



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

June 22, 2023

LICENSEE: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC

FACILITIES: PALISADES NUCLEAR PLANT

SUBJECT: SUMMARY OF MAY 24, 2023, MEETING WITH HOLTEC DECOMMISSIONING INTERNATIONAL, LLC REGARDING REGULATORY PATH FOR POTENTIALLY REQUESTING REAUTHORIZATION OF POWER OPERATIONS AT PALISADES NUCLEAR PLANT

On May 24, 2023, an Observation meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Holtec Decommissioning International, LLC (the licensee) at 11555 Rockville Pike, Rockville, MD. The purpose of the meeting was for the licensee to discuss with the NRC staff their regulatory path to potentially request reauthorization of power operation at the Palisades Nuclear Plant, based on its March 13, 2023, letter. This was a follow-up meeting from a meeting held on March 20, 2023. This meeting focused more on the planned exemption and licensing amendments mentioned in the letter. The meeting notice and agenda, dated May 11, 2023, is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML23139A248. A list of attendees is provided as an Enclosure.

The licensee's slide presentation is available in ADAMS at Accession No. ML23139A192. The licensee's March 13, 2023, letter is available in ADAMS at Accession No. ML23072A404. The licensee began the presentation with an overview of their plan to potentially request reauthorization of power operations at Palisades. The licensee talked about the milestones that need to happen in order for Holtec to be able to make a decision on whether to move forward with the project: 1) Holtec needs to secure a loan from the Department of Energy, 2) legislation in the State of Michigan needs to be passed, and 3) a power purchase agreement needs to be reached. Holtec stated that they were hopeful these three items would be completed by October of 2023. If Holtec makes the decision to move forward with the project, they stated they would formally notify the NRC via a letter required by 10 CFR 50.82(a)(7) for major changes to the decommissioning schedule.

The licensee then talked about their planned submittals. The licensee stated that the plan would be to submit a request for an exemption to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.82(a)(2) which states that the license no longer authorizes operation of the reactor or retention of fuel in the reactor vessel. Included in the exemption request, the licensee stated they would ask for rescission of orders issued to support decommissioning efforts. The NRC staff stated that, if included with the exemption request, the rescission requests would be handled separately. Following the exemption request, the licensee stated that a series of license amendment requests would be submitted to restore the Palisades operating licensing basis to that which existed just prior to the plant shutting down. One of the

amendments would be to upgrade the emergency plan to follow the guidance in NEI 99-01 Revision 6. The NRC staff recommended looking into also upgrading to the guidance in NUREG-0654, Revision 2. The NRC staff also asked the reason behind having two license amendment requests to restore the technical specifications instead of just one. The licensee stated that since two license amendment requests were used during the transition to decommissioning, they were using the same logic for restart. The licensee stated they would re-evaluate if two amendments provided any benefit.

The licensee mentioned revising other regulatory programs to support power operation, such as the quality assurance program. The NRC staff asked whether the licensee planned to submit the revised quality assurance program for NRC review and approval. Holtec stated they were not planning on requesting NRC approval for the changes but would be making the changes and submitting in accordance with 10 CFR 50.54(a)(3).

The licensee's last topic was the environmental review. The licensee stated that they believed the exemption and amendments would meet the criteria for categorical exclusion in accordance with 10 CFR 51.22. The NRC staff stated it would evaluate the licensee's justification should the applications be submitted. The NRC staff recommended having further engagement with the licensee on this topic through more pre-application meetings. In addition, the NRC staff recommended, should Holtec make the decision to move forward with the project, to have pre-application meetings on each proposed licensing action. The licensee agreed and stated that, should they make the decision to move forward, they would request pre-application meetings within a few weeks with a plan to have all requests to the NRC within 6 months.

Members of the public were in attendance and some of them had comments for the NRC staff. There were some comments in favor of the licensee moving forward with the project for reasons related to providing local jobs, tax revenue, and a clean energy source. Others were against the licensee moving forward with the project for reasons such as it being too risky and too old. Also there were questions regarding the use of the previous licensing basis, loss of experienced staff, potential loss of records from transition from Entergy to Holtec, and reactor vessel head integrity.

No Public Meeting Feedback Forms were received.

Please direct any inquiries to me at 301-415-2048, or via email at Justin.Poole@nrc.gov.

/RA/

Justin C. Poole, Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES
MAY 24, 2023, MEETING WITH HOLTEC DECOMMISSIONING INTERNATIONAL LLC
REGULATORY PATH TO POTENTIALLY REQUESTING REAUTHORIZATION OF POWER
OPERATIONS AT PALISADES

NRC Participants:

