



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

March 14, 2025

LICENSEE: Holtec Decommissioning International, LLC

FACILITIES: Palisades Nuclear Plant

SUBJECT: SUMMARY OF JANUARY 14, 2025, HYBRID PUBLIC MEETING ON HOLTEC'S PLAN TO SUBMIT A LEAK BEFORE BREAK AND A STEAM GENERATOR TUBE SLEEVE AMENDMENTS AT PALISADES NUCLEAR PLANT

On January 14, 2025, a hybrid Observation meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and Holtec Decommissioning International (HDI) on pre-submittal discussions pertaining to two separate proposed license amendment requests (LARs) for the Palisades Nuclear Plant (Palisades). In-person attendees participated at the NRC headquarters in Rockville, Maryland while others were able to do so via the Microsoft Teams. The meeting included an open session and a closed session.

The purposes of the meeting were to: 1) discuss HDI's proposed LAR to include the leak-before break (LBB) methodology in the Palisades licensing basis and 2) discuss HDI's proposed LAR to support repairing steam generator (SG) tubes by a sleeving technique. The meeting notice and agenda dated December 11, 2024, are available at Agencywide Documents Access and Management System Accession No. ML25007A020. A list of in person and virtual meeting attendees is provided as an enclosure to this summary. The meeting slides are summarized below and can be found at ADAMS Accession No. ML25006A181.

The meeting started with HDI's first presentation regarding their proposed LAR to include the LBB methodology in the Palisades licensing basis. HDI began by establishing the background of the use of LBB at Combustion Engineering Owners Group (CEOG) plants, such as Palisades, referencing the NRC's approval of Topical Report CEN-367-A in 1990 and a Safety Evaluation Report (SER) recognizing that CEN-367-A was bounding for Palisades. The HDI presenter then described the contents of the LAR, informing the NRC staff that it would not be making any changes to Palisades' Technical Specifications (TS), and would be following the requirements of the SER, which requires licensees to submit information to demonstrate that a plant's leakage detection systems are consistent with those found in Regulatory Guide (RG) 1.45 "Reactor Coolant Pressure Boundary Leakage Detection Systems" (ML003740113) in order to support LBB application in a plant's licensing basis. HDI stated that the LAR would also address plant changes that have occurred since the NRC's approval of CEN-367-A in 1990, namely the SG replacement in 1990 and the licensing renewal for aging management in 1991. HDI concluded by referencing the precedent for the use of LBB at other plants, then shared HDI's tentative schedule for the LAR, stating their intent to submit the LAR in February 2025 (it has since been submitted on February 4, 2025 (ML25035A216)), their request that the NRC review the submission on a schedule that will permit approval of the proposed LAR by August 15, 2025, and a target implementation in September 2025. The NRC staff asked some clarifying questions related to statements HDI made about adherence to RG 1.45 and recommended any deviations from the guidance to be specifically pointed out and proper justification provided. Given the

licensee is requesting a shorter than typical review timeframe, the NRC staff recommended providing more detail in the application, rather than provide a number of references the staff may not have access to and would then need to get via a request for additional information.

HDI's second presentation concerned their proposed LAR to support repairing SG tubes by sleeving. HDI began by establishing a background on the issue, outlining how, in the current proposed technical specifications (TS) to support restarting the plant, the only method of removing degraded tubes from operation is to plug them. HDI then explained how the LAR would change this by allowing for degraded tubes to be repaired by installing Alloy 690 sleeves in the tubes. HDI elaborated on the proposed changes in the LAR, which would: 1) allow for degraded SG tubes to be repaired using sleeving; 2) establish verification requirements of primary coolant system flow rate when either plugging or sleeving ten or more SG tubes; 3) establish inspection and reporting requirements for sleeved tubes; 4) provide changes to the TS generally consistent with standard TS at other CEONG power plants. HDI then described Framatome's role in consulting on the design, use, and maintenance of the sleeves. Specifically, HDI explained that Framatome would provide technical documents addressing areas such as sleeve design, installation, materials selection and corrosion evaluation, inspection, and operating experience. HDI referenced the use of sleeving at other plants, though the NRC staff pointed out that those other plants used different methodologies and different materials. Like the LBB LAR, HDI anticipated a February 2025 submission (it has since been submitted on February 11, 2025 (ML25043A348)), requests that the NRC review the submission such that, if approved, the LAR would be processed by August 15, 2025, and a target implementation in September 2025. As with the LBB LAR submittal discussion, the NRC staff recommended providing more detail in the application, rather than provide a number of references the staff may not have access to and would then need to get via a request for additional information. The NRC staff asked if these sleeves had been installed at other sites. The licensee/Framatome stated that while sleeves have this type have been installed at other heat exchangers, they have not been used in a SG at a nuclear plant. When asked by the staff, the licensee stated that should a flaw be detected in a sleeved tube, that tube will be plugged.

