



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

December 28, 2022

Mr. Mike Mlynarek
Site Vice President
Holtec Decommissioning International, LLC
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: NRC INSPECTION REPORT NO. 05000255/2022003(DRSS); 07200007/2022001
(DRSS) – HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, PALISADES
NUCLEAR PLANT

Dear Mr. Mlynarek:

On December 6, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed onsite inspection activities for June 13, 2022, through December 2022, at the permanently shut-down Palisades Nuclear Plant in Covert, Michigan. The purpose of the inspection was to determine whether decommissioning and spent fuel storage activities were conducted safely and in accordance with NRC requirements. The enclosed report presents the results of this inspection, which were discussed with you and other members of your staff on December 6, 2022.

During the inspection period, the NRC inspectors reviewed the following aspects of onsite activities: safety reviews, design changes, and modifications; problem identification and resolution; spent fuel pool safety; operations of an Independent Spent Fuel Storage Installation (ISFSI); fire protection; decommissioning performance; emergency preparedness; and radioactive waste treatment, effluent, and environmental monitoring. The inspection consisted of an examination of activities at the site as they relate to safety and compliance with the Commission's rules and regulations. Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, reviewing work activities and interviews with personnel.

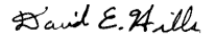
Based on the results of this inspection, the NRC did not identify any violations.

M. Mlynarek

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This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the Code of Federal Regulations (CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,



Signed by Hills, David
on 12/28/22

David E. Hills, Chief
Decommissioning, Reactor, and ISFSI HP Branch
Division of Radiological Safety and Security

Docket No: 50-255; 72-007
License No: DPR-20

Enclosure:
IR Nos. 05000255/2022003(DRSS);
07200007/2022001(DRSS)

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Letter to M. Mlynarek from D. Hills dated December 28, 2022.

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U.S. NUCLEAR REGULATORY COMMISSION
REGION III

Docket No: 50-0255; 72-007

License No: DPR-20

Report No: 05000255/2022003(DRSS);
07200007/2022001(DRSS)

Enterprise Identifier: I-2022-003-0051
I-2022-001-0112

Licensee: Holtec Decommissioning International, LLC

Facility: Palisades Nuclear Plant

Location: Covert, Michigan

Dates: June 13, 2022, to December 31, 2022

Inspectors: R. Edwards, Senior Reactor Inspector
J. Dykert, Senior Resident Inspector
M. Norris, Senior Emergency Preparedness Specialist
N. Audia, Reactor Inspector (observer)

Approved by: David E. Hills, Chief
Decommissioning, Reactor, and ISFSI HP Branch
Division of Radiological Safety and Security

Enclosure

EXECUTIVE SUMMARY

Palisades Nuclear Plant

NRC Inspection Report Nos. 05000255/2022003(DRSS); 07200007/2022001(DRSS)

The Palisades Nuclear Plant is a permanently shut-down and defueled power reactor transitioning to a Safe Storage (SAFSTOR) condition. This periodic safety inspection reviewed licensed activities associated with safety reviews, design changes and modifications; self-assessments, audits, and corrective actions; spent fuel pool (SFP) safety; operation of an Independent Spent Fuel Storage Installation (ISFSI); fire protection; decommissioning performance; emergency preparedness; and radioactive waste treatment, effluent, and environmental monitoring.

Safety Reviews, Design Changes, and Modifications

- The licensee performed adequate safety evaluations or screenings, completed design change evaluations, and properly assessed decommissioning impacts of various work activities as required by Title 10 of the Code of Federal Regulations (CFR) 50.59 and its safety review process.

Problem Identification and Resolution

- Issues were identified by the licensee at appropriate thresholds and entered into the Corrective Action Program (CAP). Issues were screened and prioritized commensurate with safety significance. Licensee evaluations determined the significance of issues and included appropriate remedial corrective actions.

