



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

Anthony J. Vitale
Site Vice President

PNP 2012-091

October 25, 2012

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

SUBJECT: Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

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

- References:**
1. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 [ADAMS Accession Number ML12054A736]
 2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012 [ADAMS Accession Number ML12229A174]
 3. Nuclear Energy Institute (NEI) Letter to NRC, "Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)," dated February 24, 2012
 4. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012 [ADAMS Accession Number ML12242A378]

Dear Sir or Madam:

On March 12, 2012, the NRC issued an order (Reference 1) to Entergy Nuclear Operations, Inc. (ENO). This order was immediately effective and directed ENO to develop, implement, and maintain guidance and strategies to maintain or restore core

cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012.

The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms ENO has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestone schedule through completion of installation and testing:

- A project milestone schedule will be provided with the overall integrated plan. Implementation of the order will be completed for Palisades Nuclear Plant prior to startup from refueling outage 1R24 (scheduled Spring 2015).

This letter contains no new regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 25, 2012.

Sincerely,


ajv/jse

cc: U. S. Nuclear Regulatory Commission
Attn: Director, Office of Nuclear Reactor Regulation
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

U. S. Nuclear Regulatory Commission
Attn: Mac Chawla, Project Manager, Palisades
1155 Rockville Pike
Rockville, MD 20852

U. S. Nuclear Regulatory Commission
Attn: Region III Administrator
2443 Warrenville Rd Suite 210
Lisle, IL 60532-4352

U. S. Nuclear Regulatory Commission
Attn: Resident Inspector, Palisades
27880 Blue Star Highway
Covert, MI 49043

U. S. Nuclear Regulatory Commission
Attn: Robert J. Fretz Jr.
OWFN, Mailstop # 4A15A
11555 Rockville Pike
Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission
Attn: Robert L. Dennig
OWFN, Mailstop # 10E1
11555 Rockville Pike
Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission
Attn: Ms. Jessica A. Kratchman
OWFN, Mailstop # 9D2
11555 Rockville Pike
Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission
Attn: Mr. Eric E. Bowman
OWFN, Mailstop # 12D20
11555 Rockville Pike
Rockville, MD 20852-2378

U. S. Nuclear Regulatory Commission
Attn: Ms. Eileen M. McKenna
TWFN, Mailstop # 10D5
11555 Rockville Pike
Rockville, MD 20852-2378