



Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530  
Tel 269 764 2000

---

Anthony J Vitale  
Site Vice President

PNP 2014-097

November 4, 2014

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

**SUBJECT:** Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors

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

- References:
1. ENO letter, PNP 2012-106, "License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors," dated December 12, 2012 (ADAMS Accession Number ML12348A455)
  2. ENO letter, PNP 2013-013, "Response to Clarification Request — License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors," dated February 21, 2013 (ADAMS Accession Number ML13079A090)
  3. NRC electronic mail of August 8, 2013, "Palisades - Requests for Additional Information Regarding Transition to the Fire Protection Program to NFPA Standard 805 (TAC No. MF0382)" (ADAMS Accession Number ML13220B131)

**Attachment 2 contains ~~Security-Related Information~~  
~~to be withheld from Public Disclosure in accordance with 10 CFR 2.390.~~  
Upon removal of Attachment 2, this letter is uncontrolled.**

4. ENO letter, PNP 2013-075, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated September 30, 2013 (ADAMS Accession Number ML13273A469)
5. ENO letter, PNP 2013-079, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated October 24, 2013 (ADAMS Accession Number ML13298A044)
6. ENO letter, PNP 2013-083, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated December 2, 2013 (ADAMS Accession Number ML13336A649)
7. NRC electronic mail of March 11, 2014, "Requests for Additional Information – Palisades – NFPA 805 Project LAR - MF0382" (ADAMS Accession Number ML14118A293)
8. ENO letter, PNP 2014-035, "Revised Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated April 2, 2014 (ADAMS Accession Number ML14092A126)
9. ENO letter, PNP 2014-050, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated May 7, 2014 (ADAMS Accession Number ML14127A152)
10. NRC electronic mail of May 21, 2014, "Requests for Additional Information – PRA - Palisades – NFPA 805 LAR - MF0382" (ADAMS Accession Number ML14142A104)
11. ENO letter, PNP 2014-063, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors", dated June 17, 2014 (ADAMS Accession Number ML14169A046)
12. ENO letter, PNP 2014-080, "Response to Request for Additional Information – License Amendment Request to Adopt NFPA 805

Performance-Based Standard for Fire Protection for Light Water Reactors", dated August 14, 2014 (ADAMS Accession No. ML14226A498)

13. NRC electronic mail of October 21, 2014, "Palisades: NFPA 805 Clarifying Questions" (ADMAS Accession Number ML14296A478)

Dear Sir or Madam:

In Reference 1, Entergy Nuclear Operations, Inc. (ENO) submitted a license amendment request to adopt the NFPA 805 performance-based standard for fire protection for light water reactors. In Reference 2, ENO responded to a clarification request. In Reference 3, ENO received electronic mail Request for Additional Information (RAIs). In Reference 4, ENO submitted the 60-day RAI responses. In Reference 5, ENO submitted the revised 90-day RAI responses. In Reference 6, ENO submitted the 120-day RAI responses. In Reference 7, ENO received electronic mail RAIs on Fire Modeling. In Reference 8, ENO submitted the revised response to RAI SSA 07. In Reference 9, ENO submitted responses to the Fire Modeling RAIs. In Reference 10, ENO received electronic mail RAIs on Fire Probabilistic Risk Assessment (PRA). In Reference 11, ENO submitted responses to the round 2 PRA 30-day RAIs. In Reference 12, ENO submitted responses to the round 2 PRA 90-day RAIs. In Reference 13, ENO received electronic mail RAIs on Fire PRA.

In Attachment 1, ENO is providing responses to the RAIs received in Reference 13.

In Attachment 2, ENO is providing an update to Attachment S, Table S-3. This updated Attachment S, Table S-3 supercedes, in its entirety, the Attachment S, Table S-3, that was submitted in Reference 12. Attachment 2 contains security-related information and should be withheld from public disclosure under 10 CFR 2.390.

A copy of this response has been provided to the designated representative of the State of Michigan.

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 4, 2014.

Sincerely,



ajv/jpm

**Attachments:**

1. **Response to Request for Additional Information Regarding License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors**
2. **Updated Attachment S, Table S-3 – Implementation Items**

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