Spent Fuel Pool Maintenance, Surveillance, and Safety

- The inspectors determined that the licensee safely stored spent fuel in the SFP. SFP equipment, instrumentation, alarms, leak detection, and power supplies were available and consistent with requirements.

Operation of an Independent Spent Fuel Storage Installation

- ISFSI monitoring operations were performed in accordance with the VSC-24, TN NUHOMS, and Holtec HI-STORM FW Certificate of Compliance (CoC) requirements.

Fire Protection Program

- An effective decommissioning Fire Protection Program was maintained and implemented that reasonably prevented fires; provided the capability to rapidly detect, control, and extinguish fires that could result in radiological hazards; and ensured the risk of fire-induced hazards to the public, environment, and plant personnel were minimized.

Decommissioning Performance and Status Review

- The inspectors determined that decommissioning activities were in accordance with the regulations and license requirements. Decommissioning staffing, qualifications, and training

were appropriate to the requirements and current decommissioning status. The material condition of structures, systems and components (SSCs) supported the safe storage of spent fuel and conduct of safe decommissioning.

Decommissioning Emergency Preparedness Scenario Review and Exercise Evaluation

- The inspectors determined that the licensee's exercise scenario provided sufficient opportunities to demonstrate the capability to protect public health and safety. Additionally, the licensee demonstrated adequate performance to identify weaknesses during the conduct of a critique following an emergency exercise. Identified weaknesses were entered into the CAP as appropriate.

Decommissioning Emergency Preparedness Program Evaluation

- The inspectors confirmed that changes made to the emergency preparedness program continued to meet U.S. Nuclear Regulatory Commission (NRC) requirements and licensee commitments.

Radioactive Waste Treatment, and Effluent and Environmental Monitoring

- The effluent flow paths and environmental monitoring systems reviewed aligned with descriptions in the Offsite Dose Calculation Manual (ODCM) and were functional.

Report Details

Summary of Plant Activities

During the inspection period, the licensee took actions to place the unit in SAFSTOR conditions. No major decommissioning activities occurred during the inspection period.

1.0 Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors (IP 37801)

1.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Whether the licensee's safety review process and procedures identified potential changes to Technical Specifications resulting from proposed changes, tests, experiments, or modifications;
- Whether the licensee's safety review process committee was appropriately staffed and trained in accordance with requirements;
- Whether the licensee's training program effectively trained and assessed qualified personnel for performing safety evaluations;
- Changes to design basis documentation were updated consistent with design changes;
- Design changes or modifications were effectively evaluated to maintain safety;
- Maintenance and/or work activities appropriately considered whether the activity resulted in a change or modification and were assessed in accordance with 10 CFR 50.59; and
- The effectiveness of the safety review committee meetings.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

1.2 Observations and Findings

The inspectors assessed the licensee's safety review and change control process and attended multiple meetings of the Management Review Committee, the licensee's safety review committee, in June, July and August 2022. Minimum requirements for a quorum were met, and the training qualification requirements for management performing safety evaluations and regulatory reviews were similar to the methods used while the plant was operating, and consistent with NRC requirements. The inspectors reviewed selected proposed and implemented changes throughout the inspection period. Specifically, the inspectors reviewed design changes and/or engineering calculations associated with:

- A reclassification of all plant SSCs following permanent shutdown for selected SSC's (EC 92577);
- Decommissioning fuel handling accident scenarios and calculations demonstrating doses at the exclusion area boundary remain below required limits (EC 89582);
- Isolation of the main transformer from the electrical grid (EC 92138); and
- Installation of new fencing (CCDECP-PAL-0001).

The inspectors observed operations personnel performing daily rounds at the ISFSI areas, radiologically controlled areas, the feedwater and turbine building, and of other equipment within the protected area. All SSC's that were associated with the storage, control, and maintenance of spent fuel in a safe condition were monitored for proper equipment performance.

