



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

REQUEST FOR ADDITIONAL INFORMATION

RELATED TO THE POST-SHUTDOWN DECOMMISSIONING ACTIVITIES REPORT

HOLTEC DECOMMISSIONING INTERNATIONAL, LLC

PALISADES NUCLEAR PLANT

DOCKET NO. 50-255

On December 23, 2020, Holtec Decommissioning International, LLC (HDI) submitted to the U.S. Nuclear Regulatory Commission (NRC) a letter enclosing the Post-Shutdown Decommissioning Activities Report (PSDAR) and the Site-Specific Decommissioning Cost Estimate (DCE) for the Palisades Nuclear Plant (Palisades), contingent upon the transfer of the Palisades operating licenses to HDI. The PSDAR and DCE have been made publicly available in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML20358A232. The Palisades license transfer transaction closed on June 28, 2022 (ML22179A075), allowing the NRC staff to begin the review of the HDI PSDAR for Palisades.

Paragraph 50.82(a)(4)(i) of title 10 of the *Code of Federal Regulations* (10 CFR) states that a PSDAR must contain a description of the planned decommissioning activities along with a schedule for their accomplishment, a discussion that provides the reasons for concluding that the environmental impacts associated with site-specific decommissioning activities will be bounded by appropriate previously issued environmental impact statements, and a site-specific DCE, including the projected cost of managing irradiated fuel. In addition, the regulation at 10 CFR 50.82(a)(6) states, in part, that "[l]icensees shall not perform any decommissioning activities ... that ... [r]esult in significant environmental impacts not previously reviewed"

In NUREG-0586, "Generic Environmental Impact Statement [GEIS] on Decommissioning of Nuclear Facilities: Supplement 1, Regarding the Decommissioning of Nuclear Power Reactors," the NRC evaluated the environmental impacts during the decommissioning of nuclear power reactors. The decommissioning GEIS concludes that:

For those issues that have been determined to be generic, licensees may proceed with the decommissioning activity without further analysis provided that the impacts resulting from those activities fall within the range of impacts as described in Chapter 4. However, if the impacts of an activity fall outside the range predicted in Chapter 4, or if the activity results in impacts to environmental issues not considered in this Supplement, or if the impact involves an environmental issue determined to be conditionally site-specific as defined above, then the activity cannot be performed until a further site-specific analysis is completed along with a license-amendment request and NRC has approved

the license amendment (the license amendment request will provide an opportunity for a public hearing).

The following is a request for additional information (RAI) to facilitate the ongoing review of the Palisades PSDAR being conducted by the NRC staff. A timely and accurate response to this RAI is requested in order to continue the staff's review of the Palisades PSDAR.

RAI 1

The decommissioning GEIS evaluates the environmental impacts from three decommissioning methods or a combination of these methods: DECON, SAFSTOR, and ENTOMB. The decommissioning GEIS states that the selection of a decommissioning method(s) is left entirely to the licensee and is communicated to the NRC and the public in the PSDAR.

However, the Palisades PSDAR does not explicitly identify the decommissioning method, or combination of methods, that will be used at the facility. Please identify the decommissioning method or a combination of methods that will be used for the decommissioning of Palisades.

RAI 2

Section 5.3 of the Palisades PSDAR states that for radiation dose, waste management, air quality, water quality, ecological resources, and socioeconomics, "[t]he NRC staff did not identify any new and significant information during their independent review of the Palisades license renewal environmental report at that time, the site audit, or the scoping process for license renewal...the NRC concluded that there are no impacts related to these issues beyond those discussed in the SEIS ([PSDAR] Reference 9), or the GEIS ([PSDAR] Reference 2) for decommissioning.... The NRC found no site-specific issues related to decommissioning and there are no decommissioning activities contemplated for Palisades that would alter that conclusion." Section 5.5 of the Palisades PSDAR further states that based on the discussions presented in the Palisades PSDAR, including Section 5.3, HDI concludes that the environmental impacts associated with planned Palisades site-specific decommissioning activities will be bounded by the appropriate, previously issued environmental impact statements.

However, NUREG-1437, Supplement 27, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants: Regarding Palisades Nuclear Plant - Final Report," did not reach conclusions related to Category 1 decommissioning issues with respect to the 2002 decommissioning GEIS (NUREG-0586, Supplement 1), but rather with respect to the 1996 license renewal GEIS (see Section 7.1 of NUREG-1437, Supplement 27).

Given that NUREG-1437, Supplement 27 reached conclusions related to applicable Category 1 decommissioning issues for Palisades with respect to the 1996 license renewal GEIS (i.e., the impacts associated with decommissioning following the license renewal term), rather than the decommissioning GEIS, please provide a basis for concluding that the environmental impacts associated with site-specific decommissioning activities for Palisades will be bounded by appropriate previously issued environmental impact statements for radiation doses, waste management, air quality, water quality, ecological resources, and socioeconomic impacts.