



September 20, 2005

10 CFR 72.7

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

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

Supplement To Exemption Request From 10 CFR 72.212(b)(7),
10 CFR 72.212(b)(2)(i)(A), and 10 CFR 72.214

On August 22, 2005, Nuclear Management Company, LLC (NMC) requested Nuclear Regulatory Commission (NRC) review and approval of a proposed exemption request for the Palisades Nuclear Plant (PNP). NMC proposed an exemption from the requirements of 10 CFR 72.212, "Conditions of general license issued under §72.210," and 10 CFR 72.214, "List of approved spent fuel storage casks." This proposed exemption is needed to support future loading of independent spent fuel storage installation (ISFSI) casks at the PNP, which would provide enough space in the spent fuel pool to re-establish full core off-load capability.

Specific exemption was requested from the requirements of 10 CFR 72.212(b)(7), 10 CFR 72.212(b)(2)(i)(A), and 10 CFR 72.214. However, an additional exemption from the requirement of 10 CFR 72.212(a)(2) was inadvertently omitted from the August 22, 2005 exemption request.

Therefore, pursuant to 10 CFR 72.7, "Specific Exemption," NMC is requesting specific exemption for the PNP from the requirement of 10 CFR 72.212(a)(2), which states, "This general license is limited to storage of spent fuel in casks approved under the provisions of this part." The listing of Certificate of Compliance (CoC) amendment numbers is provided in 10 CFR 72.214. The exemption would allow NMC to store fuel under the general license requirements of 10 CFR 72.212 in the NUHOMS®-32PT model cask, using the proposed Amendment No. 8, prior to the effective date of the final rule change to 10 CFR 72.214, to add this model cask to the listing for CoC No. 1004.

The duration of the additional proposed exemption is requested for the period covering the upcoming cask loading schedule for loading seven NUHOMS®-32PT cask systems

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and would expire 90 days following the effective date of the final rule change to 10 CFR 72.214, to incorporate CoC No. 1004, Amendment No. 8.

10 CFR 72.7 allows licensees to apply for exemptions, and the Commission to grant exemptions from the requirements of the regulations, where the exemptions are authorized by law, will not present an undue risk to the public health or safety, and are consistent with the common defense and security. Exemptions are only granted when special circumstances are present. NMC asserts that special circumstances exist in support of this proposed exemption. The proposed and direct final rulemaking to add Amendment No. 8 to CoC No. 1004 were published on May 25, 2005. The NRC subsequently withdrew the proposed and direct final rule on July 15, 2005. The effective date of Amendment No. 8 to CoC No. 1004 is not expected until late fall of 2005. Therefore, the effective date of proposed changes that were incorporated into Amendment No. 8 to CoC No. 1004 has changed.

Summary of Commitments

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 September 20, 2005.



Paul A. Harden
Site Vice President, Palisades Nuclear Plant
Nuclear Management Company, LLC

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