The inspectors toured the fire water pumps' P-41, P-9B and P-9A areas on approximately a weekly basis through August 2022, and reviewed the three pump's surveillance testing results from July 10, 2022. The diesel driven fire water pumps are maintained as quality related and important to safety in support of the fire protection program and to provide water inventory to the SFP in the event of extensive water loss.

The inspectors observed the storage area and various layout pathways of FLEX equipment that can be installed as additional backup sources of power, or pumps for losses of water inventory to the SFP in the event of an extended loss of offsite power, or other abnormal event. FLEX equipment was available and ready for use at the site, the inspectors reviewed the July 8 and 9, 2022, FLEX equipment monthly check.

No findings were identified.

1.3 Conclusions

The licensee performed adequate safety evaluations or screenings, completed design change evaluations, and properly assessed decommissioning impacts of various work activities as required by 10 CFR 50.59 and its safety review process.

2.0 **Problem Identification and Resolution at Permanently Shutdown Reactors (IP 40801)**

2.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Effectiveness at preventing, detecting, and correcting issues;
- Identifying and evaluating potential 10 CFR Part 21, "Reporting of Defects and Non-Compliance Issues;"
- Audits and assessments evaluating the CAP and Quality Assurance Program; and
- The licensee's safety culture.

2.2 Observations and Findings

Throughout the inspection period, the inspectors assessed the licensee's performance as it relates to preventing, detecting, and correcting issues. This review included inspectors screening all issues entered into the licensee's CAP and attending several licensee CAP review committee meetings. The inspectors also followed an issue and troubleshooting efforts associated with ratemeter RIA-1113, the Waste Gas Discharge Process monitor. The inspectors confirmed that adequate monitoring, and that compensatory actions were established, was maintained consistent with the ODCM. Repairs were effective at returning this equipment to service. There were no issues

identified requiring reporting under 10 CFR Part 21 during this inspection period. Audits were performed consistent with a prepared schedule and in accordance with NRC requirements.

The safety culture program at Palisades was appropriate for a plant entering decommissioning. The inspectors observed personnel at all levels continue to practice focusing on a positive safety culture. The inspectors periodically met with site employees and managers to specifically discuss the safety culture on-site.

No findings were identified.

2.3 Conclusions

Issues were identified by the licensee at appropriate thresholds and entered into the CAP. Issues were screened and prioritized commensurate with safety significance. Licensee evaluations determined the significance of issues and included appropriate remedial corrective actions.

3.0 **Spent Fuel Pool Maintenance, Surveillance, and Safety at Permanently Shutdown Reactors (IP 60801)**

3.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Requirements to prevent a reduction in SFP inventory, and maintenance and surveillance activities of SFP instrumentation, alarms, leak detection, and collection systems were adequate to assure the safe storage of spent fuel;
- SFP chemistry and cleanliness controls maintained water purity standards;
- Fuel assemblies were stored consistent with nuclear criticality safety analyses and requirements;
- SFP cooling, cleanup, and power supplies were lined up consistent with the decommissioning strategy;
- Fuel movements;
- SSCs were appropriately scoped in and maintenance or condition problems were adequately addressed consistent with 10 CFR 50.65; and
- Risk was appropriately managed for proposed maintenance activities.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

3.2 Observations and Findings

The inspectors performed walkdowns at least weekly in June, July and August of the control room, SFP area, Component Cooling Water pump room, SFP Heat Exchanger room, and the Essential Service Water system area. The inspectors observed that installed redundant measurement of SFP level and area radiation monitoring was consistent with each redundant readout, were calibrated, and reflective of actual plant

conditions. The inspectors did not identify a temporary system or other pathway that could have caused an unintentional reduction in SFP water inventory.

The SFP water level was maintained greater than the minimum level specified in Technical Specification 3.7.14, and the SFP level indicators were maintained as required. SFP chemistry and cleanliness trends for May – July 2022, and records of boron concentration testing in June and July 2022 were reviewed, boron concentration was kept greater than the concentration required by Technical Specification 3.7.15.

