



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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10 CFR 50.54(f)

PNP 2019-001

March 20, 2019

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Request for Deferral of Actions Related to a Beyond-Design-Basis External Seismic Event

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

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued "Request for information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" to all NRC power reactor licensees and holders of construction permits in active or deferred status (Reference 1). Enclosure 1 in the 50.54(f) letter required actions associated with Recommendation 2.1: Seismic.

Enclosure 1 to Reference 1 requested that each licensee submit: (1) its intent to follow the developed guidance, or (2) an alternative approach including acceptance criteria. In Reference 2, the Entergy Nuclear Operations, Inc. (ENO) response contained the following commitment:

ENO intends to respond to Enclosure 1 of NRC letter to ENO, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012, by following the approach described in Nuclear Energy Institute (NEI) letter to NRC, *Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations*, dated April 9, 2013.

The completion date for this commitment was "On the schedule specified in the NEI letter dated April 9, 2013."

Enclosure 1 to Reference 1 also requested that licensees provide interim evaluations and actions taken or planned to address the higher seismic hazard relative to the design basis, as appropriate, prior to completion of a risk evaluation. In response, ENO submitted in

Reference 3 an Expedited Seismic Evaluation Process (ESEP) Report for PNP which demonstrated seismic margin through a review of a subset of the plant equipment that can be relied upon to protect the reactor core following beyond design basis seismic events. Due to the timing of the development of this report, certain equipment inside containment was inaccessible for verification walkdowns. Therefore, this submittal included the following commitment:

ENO will perform seismic walkdowns, generate High Confidence of Low Probability of Failure calculations, and design and implement any necessary modifications for inaccessible items listed in Section 7.1 of the Expedited Seismic Evaluation Process (ESEP) Report for Palisades Nuclear Plant.

The completion date for this commitment was September 30, 2019 (Reference 4).

In Reference 5, the NRC informed ENO that a Seismic Probabilistic Risk Assessment (SPRA) would be required for PNP, with a December 31, 2019 submittal due date. In Reference 6, the PNP SPRA due date was revised to September 30, 2019.

In Reference 7, ENO made the following commitment concerning the ESEP:

ENO will use the insights gained through the performance of the Seismic Probabilistic Risk Assessment for Palisades Nuclear Plant to determine what modifications, procedure changes, or strategy changes would provide the optimal safety improvement.

The completion date for this commitment was September 30, 2019.

In Reference 8, pursuant to 10 CFR 50.82(a)(1)(i) and 10 CFR 50.4(b)(8), ENO certified in a letter to the NRC that it plans to permanently cease power operations at the PNP no later than May 31, 2022.

In light of this decision, ENO is requesting deferral of the SPRA submittal date and the completion dates of the three referenced commitments associated with Enclosure 1 to Reference 1, until December 31, 2022, which is beyond the date that ENO plans to permanently cease power operations at PNP. Upon certification that fuel has been permanently removed from the reactor vessel, ENO will consider these actions to be no longer required.

Attachment 1 provides bases for the deferral requests. Attachment 2 identifies the affected commitments.

There are no new regulatory commitments contained in this letter.

Sincerely,



JAH/jse

- Attachments:
1. Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal and Revised Regulatory Commitment Completion Dates
 2. Requested Completion Dates for Regulatory Commitments

