

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

ENERGY NUCLEAR OPERATIONS, INC.,
ENERGY NUCLEAR PALISADES, LLC,
HOLTEC INTERNATIONAL, AND
HOLTEC DECOMMISSIONING
INTERNATIONAL, LLC

(Palisades Nuclear Plant and Big Rock
Point Site)

Docket Nos. 50-255-LT-2
50-155-LT-2
72-007-LT
72-043-LT-2

NOTIFICATION OF NRC STAFF INITIAL DISCLOSURES AND WITNESS IDENTIFICATION

The U.S. Nuclear Regulatory Commission Staff is filing this notification to inform the Atomic Safety and Licensing Board and the parties in this matter that consistent with the Board's August 31, 2022 Mandatory Disclosures Order, the Staff has identified all documents required by 10 C.F.R. §§ 2.336(b)(1)–(2), 2.1303, and 2.1316 that are relevant. The documents may be accessed on the NRC website through the Agencywide Documents Access and Management System (ADAMS) Public Documents collection at <https://www.nrc.gov/reading-rm/adams.html> by selecting "Begin Web-based ADAMS Search." The documents may also be accessed through the NRC's Electronic Hearing Docket at <https://adams.nrc.gov/ehd/>, where the documents are available under the "Staff Discovery Materials" tab in the "Initial Disclosures" sub-folder in the "Palisades - Big Rock Point LT-2 Hearing File" folder. An index containing the ADAMS accession number, date, and title or description of each identified document is attached.

Pursuant to 10 C.F.R. § 2.336(c), also attached is the affidavit of Scott P. Wall certifying that all relevant materials required by the NRC's regulations, as modified by the Board's Mandatory Disclosures Order, have been disclosed, and that the disclosures are accurate and complete as of October 14, 2022.

The Staff notes that it has made a good faith effort to identify all documents meeting the criteria of 10 C.F.R. §§ 2.336(b)(1)–(2), 2.1303, and 2.1316 that are relevant.

Finally, consistent with the Board's August 31, 2022 Scheduling and Case Management Order, the Staff has identified the sponsoring witnesses required by 10 C.F.R. § 2.1316(b) for the Staff's safety evaluation associated with the license transfer application. These sponsoring witnesses are Shawn Harwell, Financial Analyst, and Richard Turtill, Senior Financial Analyst, from the NRC's Financial Assessment Branch, Division of Rulemaking, Environmental, and Financial Support, Office of Nuclear Material Safety and Safeguards.

Respectfully submitted,

/Signed (electronically) by/

Jeremy L. Wachutka
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Dated October 14, 2022

Palisades Nuclear Plant and Big Rock Point Site LT-2
Initial Disclosures - October 14, 2022

<u>Accession Number</u>	<u>Document Date</u>	<u>Title</u>
ML20358A075	12/23/2020	Palisades Nuclear Plant and Big Rock Point Application for Order Consenting to Transfers of Control of Licenses and Approving Conforming License Amendments
ML20358A232	12/23/2020	Palisades Nuclear Plant, Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Palisades Nuclear Plant.
ML20358A239	12/23/2020	Palisades Nuclear Plant, Request for Exemptions from 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv)
ML21028A409	1/27/2021	2021/01/27 NRR E-mail Capture - Palisades Nuclear Plant - Acceptance of Holtec Exemption Request from 10CFR50.82(a)(8)(i)(A) and 10CFR50.75(h)(1)(iv) [EPID L-2020-LLE-0240]
ML21028A055	1/27/2021	2021/01/27 NRR E-mail Capture - Palisades Nuclear Plant - Acceptance of License Transfer Application (EPID No. L-2020-LLM-0003)
ML21012A035	2/1/2021	Palisades Nuclear Plant and Big Rock Point Plant - Notice of Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments and Opportunity for a Hearing (FRN)
ML21012A031	2/1/2021	Palisades Nuclear Plant and Big Rock Point Plant - Notice of Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments and Opportunity for a Hearing
ML21011A067	2/1/2021	Palisades Nuclear Plant Holtec Proposed Post-Shutdown Decommissioning Activities Report With Site-Specific Decommissioning Cost Estimate (EPID L-2020-LLM-0003)