The inspectors reviewed the licensee’s technical specification surveillance procedure, DWO-3, Rev. 0, “Operator’s Daily/Weekly Items Permanently Defueled.” The operators monitored on a daily basis the plant’s radiation monitors including the SFP area radiation monitors, the SFP water level, the spent fuel storage area conditions and cask temperatures, and the fire pump batteries on a weekly basis. The changes to the plant’s configuration following permanent shutdown were appropriately scoped and SSCs were effectively monitored and assessed.

The licensee maintained a program consistent with 10 CFR 50.65, to monitor the effectiveness of systems that are associated with the storage, control, and maintenance of spent fuel. During this inspection period, the inspectors reviewed the scoping documents and if any, maintenance records associated with the following systems:

Critical Service Water System
SFP Cooling System
Fire protection System

The inspectors concluded that risk was appropriately considered when planning maintenance activities.

No findings were identified.

3.3 Conclusions

The inspectors determined that the licensee safely stored spent fuel in the SFP. SFP equipment, instrumentation, alarms, leak detection, and power supplies were available and consistent with requirements.

4.0 **Operation of an Independent Spent Fuel Storage Installation (IP 60855)**

4.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee’s performance in the following areas:

- Changes, tests, or experiments were made in accordance with 10 CFR 50.59 and 10 CFR 72.48 and evaluations required by 10 CFR 72.212 were revised; as applicable;
- ISFSI monitoring activities were performed in accordance with approved procedures; and
- The effectiveness of the licensee’s quality assurance program.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

4.2 Observations and Findings

The inspectors observed that the licensee was evaluating changes to the facility, programs, and procedures since the last inspection in accordance with 10 CFR 50.59, 10 CFR 72.48, and 10 CFR 72.212. Changes were consistent with the license and CoCs, and did not reduce the effectiveness of the applicable programs.

The licensee performed routine surveys and environmental radiological monitoring as required for the ISFSI. The survey results indicated that radiological conditions were in accordance with the 10 CFR 72.104 limits.

The inspectors conducted a walkdown of the ISFSI pad on October 20, 2022. The inspectors evaluated the structural condition of the pads, storage casks, and storage modules for the VSC-24, TN NUHOMS, and Holtec HI-STORM FW systems in service. Additionally, the inspectors performed independent radiological surveys to verify the licensee's survey results.

A review of audits and corrective action reports written since the last ISFSI inspection indicated that the licensee was identifying and correcting conditions adverse to quality.

No findings were identified.

4.3 Conclusions

ISFSI monitoring operations were performed in accordance with the VSC-24, TN NUHOMS, and Holtec HI-STORM FW CoC requirements.

5.0 Fire Protection Program at Permanently Shutdown Reactors (IP 64704)

5.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Fire protection program met Technical Specifications, Post Shutdown Decommissioning Activities Report (PSDAR), and fire hazard analyses requirements;
- Changes to the Fire Protection Program did not reduce the effectiveness of the program;
- Assessments were being performed in accordance with 10 CFR 50.48(f)(2);
- Fire protection detection and suppression systems were effectively maintained, surveillances were performed, and systems were capable of performing their intended function;
- Fire barriers were effectively maintained;
- Firefighting equipment was properly inventoried, inspected, tested, and maintained;
- Administrative controls were in place to minimize the occurrence of a fire; and
- Staffing and training requirements were consistent with the Fire Protection Program and Emergency Plan.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

5.2 Observations and Findings

Fire protection walkdowns were completed by the inspectors approximately every week from mid-June through August 2022, in the following areas:

- SFP area and refuel floor;
- SFP heat exchanger and pump room;
- CCW pump room; and
- Service water and diesel fire pump areas.

These walkdowns verified that any fire hazards present were as described in the licensee's fire protection program. The inspectors confirmed during walkdowns that the fire extinguishers, hose reels, and automatic fire suppression systems were available, maintained, and located as indicated in the approved pre-fire plans.

