



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

July 15, 2024

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

SUBJECT: PALISADES NUCLEAR PLANT – RESTART INSPECTION REPORT  
05000255/2024011

Dear Mike Mlynarek:

On May 1, 2024, and May 10, 2024, respectively, the U.S. Nuclear Regulatory Commission (NRC) completed two inspections at the Palisades Nuclear Plant. The enclosed inspection report documents these inspection results, which the inspectors discussed on May 1, 2024, and May 10, 2024, with you and other members of your staff.

Based on the results of these inspections, no findings or violations were identified.

On June 13, 2022, Palisades ceased permanent power operations and subsequently removed all fuel from the reactor, as detailed in the letter from Entergy to the NRC, "Certifications of Permanent Cessation of Power Operations and Permanent Removal of Fuel from the Reactor Vessel," (ADAMS Accession No. ML22164A067). On September 28, 2023, Holtec Decommissioning International, LLC (Holtec) submitted a letter to the NRC requesting exemptions from certain portions of the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.82(a)(2) to pursue the potential reauthorization of power operations at Palisades (ADAMS Accession No. ML23271A140). The NRC's initial acceptance to review Palisades' request for exemptions was documented in ADAMS at Accession No. ML23291A440 on November 3, 2023.

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* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,



Signed by Nguyen, April  
on 07/15/24

April M. Nguyen, Lead  
Palisades Restart Team  
Division of Operating Reactor Safety

Docket No. 05000255  
License No. DPR-20

Enclosure:  
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Mike Mylnarek from April Nguyen dated July 15, 2024.

SUBJECT: PALISADES NUCLEAR PLANT – RESTART INSPECTION REPORT  
05000255/2024011

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**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Number: 05000255

License Number: DPR-20

Report Number: 05000255/2024011

Licensee: Holtec Decommissioning International, LLC

Facility: Palisades Nuclear Plant

Location: Covert, MI

Inspection Dates: April 29 – May 10, 2024

Inspectors: B. Bergeon, Senior Operations Engineer  
J. Cassidy, Senior Health Physicist  
T. Henning, Senior Operations Engineer

Approved By: April M. Nguyen, Lead  
Palisades Restart Team  
Division of Operating Reactor Safety

## **SUMMARY**

This report covers announced inspections completed by regional inspectors.

The U.S. Nuclear Regulatory Commission (NRC) performed inspections of the licensee's activities to ensure the adequate protection of workers and the public under the radiation safety cornerstone and to assess requalification training and evaluation of previously licensed operators under the reactor safety cornerstones.

### **List of Findings and Violations**

No findings or violations of more than minor significance were identified.

### **Additional Tracking Items**

None.

## PLANT STATUS

The Palisades Nuclear Plant ceased permanent power operations and subsequently removed all fuel from the reactor, as certified in a letter to the NRC on June 13, 2022. On September 28, 2023, Holtec Decommissioning International, LLC (Holtec) submitted a letter to the NRC requesting exemptions from certain portions of the requirements of 10 CFR 50.82(a)(2) to pursue the potential reauthorization of power operations. The NRC is conducting inspections to evaluate and assess the licensee's activities for potential restoration to an operational status.

## INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the referenced inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

## REACTOR SAFETY CORNERSTONES

### 71111.11B - Licensed Operator Requalification Program and Licensed Operator Performance

#### (1) Biennial Requalification Written Examinations

The inspectors evaluated the quality of the licensed operator biennial requalification written examinations administered on April 26, May 3, and May 10, 2024.

#### Annual Requalification Operating Tests

The inspectors evaluated the adequacy of the facility licensee's annual requalification operating tests administered during the weeks of April 22, April 29, and May 6, 2024.

#### Administration of an Annual Requalification Operating Test

The inspectors evaluated the effectiveness of the facility licensee in administering requalification operating tests required by 10 CFR 55.59(a)(2) and that the facility licensee is effectively evaluating their licensed operators for mastery of training objectives.

#### Requalification Examination Security

The inspectors evaluated the ability of the facility licensee to safeguard examination material, such that the examination is not compromised.

#### Remedial Training and Re-examinations

The inspectors evaluated the effectiveness of remedial training conducted by the licensee, and reviewed the adequacy of re-examinations for licensed operators who did not pass a required requalification examination.

### Operator License Conditions

The inspectors evaluated the licensee's program for ensuring that licensed operators meet the conditions of their licenses.

### Control Room Simulator

The inspectors evaluated the adequacy of the facility licensee's control room simulator in modeling the actual plant, and for meeting the requirements contained in 10 CFR 55.46. Control room simulator fidelity was previously evaluated on March 13, 2024, and documented in Inspection Report 05000255/2024010 (ADAMS Accession No. ML24078A315).

## **RADIATION SAFETY CORNERSTONE**

### 71124.01 - Radiological Hazard Assessment and Exposure Controls

#### Radiological Hazard Assessment (IP Section 03.01)

- (1) The inspectors evaluated how the licensee identifies the magnitude and extent of radiation levels and the concentrations and quantities of radioactive materials and how the licensee assesses radiological hazards.

#### Instructions to Workers (IP Section 03.02)

- (1) The inspectors evaluated how the licensee instructs workers on plant-related radiological hazards and the radiation protection requirements intended to protect workers from those hazards.

