



May 5, 2005

10 CFR 54

U. S. Nuclear Regulatory Commission  
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Palisades Nuclear Plant  
Docket 50-255  
License No. DPR-20

Supplementary Information to Support the Application for Renewed Operating License  
for the Palisades Nuclear Plant

In a letter dated March 22, 2005, Nuclear Management Company, LLC (NMC) submitted an application for renewal of the operating license for the Palisades Nuclear Plant. This letter provides additional information supplementing the application.

NMC has determined that the summary listing of component types for Engineered Safety Features (ESF) provided in Table 2.3.2-1 did not specify certain component types which were and are included in scoping and screening, and were subject to aging management review. These component types (piping and fittings, pumps, spray nozzles, and trisodium phosphate baskets) are shown as in-scope for license renewal in the Scoping Boundary Drawings for Safety Injection, Containment Spray and Shutdown Cooling (LR-M-204-1, LR-M-204-1A, LR-M-204-1B, LR-M-203-1 and LR-M-203-2), that were submitted in support of the application, and referenced on page 2-78. These component types are also listed as being subject to aging management review in the text of Section 2.3.2 on page 2-71 of the application.

Accordingly, this letter revises Table 2.3.2-1 of the application to include the additional component types. Piping and fittings, pumps, spray nozzles, and trisodium phosphate baskets have been added to the table as separate line items. The additional line items to be added to Table 2.3.2-1 are provided in Enclosure 1. To be consistent with Table 2.3.2-1, Table 3.2.2-1 is also revised to add the corresponding aging management review results for these component types. The additional line items to be added to Table 3.2.2-1 are provided in Enclosure 2. It has been concluded that the addition of these line items does not result in the need to revise Table 3.2.1 or other text related to ESF.

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NMC has also reviewed the other Section 2 mechanical and civil/structural summary tables for similar inconsistencies. This review identified the need to incorporate additional component types in Table 2.3.3-1 for the Chemical and Volume Control System (CVCS). Similar to ESF, these component types are shown in the referenced Scoping Boundary Drawings as being in-scope, and the text in Section 2.3.3.1 on page 2-83 lists the component types as being subject to aging management review, but the component types were not itemized in the table. Therefore, Enclosure 1 also includes line items for pumps and accumulators to be added to Table 2.3.3-1, and Enclosure 2 includes the corresponding aging management review results in Table 3.3.2-1 for these component types. It has been concluded that the addition of these line items does not result in the need to revise Table 3.3.1 or other text related to CVCS.

As a separate issue, NMC has revisited the need for two Time-Limited Aging Analyses (TLAA) discussions included as Sections 4.7.3 and 4.7.4 of the application. NMC had included these discussions under a very conservative interpretation of the TLAA criteria in 10 CFR 54.3(a). Upon further review it has been concluded that the issues do not meet the 10 CFR 54.3(a) criteria for a TLAA. The Section 4.7.3 discussion of Code Case N-481 is unnecessary since this code case will no longer be in use when the plant enters the period of extended operation. The Risk Informed Inservice Inspection Program calculations discussed in Section 4.7.4 were used for determining inspection intervals. The risk at any point in time is unaffected by this evaluation, and is not time-limited. Accordingly, this letter hereby withdraws the information in Sections 4.7.3 and 4.7.4, and replaces the section titles with "Not Used." The titles for these section numbers in Table 4.1-1 are also changed to "Not Used," and the disposition information is deleted. To conform with these changes, Appendix A, Sections A4.5.3 and A4.5.4, are also deleted.

NMC understands that the need to provide this supplementary information may cause some limited impact on the overall review schedule. Please contact Mr. Darrel Turner, License Renewal Project Manager, at 269-764-2412, or Mr. Robert Vincent, License Renewal Licensing Lead, at 269-764-2559, if you require additional information.

