuel rack seated in the SFP is 624 feet 5 inches for PNP. Therefore, Level 3 is elevation 625 feet 5 inches for PNP.

1. In accordance with NRC Order EA-12-051, the SFP level instrumentation shall include the following design features:

- a. **Instruments:** The instrumentation shall consist of a permanent, fixed primary instrument channel and a backup instrument channel. The backup instrument channel may be fixed or portable.

Per References 3, 4, 8 and 9, both primary and backup SFP level instrument channels are fixed or permanently installed. Both instrument probes are permanently installed near opposite (northwest and southeast) corners of the SFP. The channel A display

and signal processor is located within the main control room. The channel B display and signal processor is located in the auxiliary building.

- b. Arrangement: The SFP level instrument channels shall be arranged in a manner that provides reasonable protection of the level indication function against missiles that may result from damage to the structure over the SFP. This protection may be provided by locating the primary instrument channel and fixed portions of the backup instrument channel, if applicable, to maintain instrument channel separation within the SFP area, and to utilize inherent shielding from missiles provided by existing recesses and corners in the SFP structure.**

Per References 3 and 4, and in accordance with the guidance of Section 3.2 of NEI 12-02, Revision 1, PNP primary and backup SFP level instrument probes are spatially separated and installed near opposite SFP corners. Corner locations provide inherent protection of the probes. Channel separation for cable routing away from the probes maintains the same relative spatial separation distance as the SFP corner mounting locations. Cable routing on the SFP floor is limited until exiting via a SFP area floor penetration (channel A) or wall penetration (channel B). Probe top section and channel cabling are protected by a metallic raceway and the probe mounting bracket structure itself, all of which incorporate a low profile design. Concrete curbs in the vicinity of the probes rise six inches above the floor elevation and provide additional protection. As described, reasonable protection of the SFP level instrumentation is provided from potential SFP area overhead structure missiles.

- c. Mounting: Installed instrument channel equipment within the SFP shall be mounted to retain its design configuration during and following the maximum seismic ground motion considered in the design of the SFP structure.**

Per References 3, 4, and 9, the PNP SFP instrument channels (equipment from the SFP to the main control room or the auxiliary building location) are mounted and designed to meet or exceed the requirements of PNP seismic design bases, seismic Category I requirements. As such, the SFP instrument channels are designed and installed to retain their design configuration during and following maximum requirements of the PNP seismic design bases.

- d. Qualification: The primary and backup instrument channels shall be reliable at temperature, humidity, and radiation levels consistent with the SFP water at saturation conditions for an extended period. This reliability shall be established through use of an augmented quality assurance process (e.g., a process similar to that applied to the site fire protection program).**

Per References 3, 4, and 9, the PNP SFP instrument channels (equipment from the SFP to the level processors and displays) are designed and qualified to PNP environmental extremes applicable for the area of interest (e.g., SFP, main control room, and C-40 panel room). The SFP area environmental extremes are in accordance with NEI 12-02, Revision 1, SFP example conditions (as summarized below). The SFP instrumentation channels have been designated as Augmented Quality per ENO processes covering procurement, design, and installation. Per ENO procedures, Augmented Quality refers to systems, structures, and components (SSCs) that have been designated as requiring additional quality level oversight or requirements beyond what would be required for non-safety related SSCs. As such,

the SFP instrument channels have demonstrated reliability through establishment of Augmented Quality processes at applicable environmental extremes.

<u>SFP Area Parameter</u>	<u>SFP Area NEI 12-02 Rev 1 Example Condition</u>	<u>SFP Area Qualification</u>
Radiation	SFP @ Water Level 3 (low) for 7-day min. event/post-event (or until FLEX strategy mitigation)	SFP @ Water Level 3 (low) for 7-day event/post-event (no credit for earlier FLEX mitigation)
	Fuel freshly discharged (100 Hours)	Full core off-load @ 100 hours remainder SFP @ 18 mo. (conservative)
	+ normal dose	SFP @ normal water level for 40 yr
Temperature	212°F	212°F
Humidity	100% (boiling borated water &/or steam)	100% (boiling bor. water &/or steam)

e. Independence: The primary instrument channel shall be independent of the backup instrument channel.

Per References 3, 4, and 8, PNP SFP instrument channels have highly reliable independent power sources (as detailed in the next section) and channel independence achieved by incorporation of two permanently installed, physically independent, and physically separated channels (with channel separation in accordance with existing plant design basis requirements). The channel A display and signal processor is located within the main control room and the channel B display and signal processor is located in the auxiliary building. As such, the SFP instrument channels are independent.

f. Power supplies: Permanently installed instrumentation channels shall each be powered by a separate power supply. Permanently installed and portable instrumentation channels shall provide for power connections from sources independent of the plant ac and dc power distribution systems, such as portable generators or replaceable batteries. Onsite generators used as an alternate power source and replaceable batteries used for instrument channel power shall have sufficient capacity to maintain the level indication function until offsite resource availability is reasonably assured.