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ML21084A811	3/25/2021	Big Rock Point Nuclear Plant, Palisades Nuclear Power Plant, Indian Point Nuclear Generating, Decommissioning Funding Status Report per 10 CFR 50.75(f)(1) and 10 CFR 50.82(a)(8)(v)
ML21281A002	10/13/2021	Palisades Nuclear Plant and Big Rock Point Plant - Request for Withholding Information from Public Disclosure (EPID L-2020-LLM-0003)
ML21302A064	10/29/2021	Palisades Nuclear Plant and Big Rock Point - Supplement to Application for Order Consenting to Transfers of Control of Licenses and Approving Conforming License Amendments
ML21309A515	11/5/2021	2021/11/05 NRR E-mail Capture - Palisades Nuclear Plant - Preparation for Issuance of final Environmental Assessment and Finding of No Significant Impact re: Holtec Exemption Request to Use DTF (EPID L-2020-LLE-0240)
ML21309A298	11/5/2021	2021/11/05 NRR E-mail Capture - Palisades Nuclear Plant and Big Rock Point Plant - Application for Order Consenting to Transfers of Licenses and Conforming License Amendments (EPID: L-2020-LLM-0003)
ML22208A105	11/16/2021	2021/11/16 NRR E-mail Capture - [External_Sender] State of Michigan Response - Palisades - Preparation for Issuance of final Environmental Assessment and Finding of No Significant Impact re: Holtec Exemption Request to Use DTF (EPID L-2020-LLE-0240)
ML21328A006	11/18/2021	2021/11/18 NRR E-mail Capture - [External_Sender] State of Michigan Response - Palisades Nuclear Plant and Big Rock Point Plant - Application for Order Consenting to Transfers of Licenses and Conforming License Amendments (EPID: L-2020-LLM-0003)
ML21285A279	11/18/2021	Palisades Nuclear Plant Environmental Assessment And Finding Of No Significant Impact Related To The Use Of The Nuclear Decommissioning Trusts For Spent Fuel Management And Site Restoration Activities (EPID L-2020-LLE-0240)

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<u>Accession Number</u>	<u>Document Date</u>	<u>Title</u>
ML21285A280	11/22/2021	Palisades DTF Exemption Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) Federal Register Notice (FRN)
ML21291A237	12/3/2021	Proposed Issuance of an Order Approving a License Transfer Application for which a Hearing has been Requested (EPID L-2020-LLM-003)
ML21292A147	12/13/2021	Draft Conforming License Amendments - Palisades Nuclear Plant Renewed Facility Operating License DPR-20 and ISFSI and Big Rock Point Facility Operating License DPR-6 and ISFSI (EPID L-2020-LLM-0003) (Enclosure 2)
ML21286A506	12/13/2021	Exemption - Palisades DTF Exemption - (EPID L-2020-LLE-0240)
ML21349A178	12/13/2021	Palisades DTF Exemption Federal Register Notice (EPID L-2020-LLE-0240)
ML21286A294	12/13/2021	Palisades Nuclear Plant - Request for Exemption from 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) for Holtec Decommissioning International, LLC (EPID L-2020-LLE-0240)
ML21292A149	12/13/2021	Palisades Nuclear Plant and Big Rock Nuclear Plant- Federal Register Notice re Order Approving Transfer of Licenses and Draft Conforming Administrative License Amendments (EPID L-2020-LLM-0003)
ML21292A145	12/13/2021	Palisades Nuclear Plant and Big Rock Point Plant - Order Approving Transfer of Licenses and Draft Conforming Administrative License Amendments (EPID L-2020-LLM-0003) (Letter)