- References:
1. NRC letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (ADAMS Package Accession No. ML12056A046)
 2. Entergy Nuclear Operations, Inc. letter, PNP 2013-033, *Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated April 26, 2013 (ADAMS Accession No. ML13116A341)
 3. Entergy Nuclear Operations, Inc. letter, PNP 2014-108, *Palisades Nuclear Plant Expedited Seismic Evaluation Process Report (CEUS Sites), Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of the Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated December 18, 2014 (ADAMS Accession No. ML14357A165)
 4. Entergy Nuclear Operations, Inc. letter, PNP 2017-018, *Notification of Change to Regulatory Commitment Concerning NRC Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated April 13, 2017 (ADAMS Accession No. ML17103A007)
 5. NRC letter, *Screening and Prioritization Results Regarding Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Seismic Hazard Re-evaluations for Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated May 9, 2014 (ADAMS Accession No. ML14111A147)
 6. NRC letter, *Final Determination of Licensee Seismic Probabilistic Risk Assessments Under the Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 2.1 "Seismic" of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident*, dated October 27, 2015 (ADAMS Accession No. ML15194A015)
 7. Entergy Nuclear Operations, Inc. letter, PNP 2016-022, *Commitment Changes Concerning Palisades Nuclear Plant Modifications for Expedited Seismic Evaluation Process Report*, dated April 18, 2016 (ADAMS Accession No. ML16111B168)
 8. Entergy Nuclear Operations, Inc. letter, PNP 2017-065, *Supplement to Certification of Permanent Cessation of Power Operations*, dated October 19, 2017 (ADAMS Accession No. ML17292A032)

cc: NRC Director of Office of Nuclear Regulation
NRC Region III Regional Administrator
NRC Senior Resident Inspector - Palisades
NRC Project Manager - Palisades

PNP 2019-001

Attachment 1

**Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal
and Revised Regulatory Commitment Completion Dates**

Six pages follow

Attachment 1

Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal and Revised Regulatory Commitment Completion Dates

Discussion

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued “Request for information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident” to all NRC power reactor licensees and holders of construction permits in active or deferred status (Reference 1). Enclosure 1 to Reference 1 required actions associated with Recommendation 2.1: Seismic.

Enclosure 1 to Reference 1 requested a “60-day response” in which each licensee must submit: (1) its intent to follow the developed guidance, or (2) an alternative approach including acceptance criteria. In Reference 2, Entergy Nuclear Operations, Inc. (ENO) responded with the following commitment:

ENO intends to respond to Enclosure 1 of NRC letter to ENO, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012, by following the approach described in Nuclear Energy Institute (NEI) letter to NRC, *Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations*, dated April 9, 2013.

The completion date for this commitment was “On the schedule specified in the NEI letter dated April 9, 2013.”

Enclosure 1 to Reference 1 also requested that licensees provide interim evaluations and actions taken or planned to address the higher seismic hazard relative to the design basis, as appropriate, prior to completion of the risk evaluation. In response, Entergy Nuclear Operations, Inc. (ENO) submitted in Reference 3 an Expedited Seismic Evaluation Process (ESEP) report for PNP which assessed seismic margin through a review of a subset of the plant equipment that can be relied upon to protect the reactor core following beyond design basis seismic events. Due to the timing of the development of this report, certain equipment inside containment was inaccessible for verification walkdowns. Therefore, this submittal included the following commitment:

ENO will perform seismic walkdowns, generate High Confidence of Low Probability of Failure calculations, and design and implement any necessary modifications for inaccessible items listed in Section 7.1 of the Expedited Seismic Evaluation Process (ESEP) Report for Palisades Nuclear Plant.

The completion date for this commitment was September 30, 2019 (Reference 4).

In Reference 5, the NRC informed ENO that a Seismic Probabilistic Risk Assessment (SPRA) would be required for PNP, with a December 31, 2019 submittal due date. In Reference 6, the PNP SPRA due date was revised to September 30, 2019.

In Reference 7, ENO made the following commitment concerning the ESEP:

Attachment 1

Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal and Revised Regulatory Commitment Completion Dates

ENO will use the insights gained through the performance of the Seismic Probabilistic Risk Assessment for Palisades Nuclear Plant to determine what modifications, procedure changes, or strategy changes would provide the optimal safety improvement.

The completion date for this commitment was September 30, 2019.

In Reference 8, pursuant to 10 CFR 50.82(a)(1)(i) and 10 CFR 50.4(b)(8), ENO certified in a letter to the NRC that it plans to permanently cease power operations at the PNP no later than May 31, 2022.

In light of this decision, ENO is requesting deferral of the SPRA submittal date and the completion dates of the three referenced commitments associated with Enclosure 1 to Reference 1, until December 31, 2022, which is beyond the date that ENO plans to permanently cease power operations at PNP. Upon certification that fuel has been permanently removed from the reactor vessel, ENO will consider these actions to be no longer required.