Records of fire protection system surveillance tests, walkdowns, valve alignments, and program reviews performed and documented by the licensee were reviewed by the inspectors, such as:

- Transformer deluge system test on July 1, 2022;
- Fire suppression system valve alignment on June 29, 2022;
- Fire water pumps P-41, P-9B and P-9A surveillance testing on July 10, 2022;
- Monthly fire protection tour in July of radwaste buildings on July 13, 2022; and
- Review of operations June 2022 fire protection equipment and rounds checks.

The inspectors reviewed the licensee's fire brigade staffing and training, these remained consistent with applicable regulatory requirements.

No findings were identified.

5.3 Conclusions

An effective decommissioning Fire Protection Program was maintained and implemented that reasonably prevented fires; provided the capability to rapidly detect, control, and extinguish fires that could result in radiological hazards; and ensured the risk of fire-induced hazards to the public, environment, and plant personnel were minimized.

6.0 Decommissioning Performance and Status Review (IP 71801)

6.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Whether maintenance was conducted at an appropriate frequency;

- Updates to the Updated Final Safety Analysis Report (UFSAR) and Decommissioning Safety Analysis Report (DSAR) were made consistent with 10 CFR 50.71;
- Site characterization was consistent with the strategy outlined in the PSDAR;
- Records important to decommissioning were kept consistent with 10 CFR 50.75(g);
- Commitments and requirements in the Technical Specifications, PSDAR, ODCM, or Emergency Plan were effective and being met;
- Appropriate administrative and/or engineering controls were identified and implemented in work plans; and
- Organization and staffing were appropriately adjusted for changes in the status of decommissioning.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

6.2 Observations and Findings

The Palisades Nuclear Plant UFSAR, Revision 35, was replaced by the DSAR, Revision 36, on July 19, 2022, and was consistent with the requirements in 10 CFR 50.71(e).

Maintenance on equipment related to the safe storage of spent fuel, fire protection, and radiological monitoring was performed at specified frequencies as documented in respective sections of this report. Records important to decommissioning of spills or other unusual occurrences involving contamination were being maintained to satisfy 10 CFR 50.75(g) under the licensee's procedure EN-RP-113 "Response to Contaminated Spills/Leaks."

The inspectors attended numerous daily status briefings from June through August 2022, and remotely received periodic updates from site management on a biweekly frequency. Plant tours and walkdowns of areas where work plans were being implemented, such as a security fence modification, the east radwaste building, and the feedwater purity building, occurred when those work activities were ongoing. Applicable procedures were followed, established engineering controls remained in place, and the licensee implemented work plans adequately as directly observed by the inspectors.

As the facility continued to transition to a SAFSTOR condition, the licensee adjusted staffing levels consistent with the needs of the facility and regulatory requirements. The inspectors found the staffing and qualifications appropriate to the current condition.

There were no changes to the schedule or costs associated with decommissioning identified during this inspection period.

No findings were identified.

6.3 Conclusions

The inspectors determined that decommissioning activities were in accordance with the regulations and license requirements. Decommissioning staffing, qualifications, and training were appropriate to the requirements and current decommissioning status. The

material condition of SSCs supported the safe storage of spent fuel and conduct of safe decommissioning.

7.0 Decommissioning Emergency Preparedness Scenario Review and Exercise Evaluation (IP 82401)

7.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Whether the exercise scenario provided sufficient opportunities to demonstrate the licensee's capability to perform key skills in principle functional areas to protect public health and safety; and
- The adequacy of the licensee's conduct of an exercise and ability to assess performance via a formal critique to identify and correct weaknesses.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

