



PNP 2025-011

10 CFR 50.90

February 27, 2025

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Palisades Nuclear Plant
NRC Docket No. 50-255
Renewed Facility Operating License No. DPR-20

Reference: Holtec Palisades, LLC Letter to U.S. Nuclear Regulatory Commission (PNP 2025-002), "License Amendment Request to Include Leak Before Break Methodology for Primary Coolant System Hot and Cold Leg Piping in Palisades Licensing Basis," dated February 5, 2025 (ADAMS Accession No. ML25035A216)

Subject: Supplement to License Amendment Request to Include Leak Before Break Methodology for Primary Coolant System Hot and Cold Leg Piping in Palisades Licensing Basis

In the above referenced letter, PNP 2025-002, Holtec¹ requested U.S. Nuclear Regulatory Commission (NRC) review and approval of a proposed license amendment request (LAR) to revise the Palisades Nuclear Plant (PNP) licensing basis to include Leak Before Break (LBB) methodology for Primary Coolant System (PCS) hot and cold leg loop piping.

Since submittal of PNP 2025-002, PNP has identified several items that potentially could require clarification or administrative corrections and is submitting this supplemental information to provide further clarity and administrative corrections to the PNP 2025-002 enclosure titled, "Description and Evaluation of Proposed Changes."

This supplement does not alter the no significant hazards consideration contained in PNP 2025-002.

In accordance with 10 CFR 50.91(b), *State consultation*, Holtec is notifying the State of Michigan of this proposed license amendment supplement by transmitting a copy of this letter, with its enclosure, to the designated State of Michigan official.

If you have any questions regarding this submittal, please contact Amy Filbrandt, Acting Regulatory Assurance Manager, at (269) 764-2520.

¹ Holtec Palisades, LLC ("Holtec Palisades") is the licensed owner of PNP. Holtec Decommissioning International, LLC ("HDI") is the licensed operator of PNP while the facility is in decommissioning. Pursuant to the license transfer application submitted in connection with the PNP restart (ML23340A161), licensed authority will transfer from HDI to Palisades Energy, LLC ("Palisades Energy") upon NRC's approval of the transition from decommissioning back to power operations. Holtec Palisades will remain the licensed owner of PNP.

This letter contains no new regulatory commitments and no revisions to existing regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 27, 2025.

Respectfully,

**Jean A.
Fleming**



Digitally signed by Jean A. Fleming
DN: cn=Jean A. Fleming, o=Holtec
Decommissioning International, LLC,
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Jean A. Fleming
Vice President, Licensing and Regulatory Affairs
Holtec International

Enclosure: Updates to License Amendment Request (LAR) Description and Evaluation of Proposed Changes

cc: NRC Region III Regional Administrator
NRC Senior Resident Inspector – Palisades Nuclear Plant
NRC Project Manager – Palisades Nuclear Plant
Designated Michigan State Official

PNP 2025-011

Enclosure

**Updates to License Amendment Request (LAR)
Description and Evaluation of Proposed Changes**

**Updates to License Amendment Request (LAR)
Description and Evaluation of Proposed Changes**

Provided below is supplemental information and administrative updates to the Holtec Palisades, LLC (Holtec Palisades) Letter to U.S. Nuclear Regulatory Commission (PNP 2025-002), "License Amendment Request to Include Leak Before Break Methodology for Primary Coolant System Hot and Cold Leg Piping in Palisades Licensing Basis," dated February 5, 2025 (ADAMS Accession No. ML25035A216) for Palisades Nuclear Plant (PNP). PNP is submitting this supplemental information to provide further clarity and administrative corrections to PNP 2025-002.

The supplemental information and administrative updates are listed below as items and are arranged in the order in which they appear in PNP 2025-002. For each item the location in PNP 2025-002, the original text in PNP 2025-002, the updated text, and the reason for the change is provided.