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<u>Accession Number</u>	<u>Document Date</u>	<u>Title</u>
ML21292A146	12/13/2021	Palisades Nuclear Plant and ISFSI and Big Rock Point and ISFSI - Order Approving Direct and Indirect Transfers of Licenses and Draft Conforming Administrative License Amendments (EPID L-2020-LLM-0003) (Enclosure 1)
ML21292A148	12/13/2021	Safety Evaluation Related to Request for Direct and Indirect Transfers of Control of Facility Operating License DPR-6 for Big Rock Point and Renewed Facility Operating License DPR-20 for Palisades Nuclear Plant and ISFSI (EPID L-2020-LLM-0003) (Encl. 3)
ML22021B670	1/21/2022	Palisades Nuclear Plant and Big Rock Point - Supplement to Application for Order Consenting to Transfers of Control of Licenses and Approving Conforming License Amendments
ML22096A304	5/9/2022	Palisades Nuclear Plant and Big Rock Point Plant - New Information Regarding Order Approving Transfer of Licenses (EPIDs L-2022-LLM-0002 and L-2020-LLM-0003)
ML22173A177	6/23/2022	Enclosure 3 - Big Rock Point Amendment to Indemnity Agreement No. B-22 - Amendment No. 20
ML22173A178	6/23/2022	Enclosure 4 - Palisades Amendment to Indemnity Agreement No. B-40 - Amendment No. 13
ML22178A077	6/24/2022	Holtec Decommissioning International, LLC (HDI) Satisfactory Documentary Evidence required before the Planned Closing Date of the Purchase and Sale Transaction of Palisades Nuclear Plant and Big Rock Point Plant
ML22179A075	6/28/2022	E-mail from Entergy dated June 28, 2022, Notification of Palisades and Big Rock Point License Transfer (EPIDs L-2022-LLM-0002 and L-2020-LLM-0003)

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ML22173A175	6/28/2022	Enclosure 1 - HOLTEC Palisades, LLC and HOLTEC Decommissioning International, LLC - Big Rock Point Plant Amendment to Facility Operating License
ML22173A176	6/28/2022	Enclosure 2 - HOLTEC Palisades, LLC and HOLTEC Decommissioning International, LLC - Palisades Nuclear Plant Amendment to Renewed Facility Operating License
ML22173A173	6/28/2022	Palisades Nuclear Plant and Big Rock Point Plant - Issuance of Amendment Nos. 129 and 273 Re: Order Approving Transfer of Licenses and Conforming License Amendments (EPIDs L-2022-LLM-0002 and L-2020-LLM-0003)
ML22182A498	7/1/2022	Palisades Nuclear Plant, and Big Rock Point Plant, Indemnity Agreements

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AFFIDAVIT OF SCOTT P. WALL CONCERNING DISCLOSURE REQUIREMENTS

I, Scott P. Wall, do hereby state as follows:

1. I am employed as a Senior Project Manager in the U.S. Nuclear Regulatory Commission's Office of Nuclear Reactor Regulation. I served as a project manager for the Palisades Nuclear Plant from October 13, 2019 to July 17, 2022. Among other things, I have been assisting with the preparation of the disclosures in connection with the license transfer application at issue in this proceeding.
2. I hereby certify that all relevant materials required to be disclosed pursuant to 10 C.F.R. §§ 2.336(b)(1)–(2), 2.1303, and 2.1316, as modified by the Atomic Safety and Licensing Board's August 31, 2022 Mandatory Disclosures Order in this proceeding, have been disclosed, and that the disclosures are accurate and complete as of October 14, 2022.
3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/Executed in Accord with 10 CFR 2.304(d)/

Scott P. Wall
Senior Project Manager
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Email: Scott.Wall@nrc.gov

Dated October 14, 2022

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Certificate of Service

Pursuant to 10 C.F.R. § 2.305, I hereby certify that copies of the foregoing notification, dated October 14, 2022, have been served upon the Electronic Information Exchange (the NRC's E-Filing System), in the captioned proceeding, this 14th day of October 2022.

/Signed (electronically) by/

Jeremy L. Wachutka
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Dated October 14, 2022