Basis for SPRA Deferral

ENO is requesting deferral of the SPRA submittal date until December 31, 2022.

In References 9 and 10, ENO informed the NRC that the site had completed the actions required by NRC Orders EA-12-049 and EA-12-051. The completion of these orders provides PNP with tangible safety benefits that address the beyond design basis seismic risks. The orders require the ability to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in a beyond design basis seismic event.

In Reference 3, ENO performed an interim seismic evaluation for PNP and provided the results to the NRC in an ESEP report. The ESEP was performed as an interim action in response to Enclosure 1 to Reference 1 to demonstrate seismic margin. It demonstrated margin through a review of a subset of plant equipment that can be relied upon to protect the reactor core following beyond design basis seismic events. As a result of the ESEP, ENO modified the anchorage of the two boric acid storage tanks at PNP. The ESEP also determined that the primary makeup storage tank required modification to enhance its seismic capability. However, subsequent reviews of seismic risk have demonstrated that the tank is not risk significant and that modifications to increase the seismic capacity of the tank are not warranted from a risk reduction perspective.

In Reference 11, the NRC staff concluded that, through the implementation of the ESEP guidance, ENO identified and evaluated for PNP the seismic capacity of certain key installed mitigating strategies equipment that is used for core cooling and containment functions. The equipment used to cope with scenarios that involve a loss of all alternating current power and a loss of access to the ultimate heat sink were evaluated to withstand a seismic event two times the safe shutdown earthquake. It also concluded that the PNP ESEP assessment provides additional assurance which supports continued plant safety while the longer-term seismic evaluation is completed to support regulatory decision making.

In Reference 12, the NRC noted that NEI provided an EPRI seismic study that concluded that site-specific seismic hazards show that there has not been an overall increase in seismic risk for

Attachment 1

Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal and Revised Regulatory Commitment Completion Dates

plants and that the current seismic design of operating reactors continues to provide a safety margin to withstand potential earthquakes exceeding the seismic design basis.

In addition, Reference 12 cited a NEI letter that provided "Perspectives on the Seismic Capacity of Operating Plants," which concluded that the SSCs used in nuclear power plants are intentionally designed using conservative methods and criteria to ensure that they have margins well above the required design bases. It also concluded that the ruggedness resulting from these margins has been demonstrated in actual earthquake experiences at nuclear power plants and other industrial facilities, and that this experience has shown engineered facilities perform well at earthquake ground motions even beyond their design levels.

The NRC reviewed each licensee's interim seismic evaluation results and the EPRI study, and confirmed that the plants can continue to operate while additional evaluations are conducted.

The intent of the SPRA is described in Reference 12, which states:

Seismic Risk Evaluation - Longer-term seismic risk evaluation provides the most comprehensive information to make regulatory decisions, such as whether to amend a plant's design or licensing basis or make additional safety enhancements. These evaluations provide information to make risk-informed decisions. The staff will use this information in conjunction with the existing regulatory tools, such as backfit analysis, to decide on further regulatory actions. The longer-term seismic risk evaluations could be either a Seismic Margins Analysis or a Seismic Probabilistic Risk Assessment, depending on the magnitude of the exceedance.

Therefore, the SPRA is intended to provide information for making decisions on regulatory actions.

The PNP SPRA submittal is currently due by September 30, 2019. However, as discussed in Reference 8, PNP will permanently cease power operations no later than May 31, 2022, and there is only one PNP refueling outage scheduled prior to the planned permanent shutdown date. Considering the SPRA due date, the time required for NRC review of the SPRA, the time for the NRC decision process, the issuing of actions, and the limited time for ENO to evaluate, design, schedule, and implement these actions, there is insufficient time for the SPRA effort to result in an actual appreciable safety benefit for PNP.

Basis for Request for Deferral of Regulatory Commitment Completion Dates

ENO is requesting deferral of the completion dates for the three commitments described below. The requested completion date for each of the commitments is December 31, 2022.