7.2 Observations and Findings

The inspectors reviewed and determined that the exercise scenario provided sufficient opportunities to demonstrate key skills in principle functional areas to protect public health and safety. Additionally, through direct observation of the emergency response organization during an emergency exercise performed on September 21, 2022, the inspectors confirmed the scenario provided sufficient opportunities to demonstrate the licensee's capability. Specifically, the inspectors observed the conduct of the exercise from the Control Room, Technical Support Center, Operations Support center, and Emergency Operations Facility (EOF). The licensee staff in each response facility were tested and evaluated regarding their proficiency in emergency response. Inspectors observed the assessment of simulated plant indications and the control of the exercise to ensure the exercise participants were required to independently assess the scenario and classify it appropriately. The scenario did not include an escalation in events that would require Protective Action Recommendations. Calculations of offsite dose assessments were observed in the EOF and correctly used inputs from simulated plant values. The dose assessment results were promptly communicated to the EOF Emergency Director who correctly interpreted the results and simulated entry into the correct Emergency Action Level. Following the exercise, the inspectors observed portions of the licensee's critique and concluded that the licensee adequately assessed performance and entered identified weaknesses into the CAP as appropriate.

Corrective actions from the last biennial exercise were also reviewed, and the inspectors did not note any repeat issues from the last exercise during the most recent emergency preparedness exercise.

No findings were identified.

7.3 Conclusions

The inspectors determined that the licensee's exercise scenario provided sufficient opportunities to demonstrate the capability to protect public health and safety. Additionally, the licensee demonstrated adequate performance to identify weaknesses during the conduct of a critique following an emergency exercise. Identified weaknesses were entered into the CAP as appropriate.

8.0 **Decommissioning Emergency Preparedness Program Evaluation (IP82501)**

8.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Whether the licensee maintained emergency preparedness requirements;
- Staffing of the Emergency Response Organization; and
- Emergency Action Level and Emergency Plan changes.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

8.2 Observations and Findings

Palisades implemented the Post-Shutdown Emergency Plan on June 15, 2022. This plan was previously approved by the NRC on September 24, 2018 (ML18170A219), and became effective following the permanent cessation of power operations and permanent removal of fuel from the reactor vessel at Palisades (ML22164A067). The inspectors confirmed the implementation of the approved plan during an on-site inspection the week of September 19, 2022. The emergency response organization and changes implemented by the licensee were consistent with the approved Emergency Plan.

No findings were identified.

8.3 Conclusions

The inspectors confirmed that changes made to the emergency preparedness program continued to meet NRC requirements and licensee commitments.

9.0 **Radioactive Waste Treatment, and Effluent and Environmental Monitoring (IP 84750)**

9.1 Inspection Scope

The inspectors performed walkdowns, reviewed documents, and interviewed plant personnel to assess the licensee's performance in the following areas:

- Effluent monitoring ventilation and discharge system configurations, flow paths, and operations were consistent with the licensing basis and procedures; and
- Effluent monitors were calibrated.

The inspectors verified that when issues were identified, licensee personnel appropriately documented the issue in the CAP.

9.2 Observations and Findings

The inspectors reviewed the July 7, 2022, monthly radiation process monitors' functional testing, the July 8, 2022, service water sampling analysis and effluent calculations, and the June 27, 2022, stack effluent sampling analysis and effluent calculations. Effluent monitors were calibrated and consistent with the licensee's procedures and ODCM.

No findings were identified.

9.3 Conclusions

The effluent flow paths and environmental monitoring systems reviewed aligned with descriptions in the ODCMI and were functional.

10.0 **Exit Meeting**

The inspectors presented the results of the inspection to Mr. M. Mlynarek and other members of the Palisades staff at an exit meeting on December 6, 2022. The licensee acknowledged the results presented and did not identify any of the information discussed as proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

M. Mlynarek, Site Vice President
N. DeMaster, Decommissioning Director
M. Schultheis, Licensing Manager
M. Bailey, Operations Director
G. Wright, Radiation Protection Manager
J. Miksa, Senior Staff Licensing Engineer