- Bo Pham, Director, Office of Nuclear Reactor Regulation (NRR)/Division of Operating Reactor Licensing (DORL)
- Justin Poole, Project Manager, NRR/DORL/LPL1
- Ngola Otto, Project Manager, NRR/DORL/Licensing Projects Branch
- James Danna, Project Manager, NRR/DORL/LPL 2-2
- Tanya Hood, Project Manager, Office of Nuclear Material Safety and Safeguards (NMSS)/Division of Decommissioning, Uranium Recovery, and Waste Programs (DUWP)/Reactor Decommissioning Branch (RDB)
- Marlayna Doell, Project Manager, NMSS/DUWP/RDB
- Russell Felts, Director, NRR/Division of Reactor Oversight (DRO)
- Tania Martinez Navedo, Deputy Director, NRR/DRO
- John Moses, Deputy Director, NMSS/Division of Rulemaking, Environmental, and Financial Support (REFS)
- Ken Erwin, Branch Chief, NMSS/REFS/Environmental Review New Reactors Branch (ENRB)
- Lauren Willingham, Environmental Project Manager, NMSS/REFS/ENRB
- Ted Smith, Branch Chief, NMSS/REFS/Environmental Review License Renewal Branch (ELRB)
- Lance Rakovan, Senior Environmental Project Manager, NMSS/REFS/ELRB
- Jason Kozal, Deputy Division Director, Division of Operating Reactor Safety
- David Hills, Branch Chief, RIII/Division of Radiological Safety and Security/Decommissioning Reactor ISFSI Health Physics Branch
- Todd Keene, Technical Assistant, Office of the Executive Director for Operations
- Jeremy Wachutka, Office of General Counsel
- Joe Gillespie, Legal Assistant, Office of Commissioner Wright
- Scott Burnell, Public Affairs Officer
- Dave McIntyre, Public Affairs Officer
- Prema Chandrathil, Public Affairs Officer
- Carolyn Wolf, Congressional Affairs Officer
- John Lamb, Project Manager, NRR/DORL/LPL2-1
- Daniel King, Project Manager, NRR/DORL/LLPB
- Jeff Bream, Senior Security Risk Analyst, Office of Nuclear Security and Incident Response (NSIR)/ Division of Security Operations (DSO)/Security Oversight and Support Branch (SOSB)
- Niry Simonian, Security Specialist, NSIR/DSO/SOSB
- Mike Norris, Senior Emergency Preparedness Specialist, NSIR/Division of Preparedness and Response/Reactor Licensing Branch
- Katie Wagner, Project Manager, NRR/Division of Advanced Reactors and Non-Power Production and Utilization Facilities/Advanced Reactor Policy Branch
- Meredith Neubauer, Senior Civil Rights Specialist, Office of Small Business and Civil Rights/
- Mary Casto, General Scientist
- Robert Schaaf, Advisor, Pacific Northwest National Laboratories

Enclosure

Holtec Decommissioning International, LLC:

- Jean Fleming, Vice President of Licensing, Regulatory Affairs and PSA
- Michael Schultheis, Manager, Regulatory Affairs Palisades
- James Miksa
- Justin Hawkins
- Brenda Gales
- Nicholas Culp
- Aaron McVay
- Evrim Kalfazade
- Michael Bailey
- Jeff Borah
- Kevin Block
- Michael Mlynarek
- Paul Rhodes
- Scott Summers
- Shona Sorenson-Brower
- Thomas Swiecicki
- Troy Geauthreaux

Public:

- Tom Pollog, Department of Energy
- Chin Cheung, Department of Energy
- Alvin Leong, Department of Energy
- Todd Stribley, Department of Energy
- Lichao Du, Department of Energy
- Terrence Hulihan, Department of Energy
- Alicia Williamson, Department of Energy
- Matthew Gee, Department of Energy
- Jon Okafor, Department of Energy
- Colleen Coffey, Department of Energy
- Ryan Fuld, Department of Energy
- Stacy Ford, Department of Energy
- Paul Gunter, Reactor Oversight, Beyond Nuclear
- Daisuke Nio
- Brandon Hinz
- Griffin Graham
- Jacqueline Hampton
- Lewis Csedrik
- Brad Jones
- David Skutt
- Craig Stewart
- Greg Gothard, EGLE
- Geoffrey Rose
- Darryl Williams
- Rockey Adams
- George Sleeper
- Terry Lodge
- Michael McQueen
- Jana Bergman
- Donovan Thomas, EGLE
- Kraig Schultz
- ABC57
- Audrey Brown
- Mike Chappell
- Rachel Metzger, EGLE
- Kathy Wagaman, South Haven Chamber
- Michael Keegan
- Jeffrey D. Quinn
- Kevin Kamps, Beyond Nuclear & Don't Waste Michigan
- Ross
- Richard Godfrey
- Tina Leary
- David Asselin, EGLE
- Bill Lin
- Juliana Knot
- Justin Palthe
- Leslie Smith III, EGLE
- Yolanda Brunt
- Carlyn Greene
- Theodore R. Wentworth, EGLE
- John
- Dan Leone
- Jennifer Kanine, PhD, CWB
- Jim Storey
- 170XXXXXX89
- 126XXXXXX00
- 126XXXXXX18
- 160XXXXXX65

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ADAMS Accession Nos.:

Package: ML23171B124

Meeting Slides: ML23139A192

Meeting Notice: ML23139A248

Meeting Summary: ML23171B122

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM
NAME	JPoole	KZeletznock	HGonzález	JPoole
DATE	06/20/2023	06/21/2023	06/21/2023	06/22/2023

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