#### Radiological Hazards Control and Work Coverage (IP Section 03.04)

The inspectors evaluated the licensee's control of radiological hazards for the following radiological work:

- (1) Unit 1 lifting the reactor head from the reactor cavity to the reactor head stand
- (2) Unit 1 removal and replacement of the reactor head O-ring
- (3) Cleaning and decontamination of the Unit 1 reactor flange and O-ring groove

#### High Radiation Area and Very High Radiation Area Controls (IP Section 03.05)

The inspectors evaluated licensee controls of the following High Radiation Areas and Very High Radiation Areas:

- (1) Unit 1 containment building
- (2) Unit 1 reactor cavity
- (3) Unit 1 head stand area when reactor head was on stand

Radiation Worker Performance and Radiation Protection Technician Proficiency  
(IP Section 03.06)

- (1) The inspectors evaluated radiation worker and radiation protection technician performance as it pertains to radiation protection requirements.

**INSPECTION RESULTS**

No findings or violations were identified during these inspections.

**EXIT MEETINGS AND DEBRIEFS**

The inspectors verified no proprietary information was retained or documented in this report.

- On May 1, 2024, the inspectors presented the radiation protection inspection results to G. Wright, Radiation Protection Manager, and other members of the licensee staff.
- On May 10, 2024, the inspectors presented the licensed operator requalification program results to M. Mlynarek, Site Vice President, and other members of the licensee staff.

**DOCUMENTS REVIEWED**

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.11B	Miscellaneous		Simulator Scenario SES-245	2
			Simulator Scenario SES-246	2
			Simulator Scenario SES-249	2
			Simulator Scenario SES-270	1
			Simulator Scenario SES-277	1
			Simulator Scenario SES-278	1
			Simulator Scenario SES-300	0
			Job Performance Measure PLJPM-LOR-RO Admin 17	1
			Job Performance Measure PLJPM-LOR-SRO Admin 17	0
			Job Performance Measure PLJPM-LOR-AFW-05	3
			Job Performance Measure PLJPM-LOR-ELEC-01	2
			Job Performance Measure PLJPM-LOR-EOP-28	3
			Job Performance Measure PLJPM-LOR-EOP-55	1
			Job Performance Measure PLJPM-LOR-RO Admin 8	1
			Job Performance Measure PLJPM-LOR-SRO Admin 18	0
			Job Performance Measure PLJPM-LOR-AFW-06	0
			Job Performance Measure PLJPM-LOR-AOP-34	2
			Job Performance Measure PLJPM-LOR CPS-01	1
			Job Performance Measure PLJPM-LOR-AOP-41	1
			Job Performance Measure PLJPM-LOR-RO Admin 9	1
			Job Performance Measure PLJPM-LOR-SRO Admin 19	0
			Job Performance Measure PLJPM-LOR-AOP-14A	4
			Job Performance Measure PLJPM-LOR-EOP-13	3
			Job Performance Measure PLJPM-LOR-PZR-04	5
			Job Performance Measure PLJPM-LOR-CRD-01	1
			2024 LOR Biennial RO-SRO Exam 1	0
			2024 LOR Biennial RO-SRO Exam 2	0
			2024 LOR Biennial RO-SRO Exam 3	0
			24R1/24R2/24R3/24R4 LOR Training Cycle Schedules	
			Shift 1 Crew Notebook	
	Shift 2 Crew Notebook			

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			Shift 3 Crew Notebook	
			Shift 4 Crew Notebook	
			Shift 5 Crew Notebook	
	Procedures	PAL-2176	Sentinel Login Issue Extremity Multi-packs	04/29/2024
		PAL-02185	NRC Questioned Potential Inconsistencies	04/30/2024
		PNT-114	Licensed Operator Requalification Training Program Description	1
		PNT-201	Systematic Approach to Training Process	0
		PNT-210	Conduct of Simulator Training	0
		PNT-217	Examination Security	1
		PNT-218	Licensed Operator Requalification Annual and Biennial Exam Development	2
		PNT-201-TF-10	Remediation Form	0
PNT-024-TF-SBT	Scenario Based Testing Scenario 249 LOR Exam Scenario	2		
LOR 2024-2026	LOR Long Range Training Plan	0		
71124.01	Miscellaneous		Radiological Work Permit and Associated ALARA Plan, 20240433, Disassembly of the Rx Head, Reset the Rx Head in the Cavity, and Associated Work Activities (Supports Re-Start/PCS Chem Decon)	00
			Radiological Survey Sheet Number 2024-0201, 649' CTMT General Areas	04/30/2024
			Airborne Radioactivity Calculation Form, 2024-AS-0173, Vacuum Head	04/26/2024
			Airborne Radioactivity Calculation Form, 2024-AS-0170, FME Walkdown in Cavity	04/26/2024
			Airborne Radioactivity Calculation Form, 2024-AS-0171, FME Walkdown in Cavity	04/26/2024
			Lapel Air Sample Alpha Analysis, 2024-AS-0186, Head Stand/ Clean Under Head	04/30/2024

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71124.05	Procedures	EN-RP-131	Air Sampling	
		EN-RP-122	Alpha Monitoring	
		EN-RP-141	Job Coverage	
		EN-RP-503	Selection, Issue and Use of Respiratory Protection Equipment	