Item 1 – PNP 2025-002 Enclosure, "Description and Evaluation of the Proposed Changes"

Section affected: 3.1.2 CEN-367-A Application to PNP, Page 15 of 47, Inservice Inspection Program 2 nd paragraph, 2 nd sentence	
PNP 2025-002 text	Updated text
"The ISI program maintained safety and compliance with evolving industry standards by program adherence to ongoing updates and regulation."	"The ISI program maintains maintained safety and compliance with evolving industry standards by adhering program adherence to ongoing updates and regulation."
Reason: This editorial revision corrects the tense of the word maintain. Use of present tense is consistent with transition to a Power Operations Licensing Basis (POLB) as explained on page 3 of the LAR Enclosure.	

Item 2 – PNP 2025-002 Enclosure, "Description and Evaluation of the Proposed Changes"

Section affected:	
3.1.4 Compliance with NUREG-0800, Section 3.6.3, "Leak-Before-Break Evaluation Procedures," Page 33 of 47, <u>Screening Criteria for Degradation Mechanisms</u> 1 st paragraph, 1 st sentence	
PNP 2025-002 text	Updated text
"NUREG 0800, Section 3.6.3 specifies that the piping requested for the LBB application should not experience active degradation mechanisms such as erosion/corrosion (wall thinning), stress corrosion cracking (SCC), water hammer, creep and cleavage failure, brittle failure, cycle fatigue, thermal stratification and aging."	"NUREG 0800, Section 3.6.3 specifies that the piping requested for the LBB application should not experience active degradation mechanisms such as erosion/corrosion (wall thinning), stress corrosion cracking (SCC), water hammer, creep and cleavage failure, brittle failure, cyclic - cycle fatigue, thermal stratification and aging."
Reason:	
This editorial correction is provided to replace the word cycle with cyclic.	

Item 3 – PNP 2025-002 Enclosure, "Description and Evaluation of the Proposed Changes"

Section affected:	
3.1.4 Compliance with NUREG-0800, Section 3.6.3, "Leak-Before-Break Evaluation Procedures," Page 34 of 47, Erosion/Corrosion (Wall Thinning) 3 rd paragraph, 3 rd sentence	
PNP 2025-002 text	Updated text
"Temperature during normal operation is maintained within a narrow range by the control rod positions; pressure is also controlled within a narrow range for steady-state conditions by the pressurizer heaters and pressurizer spray."	"Temperature during normal operation is maintained within a narrow range by the control rod positions along with PCS boration and dilution using the CVCS ; pressure is also controlled within a narrow range for steady-state conditions by the pressurizer heaters and pressurizer spray."
Reason:	
This clarification is provided because while reactor power level and primary coolant system (PCS) temperature can be adjusted by control rod position, PCS temperature can also be controlled via boration and dilution of the PCS using the Chemical Volume and Control System (CVCS).	

Item 4 – PNP 2025-002 Enclosure, "Description and Evaluation of the Proposed Changes"

Section affected:	
3.1.4 Compliance with NUREG-0800, Section 3.6.3, "Leak-Before-Break Evaluation Procedures," Page 35 of 47, Water Hammer 1 st paragraph, 1 st sentence	
PNP 2025-002 text	Updated text
"The potential for water hammer in the PCS piping is low because they are designed and operated to preclude a voiding condition and the PCS has no valves."	"The potential for water hammer in the PCS piping is low because the PCS is they are designed and operated to preclude a voiding condition and the PCS HL and CL piping has no valves."
Reason:	
This revision is provided to clarify that the PCS loop piping has no installed valves in contrast with the PCS branch piping that does contain valves.	

Item 5 – PNP 2025-002 Enclosure, "Description and Evaluation of the Proposed Changes"

Section affected:	
5, Environmental Consideration, Page 44 of 47, 1 st paragraph, last sentence	
PNP 2025-002 text	Updated text
"Consistent with this LAR's No Significant Hazards Consideration in Section 4.3; i) The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, ii) The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated, and iii) The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated."	"Consistent with this LAR's No Significant Hazards Consideration in Section 4.3; i) The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, ii) The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated, and iii) The proposed amendment does not involve a significant reduction in a margin of safety The proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated. "
Reason:	
This editorial correction is being made because item ii) was repeated as item iii). The correct item iii) replaces the duplicate.	