

From: [Marlayna Doell](#)
To: [James Miksa](#)
Cc: [Amy Filbrandt](#)
Subject: DRAFT Request for Additional Information: Palisades Administrative TS License Amendment Request
Date: Friday, June 28, 2024 2:35:00 PM
Attachments: [DRAFT REQUEST FOR ADDITIONAL INFORMATION - Palisades Administrative TS License Amendment Request.docx](#)
Importance: High

Dear Jim,

By letter dated February 9, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24040A089), Holtec Decommissioning International, LLC (HDI), on behalf of Holtec Palisades, LLC, requested changes to Renewed Facility Operating License (RFOL) No. DPR-20 for the Palisades Nuclear Plant (PNP). Specifically, HDI requested U.S. Nuclear Regulatory Commission (NRC) approval of a license amendment request (LAR) to revise selected sections of the Permanently Defueled Technical Specifications (PDTs) to reflect the proposed resumption of power operations at PNP.

The NRC staff has determined that additional information is needed to support its review. The attached is the NRC staff's draft request for additional information (RAI). If HDI would like clarification on the attached draft RAI, the below dates and times are available for the NRC's technical staff:

Tuesday, July 2: 11:00 – 11:45 AM EST or 2:00 – 2:45 PM EST
Wednesday, July 3: 11:00 – 11:45 AM EST or 12:45 – 1:30 PM EST
Monday, July 8: 1:00 – 1:45 PM EST or 1:45 – 2:30 PM EST
Tuesday, July 2: 11:00 – 11:45 AM EST or 1:00 – 1:45 PM EST

Please contact me to schedule a clarification discussion if any of these correspond to the availability of your staff. If no clarification is required, then the attached draft RAI will be considered a final RAI and the NRC staff will expect a response 30 days from this message. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-3175 or marlayna.doell@nrc.gov. Thank you and I hope you have a great weekend!

Cheers,
Marlayna

[Marlayna Vaaler Doell](#)

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Decommissioning Project Manager  
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DRAFT REQUEST FOR ADDITIONAL INFORMATION  
REGARDING LICENSE AMENDMENT REQUEST FOR  
THE ADMINISTRATIVE TECHNICAL SPECIFICATIONS  
HOLTEC DECOMMISSIONING INTERNATIONAL, LLC  
PALISADES NUCLEAR PLANT  
DOCKET NO. 50-255

INTRODUCTION

By application dated February 9, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24040A089), Holtec Decommissioning International, LLC (HDI), on behalf of Holtec Palisades, LLC, requested changes to Renewed Facility Operating License (RFOL) No. DPR-20 for the Palisades Nuclear Plant (PNP). Specifically, HDI requested U.S. Nuclear Regulatory Commission (NRC, the Commission) approval of a license amendment request (LAR) to revise selected sections of the Permanently Defueled Technical Specifications (PDTs) to reflect the proposed resumption of power operations at PNP.

The LAR proposes changes to selected sections of the technical specifications (TS) listed in paragraph (c)(5) of section 50.36, "Technical specifications," of Title 10 of the *Code of Federal Regulations* (10 CFR) related to administrative controls (Sections 1.0 and 5.0 of the PNP TS). In the LAR, HDI states that the proposed changes are consistent with the previously approved PNP power operations technical specifications, which were in effect just prior to permanent shutdown and defueling of the plant in May 2022.

To complete its review of the proposed administrative controls TS changes for PNP, the NRC staff has determined that additional information is needed. The regulatory basis and the requested information are below. Timely and accurate response to this RAI is requested.

REGULATORY BASIS FOR REQUEST

Section 50.90, "Application for amendment of license, construction permit, or early site permit," on 10 CFR requires that whenever a licensee desires to amend the license, an application for an amendment must be filed with the Commission fully describing the changes desired and following, as far as applicable, the form prescribed for original license applications.