Per References 3, 4, and 8, the two PNP SFP instrument channels are powered from separate 480VAC sources. Channel A is powered from 120VAC lighting panel L-25B, through existing 20A breaker #5, which is fed from motor control center (MCC) #1. Channel B is powered from 120VAC Lighting Panel L-76, through existing 20A breaker #12, which is fed from MCC #82. These two buses represent independent 480V power sources.

The two PNP SFP instrumentation channels incorporate channel-specific stand-alone backup battery power. The permanently installed replaceable and rechargeable backup batteries are configured for full event duration (e.g., seven days) or maximum offsite resource availability time frames, which is well beyond FLEX strategy restoration time frames.

A third power alternative is available via external connections and cables included for each battery panel supplying each SFP processor/display panel to permit powering the system from an external DC source independent of plant sources.

- g. Accuracy: The instrument channels shall maintain their designed accuracy following a power interruption or change in power source without recalibration.**

Per References 3, 4, and 9, the PNP SFP instrument channels have a reasonably high certified design accuracy of equal to or better than +/- three inches (excluding boric acid deposition effects which can produce a maximum error of 2.5 inches) which is not affected by power interruption as supported by vendor test documentation. As such, the SFP instrument channels have been documented to maintain their designed accuracy following power interruption or change in power source without recalibration being required.

- h. Testing: The instrument channel design shall provide for routine testing and calibration.**

Per References 3, 4, 8, and 9, the PNP SFP instrument channels automatically monitor the integrity of the measurement system using in-situ capability or on board diagnostics. The display unit generates system alerts and warnings in response to hardware and/or software problems that are encountered. Channel functional tests are periodically performed on the SFP instrument channels. The probe itself is a perforated tubular coaxial waveguide with defined geometry and is not calibrated. Channel design provides capability for calibration or validation against known/actual SFP level. As such, the SFP instrument channel's design provides for routine testing and calibration.

- i. Display: Trained personnel shall be able to monitor the SFP water level from the control room, alternate shutdown panel, or other appropriate and accessible location. The display shall provide on-demand or continuous indication of SFP water level.**

Per References 3, 4, 8, and 9, the channel A display and signal processor is located within the control room and the channel B display and signal processor is located in the auxiliary building, and will be readily accessible. Level is displayed continuously when on primary AC power and on-demand when on backup DC power. As such, the SFP water level indication can be monitored by trained personnel in the main control room or the auxiliary building either continuously or on-demand.

- 2. In accordance with NRC Order EA-12-051, the SFP instrumentation shall be maintained available and reliable through appropriate development and implementation of the following programs:**

- a. Training: Personnel shall be trained in the use and the provision of alternate power to the primary and backup instrument channels.**

Two PNP instrument and control maintenance technicians received training on the MOHR EFP-IL SFP Level Monitoring System at the vendor (MOHR) facilities to become subject matter experts (SMEs). The SMEs then provided training on the MOHR system at PNP for site instrument and control maintenance technicians. In

addition, ENO plans to provide refresher training to the technicians on the MOHR system every two years.

Training was provided to plant personnel, including Operations personnel, using training material number PLLP-OPS-FLEXOVER, titled "FLEX Process & Equipment." The training included discussions of Order EA-12-051, the new SFP level instruments installed, how the level instruments support the FLEX strategies, the locations of the two instrument display panels, and the external DC power source that can be used for the instruments.

On-site training was implemented in accordance with ENO training processes, which include the Systematic Approach to Training for both initial and continuing elements and the target audience.

b. Procedures: Procedures shall be established and maintained for the testing, calibration, and use of the primary and backup SFP instrument channels.

References 3, 4, 8, and 9 discussed procedure plans. The display/processor performs automatic in-situ diagnostics and automatically monitors for cable, connector, and probe faults using time domain reflectometry (TDR) technology. The PNP ORM was revised to include actions to be taken for the primary and back-up SFP level instruments should functionality be lost. PM activities have been established to calibrate the SFP level instrumentation on demand (based on internal instrument diagnostics), and to replace the batteries, in accordance with the ENO PM program. A new operating procedure was not required based on the simple indication function and use.

c. Testing and Calibration: Processes shall be established and maintained for scheduling and implementing necessary testing and calibration of the primary and backup SFP level instrument channels to maintain the instrument channels at the design accuracy.

A PM task has been established for scheduling and implementing necessary functional testing in accordance with ORM requirements. The testing provides for calibration or validation of the primary and backup SFP level instrument channels against known/actual SFP level to maintain the design accuracy within limits established. The testing also provides for SFP level instrument cross channel comparison. A functional check of the SFP level indicators is performed by Operations every seven days.

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. Entergy Nuclear Operations, Inc. 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)
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 12. 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, August 2012.