Reference 1 requested a 60-day response in which each licensee must submit: (1) its intent to follow the developed guidance, or (2) an alternative approach, including acceptance criteria. In Reference 2, Entergy Nuclear Operations, Inc. (ENO) responded with the following commitment:

ENO intends to respond to Enclosure 1 of NRC letter to ENO, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012, by following the approach

Attachment 1

Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal and Revised Regulatory Commitment Completion Dates

described in Nuclear Energy Institute (NEI) letter to NRC, *Proposed Path Forward for NTF Recommendation 2.1: Seismic Reevaluations*, dated April 9, 2013.

The completion date for this commitment was “On the schedule specified in the NEI letter dated April 9, 2013.”

In Reference 3, ENO submitted an ESEP report for PNP. This submittal included the following commitment:

ENO will perform seismic walkdowns, generate High Confidence of a Low Probability of Failure calculations, and design and implement any necessary modifications for inaccessible items listed in Section 7.1 of the Expedited Seismic Evaluation Process (ESEP) Report for Palisades Nuclear Plant.

The completion date for this commitment was September 30, 2019 (Reference 4).

Even though extension of the scheduled completion date for this commitment is requested, work to complete the actions described in this commitment is essentially complete. The seismic walkdowns for inaccessible items have been completed, the HCLPF calculations have been developed and reviewed by ENO, and no additional modifications have been identified as a result of this work. A draft of the updated ESEP report has been developed.

In Reference 7, ENO made the following commitment:

ENO will use the insights gained through the performance of the Seismic Probabilistic Risk Assessment for Palisades Nuclear Plant to determine what modifications, procedure changes, or strategy changes would provide the optimal safety improvement.

The completion date for this commitment was September 30, 2019.

As discussed previously, ENO is requesting deferral of the SPRA submittal date until December 31, 2022.

These three commitments involve beyond design basis seismic events. As such, the requested completion dates for these commitments would not significantly impact the ability of affected systems, structures, or components (SSCs) to perform their specified design basis safety functions or impact the ability of plant personnel to ensure that SSCs are capable of performing their design basis specified safety functions. Moreover, the revised commitment completion dates would not involve a significant increase in the probability or consequences of a design basis accident previously evaluated, would not create the possibility of a new or different kind of design basis accident from any previously evaluated, and would not involve a significant reduction in a margin of safety within the design basis.

As discussed in the basis for the SPRA deferral, the PNP ESEP demonstrated seismic margin through evaluations of plant equipment that can be relied upon to protect the reactor core following beyond design basis seismic events, and provides additional assurance which supports continued plant safety while the longer-term seismic evaluation is completed to support regulatory decision making. The ESEP determined that modification of the primary makeup storage tank was required to enhance seismic capability, but subsequent reviews of seismic risk

Attachment 1

Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal and Revised Regulatory Commitment Completion Dates

have demonstrated that the tank is not risk significant and that modifications to increase the seismic capacity of the tank would not be justifiable on a risk reduction basis.

In addition, as discussed in the basis for the SPRA deferral, an EPRI seismic study concluded that site-specific seismic hazards show there has not been an overall increase in seismic risk for plants and that the current seismic design of operating reactors continues to provide a safety margin to withstand potential earthquakes exceeding the seismic design basis. Furthermore, the SSCs used in nuclear power plants are intentionally designed using conservative methods and criteria to ensure that they have margins well above the required design bases.

The NRC reviewed each licensee's interim seismic evaluation results and the EPRI study, and confirmed that the plants can continue to operate while additional evaluations are conducted.

References

1. NRC letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (ADAMS Package Accession No. ML12056A046)
2. Entergy Nuclear Operations, Inc. letter, PNP 2013-033, *Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated April 26, 2013 (ADAMS Accession No. ML13116A341)
3. Entergy Nuclear Operations, Inc. letter, PNP 2014-108, *Palisades Nuclear Plant Expedited Seismic Evaluation Process Report (CEUS Sites), Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated December 18, 2014 (ADAMS Accession No. ML14357A165)
4. Entergy Nuclear Operations, Inc. letter, PNP 2017-018, *Notification of Change to Regulatory Commitment Concerning NRC Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated April 13, 2017 (ADAMS Accession No. ML17103A007)
5. NRC letter, *Screening and Prioritization Results Regarding Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Seismic Hazard Re-evaluations for Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated May 9, 2014 (ADAMS Accession No. ML14111A147)
6. NRC letter, *Final Determination of Licensee Seismic Probabilistic Risk Assessments Under the Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 2.1 "Seismic" of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated October 27, 2015 (ADAMS Accession No. ML15194A015)