#### Summary of Commitments

This letter contains no new commitments or changes to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 5, 2005.



for

Daniel J. Malone  
Site Vice President, Palisades Nuclear Plant  
Nuclear Management Company, LLC

Enclosures (2)

CC Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC  
License Renewal Project Manager, Palisades, USNRC

**ENCLOSURE 1**

**Supplementary Information for Application for Renewed Operating License -  
Palisades Nuclear Plant**

Table 2.3.2-1 Additions  
Table 2.3.3-1 Additions

**Enclosure 1**  
**Supplementary Information for Application for Renewed Operating License -**  
**Palisades Nuclear Plant**

Additions to Palisades Application for Renewed Operating License for  
Table 2.3.2-1 Engineered Safeguards System

<b>Component Group</b>	<b>Intended Function</b>
Piping and fittings	Fluid Pressure Boundary
Pumps	Fluid Pressure Boundary
Spray Nozzles	Spray Pattern
TriSodium Phosphate Baskets	Structure Functional Support

Additions to Palisades Application for Renewed Operating License for  
Table 2.3.3-1 Chemical and Volume Control System

<b>Component Group</b>	<b>Intended Function</b>
Pumps	Fluid Pressure Boundary
Accumulators	Fluid Pressure Boundary

**ENCLOSURE 2**

**Supplementary Information for Application for Renewed Operating License -  
Palisades Nuclear Plant**

Table 3.2.2-1 Additions  
Table 3.3.2-1 Additions

**Enclosure 2**

**Supplementary Information for Application for Renewed Operating License - Palisades Nuclear Plant**

Additions to Table 3.2.2-1 Engineered Safety Features - Engineered Safeguards System - Summary of Aging Management Evaluation

Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG - 1801 Volume 2 Line Item	Table 1 Item	Notes
Piping and Fittings	Fluid Pressure boundary	Stainless Steel	Treated Water (Int)	Cracking	Water Chemistry Program	V.D1.1-a	3.2.1-15	A, 214
					One Time Inspection Program	V.D1.1-a	3.2.1-15	A, 214
				Loss of Material	Water Chemistry Program	V.D1.1-a	3.2.1-05	H, 205, 214
					One Time Inspection Program	V.D1.1-a	3.2.1-05	H, 205, 214
Pumps	Fluid Pressure Boundary	Stainless Steel	Treated Water (Int)	Loss of Material	Water Chemistry Program	V.D1.2-a	3.2.1.05	H, 205, 214, 215
					One-Time Inspection Program	V.D1.2-a	3.2.1.05	H, 205, 214, 215
Spray Nozzles	Spray Pattern	Stainless Steel	Air (Int)	None	None Required			F, 208, 214
TriSodium Phosphate Baskets	Structure Functional Support	Stainless Steel	Containment Air (Ext)	None	None Required			J, 213, 214

**NOTES:**

- Note 205 Palisades manages pitting and crevice corrosion.
- Note 208 Palisades spray nozzles are stainless steel. GALL indicates carbon steel.
- Note 213 Component is not in GALL.
- Note 214 This row was added to the original application in a supplemental letter.
- Note 215 This component normally operates at below 140 degrees F. Therefore, SCC is not an applicable aging mechanism.

**Enclosure 2**

**Supplementary Information for Application for Renewed Operating License - Palisades Nuclear Plant**

**Additions to Table 3.3.2-1 Auxiliary Systems - Chemical and Volume Control System - Summary of Aging Management Evaluation**

<b>Component Type</b>	<b>Intended Function</b>	<b>Material</b>	<b>Environment</b>	<b>Aging Effect Requiring Management</b>	<b>Aging Management Programs</b>	<b>NUREG -1801 Volume 2 Line Item</b>	<b>Table 1 Item</b>	<b>Notes</b>
Accumulators	Fluid Pressure boundary	Stainless Steel	Treated Water (Int)	Loss of Material	Water Chemistry Program			F, 333, 382, 397
					One-Time Inspection Program			F, 333, 382, 397
Pumps	Fluid Pressure Boundary	Stainless Steel	Treated Water (Int)	Loss of Material	Water Chemistry Program	VII.E1.5-a	3.3.1-04	H, 333, 398
					One-Time Inspection Program	VII.E1.5-a	3.3.1-04	H, 333, 398

**NOTE TEXT REPLACEMENTS**

- Note 333 This line item was added to the original application in a supplemental letter.
- Note 382 This line item includes all tanks in the CVC system except Boric Acid Storage Tanks.
- Note 397 GALL component material is carbon steel.
- Note 398 GALL identifies cracking. However, temperature is <140°F. Therefore, cracking is not an aging effect. Palisades item has loss of material.