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PNP 2018-043

October 16, 2018

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

SUBJECT: Palisades Nuclear Plant Site Emergency Plan (Revision 31)

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

Dear Sir or Madam:

Pursuant to Title 10 of the Code of Federal Regulations (10 CFR), Section 50.54(q), *Emergency plans*, Entergy Nuclear Operations, Inc. is submitting a revision to the Palisades Nuclear Plant Site Emergency Plan (SEP).

The changes to the SEP were analyzed as required by 10 CFR 50.54(q)(3). The analyses concluded that the changes do not reduce the effectiveness of the SEP, and the SEP, as revised, continues to comply with the standards of 10 CFR 50.47, *Emergency plans*, paragraph (b), and the requirements of 10 CFR 50, Appendix E, *Emergency Planning and Preparedness for Production and Utilization Facilities*.

Summaries of the analyses of the changes, as required by 10 CFR 50.54(q)(5), are provided in the attachment.

The updated SEP (Revision 31) is provided in the enclosure.

This submittal contains no new or revised commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "JAH", with a stylized flourish at the end.

JAH/jse

Attachment: Palisades Nuclear Plant Site Emergency Plan Revision Analysis Summary

Enclosure: Palisades Nuclear Plant Site Emergency Plan, Revision 31

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

Attachment

**Palisades Nuclear Plant Site Emergency Plan
Revision Analysis Summary**

Palisades Nuclear Plant (PNP) Site Emergency Plan (SEP), Revision 31, was issued on September 25, 2018.

This SEP revision was analyzed under Title 10 of the Code of Federal Regulations (10 CFR), Section 50.54(q), *Emergency plans*. Pursuant to 10 CFR 50.4, *Written communications*, paragraph (b)(5)(ii), and 10 CFR 50.54(q), *Emergency plans*, paragraph (5), a summary of the 10 CFR 50.54(q) analysis is provided below.

DESCRIPTION OF CHANGES

The SEP was revised as follows:

1. In Sections 6.2.3 and 7.7.1.a, and in Appendix D, *thermoluminescent dosimeters* and *TLDs* were replaced by *dosimetry* to encompass the various types of dosimetry used at the site. This administrative change aligns the SEP with the terminology used in site procedures.
2. Section 7.8.6.c was revised to reflect that the primary process for refilling self-contained breathing apparatus (SCBA) tanks was changed from using vendor-owned equipment to using site-owned equipment, although this service can still be provided by a vendor if needed. Using site-owned equipment allows the SCBA tanks to be refilled more expeditiously.
3. Section 6.5.2 was revised to reflect relocations of the site decontamination facility and equipment. The relocated facility and equipment continues to have the same readiness and availability for personnel decontamination.

DESCRIPTION OF HOW THE CHANGES STILL COMPLY WITH REGULATIONS

None of these proposed changes impact emergency planning program elements or functions. Standard 10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment be provided and maintained to support the emergency response. Standard 10 CFR 50.47(b)(11) requires that means be established for controlling radiological exposures for emergency workers. These standards continue to be met because the site remains capable of refilling SCBA tanks to provide non-contaminated breathing air during emergencies and because decontamination equipment and supplies continue to be provided and maintained to minimize personnel exposure. Appendix E of 10 CFR 50 requires that adequate provisions be made for decontamination facilities and supplies, and this requirement continues to be met.

Therefore, with these changes, the SEP continues to comply with the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Attachment

**Palisades Nuclear Plant Site Emergency Plan
Revision Analysis Summary**

**DESCRIPTION OF WHY THE CHANGES WERE NOT A REDUCTION IN THE
EFFECTIVENESS OF THE SEP**

The changes do not affect the purpose, scope, or intent of the SEP. None of the proposed changes impact emergency planning program elements or functions. Adequate emergency facilities and equipment to support onsite emergency response continue to be provided and maintained. The site continues to be capable of refilling SCBA tanks to provide non-contaminated breathing air during emergencies, and decontamination equipment and supplies continue to be provided and maintained to minimize personnel exposure.

These SEP changes do not represent a reduction in the effectiveness of the emergency plan per 10 CFR 50.54(q)(3), and therefore were implemented without prior NRC approval.