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**Mandy K. Halter**  
Director, Nuclear Licensing

PNP 2018-025

September 27, 2018

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

SUBJECT: License Amendment Request – Application to Revise Technical Specifications to Adopt TSTF-425, Revision 3, “Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5b”

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

- REFERENCES:
1. Nuclear Energy Institute (NEI) 04-10, Revision 1, *Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies*, dated April 2007 (NRC ADAMS Accession Number ML071360456)
  2. Technical Specifications Task Force letter to the NRC, *Transmittal of TSTF-425, Revision 3, “Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b,”* dated March 18, 2009 (NRC ADAMS Package Accession Number ML090850642)
  3. Federal Register Notice of Availability, 74 FR 31996, *Notice of Availability of Technical Specification Improvement to Relocate Surveillance Frequencies to Licensee Control – Risk-Informed Technical Specification Task Force (RITSTF) Initiative 5b, Technical Specification Task Force-425, Revision 3*, dated July 6, 2009
  4. NRC letter to Technical Specifications Task Force, *Notification of Issue with NRC-Approved Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision 3, “Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b,”* dated April 14, 2010 (NRC ADAMS Accession Number ML100990099)

Dear Sir or Madam:

Pursuant to Title 10 of the Code of Federal Regulations, Part 50, Section 90 (10 CFR 50.90), *Application for amendment of license, construction permit, or early site permit*, Entergy Nuclear Operations, Inc. (ENO) hereby requests Nuclear Regulatory Commission (NRC) review and approval of a proposed amendment to revise the Renewed Facility Operating License (RFOL) DPR-20 for the Palisades Nuclear Plant (PNP).

ENO proposes to revise PNP RFOL Appendix A, Technical Specifications (TS), by relocating specific surveillance frequencies to a licensee controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, *Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies*" (Reference 1). This request is consistent with Technical Specification Task Force (TSTF)-425, Revision 3, *Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b* (Reference 2). TSTF-425 was made available for all nuclear power plants by the Federal Register Notice of Availability published on July 6, 2009 (Reference 3). This request also incorporates the changes to traveler TSTF-425 recommended by NRC letter, *Notification of Issue with NRC-Approved Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5"* (Reference 4).

Attachment 1 provides a description and evaluation of the proposed TS changes, the confirmation of TSTF-425 applicability, and plant-specific variations. Attachment 2 provides documentation of PNP's probabilistic risk assessment (PRA) technical adequacy. Attachment 3 provides the existing TS pages marked up to show the proposed changes. Attachment 4 provides revised (clean) TS pages. Attachment 5 provides TS Bases pages marked up to show the associated TS Bases changes and is provided for information only. Attachment 6 provides the no significant hazards consideration analysis. Attachment 7 provides a TSTF-425 traveler surveillance requirement (SR) versus PNP RFOL TS SR applicability cross reference table.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a), *Notice for public comment*, subparagraph (1), using the standards in 10 CFR 50.92, *Issuance of amendment*, paragraph (c), and it has been determined that the changes involve no significant hazards consideration. The basis for this determination is included in Attachment 6.

ENO requests approval of the proposed license amendment by September 30, 2019, and an implementation period of 90 days after the effective date of the amendment.

In accordance with 10 CFR 50.91(b), *State consultation*, ENO is notifying the State of Michigan of this proposed license amendment by transmitting a copy of this letter, with attachments, to the designated State of Michigan official.

This letter identifies no new regulatory commitments and no revisions to existing regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 27, 2018.

Sincerely,

A handwritten signature in black ink that reads "Mandy K. Hatter". The signature is written in a cursive style with a large, prominent 'M' and 'H'.

MKH/jpm

- Attachments:
1. Description and Evaluation of Technical Specifications Changes
  2. Palisades Nuclear Plant Probabilistic Risk Assessment Technical Adequacy
  3. Proposed Changes to Palisades Plant Renewed Facility Operating License DPR-20 and Appendix A Technical Specifications Pages
  4. Page Change Instructions and Revised Pages for the Palisades Plant Renewed Facility Operating License DPR-20 and Appendix A Technical Specifications
  5. Proposed Technical Specification Bases Changes (for information only)
  6. No Significant Hazards Consideration
  7. Traveler TSTF-425 Versus Palisades Nuclear Plant (PNP) Renewed Facility Operating License (RFOL) Surveillance Requirement (SR) Applicability Cross Reference Table

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