During the closed session, which the slides are publicly available and found at ADAMS Accession No. ML25006A181, the NRC staff and HDI representatives went into greater detail on the design of the sleeves, sleeve installation, qualification testing, inspection both prior and after installation of the sleeves.

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's plan to sleeve the SG tubes, while others were against sleeving the tubes. Most that were against sleeving the tubes thought that the NRC should make the licensee replace the SGs. The NRC staff explained that the standards in place for the NRC staff to review the licensee's proposed plan are the same as those if the licensee chose to replace the SGs.

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.

Sincerely,

/RA/

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

Docket No. 50--255

Enclosure:
List of Attendees

cc: Listserv

List of Attendees

January 14, 2025, Public Outreach Meeting for the Potential Palisades Nuclear Plant

Restart

U.S. Nuclear Regulatory Commission

- Jamie Pelton, Deputy Director, Office of Nuclear Reactor Regulation (NRR)/Division of Operating Reactor Licensing (DORL)
- Ilka Berrios, Branch Chief, NRR/DORL/LPL3
- Justin Poole, Restart Project Manager, NRR/DORL/Plant Licensing Branch III (LPL3)
- Ngola Otto, Project Manager, NRR/DORL/Licensing Projects Branch (LLPB)
- Marlayna Doell, Project Manager, NRR/DORL/LPL3
- Philip McKenna, Deputy Director, NRR/Division of Reactor Oversight (DRO)
- Jason Kozal, Director, Region III (RIII)/Division of Operating Reactor Safety (DORS)
- April Nguyen, Team Leader, RIII/DORS/Palisades Restart Team (PRT)
- Julie Winslow, Senior Project Engineer, RIII/DORS/PRT
- Steven Bloom, Branch Chief, NRR/ Division of New and Renewed Licenses (DNRL)/Corrosion and Steam Generator (NCSG)
- Paul Klein, Senior Materials Engineer, NRR/DNRL/NCSG
- Andrew Johnson, Senior Materials Engineer, NRR/DNRL/NCSG
- Miranda Ross (She/Her), Materials Engineer, NRR/DNRL/NCSG
- Joel Jenkins, Materials Engineer, Materials Engineer, NRR/DNRL/NCSG
- Eric Reichelt, Senior Materials Engineer, NRR/DNRL/Piping and Head Penetration Branch (NPHP)
- Seung Min, Materials Engineer, NRR/DNRL/NPHP
- Angelo Stubbs, Senior Safety and Plant Systems Engineer/Division of Safety Systems (DSS)/Containment and Plant Systems Branch (SCPB)
- Harry Wagage, Senior Safety and Plant System Engineer, NRR/DSS/SCPB
- David Nold, Safety and Plant Systems Engineer/DSS/SCPB
- Laura Willingham, Environmental Project Manager, Office of Nuclear Material Safety and Safeguards (NMSS)/Division of Rulemaking, Environmental, and Financial Support (REFS)/Environmental Review New Reactors Branch 3 (ENRB3)
- Mary Richmond, Environmental Project Manager, NMSS/REFS/ENRB3
- Michael Norris, Senior Emergency Preparedness Specialist, Office of Nuclear Security and Incident Response (NSIR)/Division of Preparedness and Response (DPR)/Reactor Licensing Branch (RLB)
- Keith Miller, Emergency Preparedness Specialist, NSIR/DPR/RLB
- Charles Murray, Emergency Preparedness Specialist, NSIR/DPR/Policy, and Oversight Branch (POB)
- Michael Spencer, Senior Attorney, Office of the General Counsel (OGC)
- Anita Ghosh Naber, Senior Attorney, OGC
- Peter Lom, Attorney, OGC
- Corban Ryan, Attorney, OGC
- Kevin Bernstein, Attorney, OGC
- Harral Logaras, Regional Governmental Liaison Specialist, RIII
- Viktoria Mitlyng, Public Affairs Officer, R3/Office of Public Affairs (OPA)
- Greg Halnon, ACRS Member