INSPECTION PROCEDURES (IPs) USED

IP 37801 Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors
IP 40801 Problem Identification and Resolution at Permanently Shutdown Reactors
IP 60801 Spent Fuel Pool Safety at Permanently Shutdown Reactors
IP 60855 Operation of an Independent Spent Fuel Storage Installation
IP 64704 Fire Protection Program at Permanently Shutdown Reactors
IP 71801 Decommissioning Performance and Status Reviews at Permanently Shutdown Plants
IP 82401 Decommissioning Emergency Preparedness Scenario Review and Exercise Evaluation
IP 82501 Decommissioning Emergency Preparedness Program Evaluation
IP 84750 Radioactive Waste Treatment, and Effluent and Environmental Monitoring

ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Opened</u>	<u>Type</u>	<u>Summary</u>
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None

<u>Closed</u>	<u>Type</u>	<u>Summary</u>
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None

PARTIAL LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

- TE-PAL-0002; Acceptability of Increasing the Service Water Basket Strainers Differential Pressure Alarm Setpoints to 10 psid, Rev. 0
- EC 92577; Safety Classification of all Plant Structures, Systems, and Components, Rev. 0
- EC 89582; Decommissioning Fuel Handling Accident Scenario Calculations; Rev 0

- EC 92138; Isolation of the Main Transformer from the Electrical Grid; Rev. 0
- CCDECP-PAL-0001; Installation of South Yard Security Fencing; 8/2/2022
- NAI-1149-026; Palisades Design Basis Cask Drop Accident AST Radiological Analysis; Rev. 0
- NAI-1149-016; Palisades Design Basis Fuel Handling Accident AST Radiological Analysis; Rev. 1
- Palisades Maintenance Rule Scoping Document; Rev. 5
- DSP-EN-002; Implementation of the Maintenance Rule at a Decommissioning Facility, Rev. 0
- DSP-EN-001; Conduct of Design Engineering; Rev. 1
- EI-17; Compensating Measures for OOS EAL Equipment; Rev. 11
- PSEP; Post-Shutdown Emergency Plan; Rev. 34
- DWC-11D; Safeguards Boron Sample from Spent Fuel Pool; Rev. 18
- DWO-3; Operator's Daily/Weekly Items Permanently Defueled; Rev. 0
- DWR-10; Stack Effluent Sampling and Calculations; Rev. 67
- MO-7B; Fire Water Pumps P-9A, P-9B, and P-41; Rev. 44
- MR-14; Process Monitor Function Checks – Monthly; Rev 79
- PNP 2015-084; Notification of Full Compliance with NRC Order EA-12-051, "Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"; 12/16/2015
- PNP 2013-009; Palisades Nuclear Plant Integrated Plan for Reliable Spent Fuel Pool Instrumentation and Enclosure; 2/28/2013
- CR-PLP-2022-01059; NUHOMS Temperature Monitoring Computer Malfunction; 6/18/2022
- IR PAL-00015; Tritium in Electrical Man-Hole; 7/13/2022
- IR PAL-00644; Door to EDG Room Auto Closer Broke; 7/26/2022
- IR PAL-00036; Engineering Change to Update Fire Protection Documents; 7/27/2022
- IR PAL-00699; Waste Gas Discharge Process Monitor Failure; 8/5/2022
- IR PAL-00664; DC Bus #1 Ground Indication; 8/2/2022
- IR PAL-00720; SX-5211 Sampler Leaking 1 Drop per Second; 8/16/2022
- WO52998847 and 52998143; Stack Effluent Sampling Calculations; 6/22/2022 and 6/30/2022
- WO52997473; Safeguards Boron Sample from Spent Fuel Pool; 6/22/2022 and 7/6/2022
- WO53007662; Service Water Collection and Calculation; 7/8/2022
- WO53007416; Process Monitor Checks – Monthly; 7/7/2022
- WO53006806; Operations Monthly Fire Protection Checks; 7/11/2022
- WO53008239; Monthly Fire Protection Tour; 7/13/2022
- WO52977652; Annual FLEX Hose Inspection FSB-B; 7/8/2022
- WO53008180; FLEX Storage Building 'B' Monthly Stand-By Checks; 7/9/2022
- WO53008224; FLEX Storage Building 'A' Monthly Stand-By Checks; 7/8/2022
- WO52999473; Fire Water Pumps P-9A, P-9B, and P-41 Surveillance Test; 7/10/2022
- WO53004212; Fire Suppression Water System Valve Alignment; 6/29/2022
- WO52952251; Transformer Deluge Systems Surveillance Test; 7/1/2022
- WO888000-03-16-2228 & 2227 & 2226 & 2225; Operator's Daily/Weekly Items; 6/26-7/20/22
- Report No. PLP-721032; Palisades 10 CFR 72.212 Evaluation Report for the Holtec International HI-STORM FW Storage System; 12/8/2020
- Report No. PLP-721004; Palisades 10 CFR 72.212 and Certificate of Compliance Evaluation Report for the Standardized NUHOMS 32PT and 24PTH Systems; 12/8/2020
- Report No. VSC-24 10 CFR72.212-PLP; Palisades 10 CFR 72.212 Evaluation Report for the Energy Solutions Ventilated Storage Cask 24; 12/8/2020
- WO 52976301; AT-36 ISFSI Pad Monitoring System; 5/17/2022
- WO 52976301; AT-9 Dry Fuel Storage Cask Exterior Inspection; 5/17/2022
- QA-20-2020-PLP-1; Independent Spent Fuel Storage Installations (ISFSI); 9/8/2020
- Survey No. 2022-0037; ISFSI East; 8/8/2022
- Survey No. 2022-0022; ISFSI North; 7/14/2022