The NRC regulatory requirements related to the content of the TS are contained in 10 CFR 50.36. Specifically, 10 CFR 50.36(a)(1) states, in part, that "[e]ach applicant for a license authorizing operation of a production or utilization facility shall include in his application proposed technical specifications in accordance with the requirements of this section." In accordance with this requirement, TS will include items in the following five categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls.

The regulations at 10 CFR 50.36(c)(5) related to administrative controls state, in part:

Technical specifications will include items in the following categories: ...  
Administrative controls. Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

#### REQUESTS FOR ADDITIONAL INFORMATION

1. For TS Section 5.5, "Programs and Manuals," and Section 5.7, "High Radiation Area," the NRC staff notes that the licensee does not mention these sections in the LAR and no mark-up or retyped TS pages are provided. The NRC staff also notes that in Amendment No. 266 (ML18114A410) to the PNP TS, the licensee made changes to TS 5.5.1.c.2 and TS 5.5.15.b.2, which changed "superintendent" to "manager." In addition, for TS 5.7.2, the NRC staff notes that Amendment No. 266 to the PNP TS changed "shift supervisor" to "shift manager."

Based on the current request, it appears that the licensee is keeping the term "manager" in lieu of "superintendent," and the term "shift manger" in lieu of "shift supervisor," in these TS sections. Accordingly, the NRC staff requests the licensee review and make corrections to the current LAR, as appropriate, to identify and describe the language being retained in these two TS sections and provide markup or retyped TS pages as needed.

2. For TS 5.1.1, in the second paragraph the NRC staff notes that the word "his" was in front of "designee" prior to implementation of the PDTS. The licensee indicates that it is reinstating this TS in its entirety, with revision, to that which was in effect prior to the 10 CFR 50.82(a)(1) certifications being docketed for PNP in order to restore the PNP power operations RFOL but does not indicate the revision noted above. Accordingly, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.
3. For TS 5.2.2, the licensee indicates that it is reinstating this TS in its entirety to that which was in effect prior to the 10 CFR 50.82(a)(1) certifications being docketed for PNP in order to restore the PNP power operations RFOL. The NRC staff notes that the sentence: "The plant staff organization shall include the following" was not in the TS prior to implementation of the PDTS, which was Amendment No. 231 to the PNP TS; therefore, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.
4. For TS 5.2.2, the NRC staff notes that the title is being changed back to "Plant Staff" from "Facility Staff," but this revision is not discussed in the LAR. Accordingly, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.
5. For TS 5.2.2.c, the NRC staff notes that the references to TS 5.2.2.a and TS 5.2.2.g are missing periods between the last numeral and letter. Accordingly, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.
6. For TS 5.2.2.f and TS 5.2.2.g, the licensee indicates that it is reinstating these TS in their entirety, with revisions, to those which were in effect prior to the 10 CFR 50.82(a)(1) certifications being docketed for PNP in order to restore the PNP power operations RFOL. However, the NRC staff could not identify any revisions to these two TS as the proposed TS look identical to those in effect prior to implementation of the PDTS. Accordingly, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.

7. For TS 5.3, the NRC staff notes that the title is being changed back to “Plant Staff Qualifications” from “Facility Staff Qualifications,” but this revision is not discussed in the LAR. Accordingly, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.
8. For TS 5.3.1 and TS 5.3.5, the licensee indicates that it is reinstating these TS in their entirety, with revisions, to those which were in effect prior to the 10 CFR 50.82(a)(1) certifications being docketed for PNP in order to restore the PNP power operations RFOL. However, the NRC staff could not identify any revisions to these two TS as the proposed TS look identical to those in effect prior to implementation of the PDTS. Accordingly, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.
9. For TS 5.4.1.a and TS 5.4.1.b, the licensee indicates that it is reinstating these TS in their entirety, with revisions, to those which were in effect prior to the 10 CFR 50.82(a)(1) certifications being docketed for PNP in order to restore the PNP power operations RFOL. However, the NRC staff could not identify any revisions to these two TS as the proposed TS look identical to those in effect prior to the implementation of the PDTS. Accordingly, the NRC staff requests the licensee review and make corrections to the LAR, as appropriate.