Attachment 1

Bases for Requested Deferral of Seismic Probabilistic Risk Assessment Submittal and Revised Regulatory Commitment Completion Dates

7. Entergy Nuclear Operations, Inc. letter, PNP 2016-022, *Commitment Changes Concerning Palisades Nuclear Plant Modifications for Expedited Seismic Evaluation Process Report*, dated April 18, 2016 (ADAMS Accession No. ML16111B168)
8. Entergy Nuclear Operations, Inc. letter, PNP 2017-065, Supplement to Certification of Permanent Cessation of Power Operations, dated October 19, 2017 (ADAMS Accession No. ML17292A032)
9. Entergy Nuclear Operations, Inc. letter, PNP 2015-083, *Notification of Full Compliance with NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events,"* dated December 16, 2015 (ADAMS Accession Number ML15351A369)
10. Entergy Nuclear Operations, Inc. letter, PNP 2015-084, *Notification of Full Compliance with NRC Order EA-12-051, "Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,"* dated December 16, 2015 (ADAMS Accession Number ML15351A126)
11. NRC letter, *Palisades Nuclear Plant – Staff Review of Interim Evaluation Associated with Reevaluated Seismic Hazard Implementing Near-Term Task Force Recommendation 2.1*, dated August 25, 2015 (ADAMS Accession Number ML15233A101)
12. NRC letter, *Screening and Prioritization Results Regarding Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Seismic Hazard Re-evaluations for Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated May 9, 2014 (ADAMS Accession Number ML14111A147)

PNP 2019-001

Attachment 2

Revised Completion Dates for Regulatory Commitments

Two pages follow

Attachment 2

Requested Completion Dates for Regulatory Commitments

The following table identifies an actions committed to by Entergy Nuclear Operations, Inc. (ENO). Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

| Original Commitment | Original Completion Date | Source of Original Commitment | Requested Completion Date |
|---|--|---|---------------------------|
| <p>ENO intends to respond to Enclosure 1 of NRC letter to ENO, <i>Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident</i>, dated March 12, 2012, by following the approach described in Nuclear Energy Institute (NEI) letter to NRC, <i>Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations</i>, dated April 9, 2013.</p> | <p>On the schedule specified in the NEI letter dated April 9, 2013</p> | <p>ENO letter, PNP 2013-033, <i>Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident</i>, dated April 26, 2013 (ADAMS Accession No. ML13116A341)</p> | <p>December 31, 2022</p> |
| <p>ENO will perform seismic walkdowns, generate High Confidence of Low Probability of Failure calculations, and design and implement any necessary modifications for inaccessible items listed in Section 7.1 of the Expedited Seismic Evaluation Process (ESEP) Report for Palisades Nuclear Plant.</p> | <p>September 30, 2019</p> | <p>ENO letter, PNP 2017-018, <i>Notification of Change to Regulatory Commitment Concerning NRC Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident</i>, dated April 13, 2017 (ADAMS Accession No. 17103A007)</p> | <p>December 31, 2022</p> |

Attachment 2

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|--|---------------------------|---|--------------------------|
| <p>ENO will use the insights gained through the performance of the Seismic Probabilistic Risk Assessment for Palisades Nuclear Plant to determine what modifications, procedure changes, or strategy changes would provide the optimal safety improvement.</p> | <p>September 30, 2019</p> | <p>ENO letter, PNP 2016-022, <i>Commitment Changes Concerning Palisades Nuclear Plant Modifications for Expedited Seismic Evaluation Process Report</i>, dated April 18, 2016 (ADAMS Accession No. ML16111B168)</p> | <p>December 31, 2022</p> |
|--|---------------------------|---|--------------------------|