- Survey No. PLP-2201-00025; Routine Quarterly Survey; 1/22/2022
- Survey No. PLP-2202-00003; Quarterly Status Sheet; 2/1/2022
- Survey No. PLP-2102-00036; Quarterly Survey of the North ISFSI Pad; 1/14/2021
- Survey No. PLP-2101-00037; Quarterly Survey of the East ISFSI Pad; 1/14/2021
- DWO-3; VSC, NUHOMS, and Holtec Casks Thermal Performance; 10/20/2022
- QA-7-2021-PLP-1; Emergency Preparedness Audit; 5/11/2021
- Post Shutdown Emergency Plan; Revision 34
- 2022 Palisades Nuclear Plant Emergency Exercise Scenario; 7/12/2022
- WO 52964104; Public Warning System Repeater; 11/29/2021
- WO 52983051; Public Warning System Inspection; 12/6/2021
- WO 52868757; Public Warning System Repeater; 1/24/2020
- WO 52910405; Public Warning System Inspection; 3/19/2020
- WO 52973954; Public Warning System Inspection; 10/18/2021
- WO 52991101; Public Warning System Inspection; 4/26/2022
- WO 52899887; Public Warning System Inspection; 1/24/2020
- WO 52923355; Public Warning System Inspection; 5/14/2020
- Palisades NRC Evaluated Extensive Damage Mitigation Tabletop Drill Report; 10/28/2020
- Palisades NRC Graded Exercise Report; 10/27/2020

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access and Management System
CAP	Corrective Action Program
CFR	Code of Federal Regulations
CoC	Certificate of Compliance
DSAR	Decommissioning Safety Analysis Report
DRSS	Division of Radiological Safety and Security
EOF	Emergency Operations Facility
EP	Emergency Preparedness
IP	Inspection Procedure
IR	Inspection Report
ISFSI	Independent Spent Fuel Storage Installation
NRC	U.S. Nuclear Regulatory Commission
ODCM	Offsite Dose Calculation Manual
PSDAR	Post Shutdown Activities Report
SAFSTOR	Safe Storage
SFP	Spent Fuel Pool
SSC	Structures, Systems, or Component
UFSAR	Updated Final Safety Analysis Report