- Ron Ballinger, ACRS Member
- Quynh Nguyen, Senior Staff Engineer, ACRS
- Joseph Mancuso, Senior Resident Inspector, RIII/DORS/PRT
- Takuma Okamoto, Resident Inspector, RIII/DORS/PRT
- Liam O'Donoghue, General Engineer, Office of the Chief Human Capital Officer (OCHCO)/Human Resources Learning and Development (HRLD)/Nuclear Regulator Apprenticeship Network Branch (NRANB)
- Jacob Davis, General Engineer, OCHCO/HRLD/NRANB
- Alexandra Terres, General Engineer, OCHCO/HRLD/NRANB
- Rachel Qian, General Engineer, OCHCO/HRLD/NRANB
- Sam Cohen, General Scientist, OCHCO/HRLD/NRANB
- Prema Chandrathil, Public Affairs Officer, RIII/Office of Public Affairs (OPA)
- Sophie Holiday, Senior Emergency Response Coordinator, NSIR/DPR/Coordination Branch
- Marlena Tatkowski, Reactor Inspector, RIII/DORS/ERP
- Scott Burnell, Public Affairs Officer, OPA
- Christine Saah Nazer, Public Affairs Officer, OPA
- Carolyn Wolf, Office of Congressional Affairs
- Eric Magnuson, Reactor Inspector, RIII/DORS/ERP
- Jay Wallace, Materials Engineering Branch
- Atif Shaikh, Senior Reactor Inspector, RIII
- Dan Hoang, Civil Engineer, NRR
- Daniel King, Technical Assistant, NRR/DORL
- Samantha Matthews, Reactor Inspector, RIII
- Pete Snyder, Senior Engineer, Office of the Inspector General
- Noah Bolling, Resident Inspector, RIII
- Deion Atkinson, Project Manager, NRR
- Surinder Arora, Project Manager, NRR
- John Wise, Reactor Systems Engineer, NRR
- Matthew Domke, Senior Reactor Inspector, RIII
- Joey McPherson, Reactor Operations Engineer, NRR
- Alysia Bone, Technical Assistant for Reactors, Office of the Chairman
- Jack Vande Polder (He/Him), Reactor Systems Engineer, NRR
- Leah Parks (She/Her), Environmental Scientist, NMSS
- Diane Screnci (She/Her), Senior Public Affairs Officer, RI
- Cyler Conrad, PNNL

Holtec Decommissioning International, LLC (Holtec)

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- Michael Schultheis
- Joseph Jerz
- Steve Overway
- Clyde Mackaman
- Johann Britting
- Stephanie Liska
- Chad Main
- Carmen Mazzagatti
- Aleksey Rezvyi

Framatome

- Raj Persad
- Richard Coe
- Philip Opsal
- Morris Byram
- Steve Kane
- Tim Schmitt (FRA-IB)
- Samer Mahmoud (FRA-IB)
- Tyler Whaley (FRA-IB)
- Jerald Daniel (FRA-IB)
- David Foust (FRA-IB)
- Kris Cecil (FRA-IB)

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- Tom Palmisano
- Jana Bergman
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- Dave E. Simonelli
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- Jody Flynn
- Keith Disselkoen, (MSP)
- Lee Blackburn
- Michael Reed
- Kenneth Lee Fossum
- Barbara J. Rose
- Lee J. DuBois
- Jerry Humphreys, [DEP]
- Will Cothen
- Alexis Waiss
- Mitchell Krinock
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- Geoffrey Rose

- Jay E. Silberg
- Rockey Adams
- Kevin Kamps, Beyond Nuclear
- Terry Alsterda
- Dr. Bruce Davis
- Spencer Toohill
- Dave Allard
- Daniel F. Elliott
- Nicole Vitale
- Theodore R. Wentworth, (EGLE)
- Alvin Leong
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ADAMS Accession Nos.:

ML25069A474 (Package)

ML25069A469 (Meeting Summary)

ML25007A020 (Meeting Notice)

ML25006A181 (Slides)

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DATE	03/10/2025	03/10/2025	03/12/2025	03/14/2025

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