

From: [Marlayna Doell](#)
To: [James Miksa](#)
Cc: [Gary Nyberg](#); [Johann Britting](#); [Amy Filbrandt](#)
Subject: RE: DRAFT Request for Additional Information: Palisades Operating Final Safety Analysis Report
Date: Friday, November 22, 2024 3:49:00 PM
Attachments: DRAFT REQUEST FOR ADDITIONAL INFORMATION - Palisades Operating TS License Amendment Request - 11-22 Revision - MAS.docx

Dear Jim Miksa,

By letter dated December 14, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML23348A148](#)), 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) related to this request; this RAI request replaces in its entirety the request from October 30, 2024, and removes the question related to the Palisades renewed license, which the staff has determined will be addressed in oversight space or via other regulatory methods than the current license amendment request. The NRC's Office of the General Counsel has reviewed these RAIs.

Please contact me to schedule a clarification discussion if necessary. 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) 415-3178 or marlayna.doell@nrc.gov. Thank you and I hope you have a great week!

Cheers,
Marlayna

[Marlayna Vaaler Doell](#)

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Decommissioning Project Manager  
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**From:** Marlayna Doell

**Sent:** Wednesday, October 30, 2024 12:52 AM

**To:** James Miksa <j.miksa@holtec.com>

**Cc:** Justin Poole (He/Him) <Justin.Poole@nrc.gov>; Gary Nyberg <g.nyberg@holtec.com>; Johann Britting <j.britting@holtec.com>; Amy Filbrandt <a.filbrandt@holtec.com>

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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). Please contact me to schedule a clarification discussion if necessary. 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) 415-3178 or [marlayna.doell@nrc.gov](mailto:marlayna.doell@nrc.gov). Thank you and I hope you have a great week!

Cheers,  
Marlayna

Marlayna Vaaler Doell

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

INTRODUCTION

By application dated December 14, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML23348A148](#)), 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 RFOL, the Permanently Defueled Technical Specifications (PDTs), and the Environmental Protection Plan 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) of section 50.36, "Technical specifications," of Title 10 of the *Code of Federal Regulations* (10 CFR) related to TS requirements that are necessary to support power operations. 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 operating 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 responses to these questions are requested.

REGULATORY BASES FOR REQUEST

Section 50.90, "Application for amendment of license, construction permit, or early site permit," of 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. Under paragraph (a) of 10 CFR 50.92, "Issuance of amendment," the NRC determinations on license amendment requests "will be guided by the considerations which govern the issuance of initial licenses ... to the extent applicable and appropriate."

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 (as pertinent to operating nuclear power reactors): (1) safety limits and limiting safety system

settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls.

Paragraph (b) of 10 CFR 50.34, "Contents of applications; technical information," states, in part, that each operating license shall include a final safety analysis report (FSAR). The final safety analysis report must include information that describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components and of the facility as a whole. Furthermore, 10 CFR 54.37, "Additional records and recordkeeping requirements," addresses the recordkeeping requirements related to the FSAR as it pertains to the extended period of operation.

REQUESTS FOR ADDITIONAL INFORMATION

1. In Section 2.2, "Description of Proposed Change," of the Enclosure to the LAR, the licensee explains that the Updated Final Safety Analysis Report (UFSAR), currently titled the Defueled Safety Analysis Report (DSAR), will be updated via the 10 CFR 50.59, "Changes, tests and experiments," process "to reflect the docketed version that was in effective prior to the 10 CFR 50.82(a)(1) certifications, PNP UFSAR Revision 35," which is available at ADAMS Accession No. [ML21125A344](#). Section 2.2 further states:

Any DSAR retained changes to UFSAR Revision 35 have been or will be evaluated via the 10 CFR 50.59 process against UFSAR Revision 35 to determine if NRC approval is required prior to exiting the period of decommissioning. This will include reinstatement of accident analyses and the safety classification of systems, structures, and components (SSCs), required to support the PNP power operations licensing basis (POLB). Changes made to the UFSAR after Revision 35 will be evaluated for retention, to the extent appropriate for an operating plant. The DSAR change back to the PNP POLB UFSAR will be accomplished under the 10 CFR 50.59 process and be implemented coincident with the associated license amendments.

In addition to this general statement regarding restoration of the UFSAR to the previous Revision 35, the application cites the content of UFSAR Revision 35 in support of numerous proposed changes to the license and technical specifications.

The content of the UFSAR is important for the NRC staff's review because an acceptable UFSAR is necessary for authorized reactor operation under an NRC license and the licensee is relying on the proposed UFSAR content to support specific proposed changes to the license. As stated above, HDI plans to make or retain other UFSAR changes in addition to restoring the UFSAR to Revision 35, but the application does not specifically describe these changes or explain why they are acceptable. Under 10 CFR 50.90, an application for an amendment must "fully describ[e]" the changes.

Accordingly, please (1) specifically describe any planned differences from the content of UFSAR Revision 35 (including the planned retention of DSAR changes to UFSAR Revision 35) and (2) explain why these differences from Revision 35 are acceptable and satisfy the standards in 10 CFR 50.92(a) for license amendments.

2. The operating TS LAR was supplemented on July 9, 2024 ([ML24191A422](#)), to correct several editorial errors. However, three additional minor errors were introduced by these changes and should be addressed in the final version of the operating TS for PNP.

Specifically, Attachment 2, "Updated Retyped Pages for the Palisades Plant," of Enclosure 2 (begins on page 23 of 111 of the supplemental information) contains the following errors:

Item	TS Page Number in Enclosure 2 Attachment 2	Error
1	3.4.15-2	<p>Enclosure 2, Attachment 2 is missing replacement page 3.4.15-2.</p> <p>Replacement page instructions (enclosure page 12 of 14) identified that page 3.4.15-2 was to be updated, which the NRC staff verified is correct. However, page 3.4.15-2 was not included in Enclosure 2, Attachment 2.</p>
2	3.4.16-1	<p>Enclosure 2, Attachment 2 should not have included replacement page 3.4.16-1.</p> <p>Replacement page instructions (enclosure page 12 of 14) did not include replacing page 3.4.16-1, which the NRC staff verified is correct. However, page 3.4.16-1 was included in Enclosure 2, Attachment 2 <u>and</u> introduced an editorial error.</p> <p>Specifically, this page was not missing the expression "(continued)" after ACTIONS but "(continued)" was added in the supplemental information. This is an error because it is the beginning of the Actions Table, not a continuation (see page 55 of 111 of the supplemental information).</p>
3	3.8.1-7	<p>The font color for the whole page appears to be a light gray rather than black, and should be corrected in the final version of the operating TS.</p>