



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

July 24, 2025

Ms. Jean A. Fleming
Vice President, Licensing,
Regulatory Affairs, and PSA
Holtec International, LLC
Krishna P. Singh Technology Campus
1 Holtec Boulevard
Camden, NJ 08104

SUBJECT: PALISADES NUCLEAR PLANT - ISSUANCE OF AMENDMENT NO. 277 RE:
AMENDMENT REQUEST TO REVISE SELECTED PERMANENTLY
DEFUELED TECHNICAL SPECIFICATIONS ADMINISTRATIVE CONTROLS
TO SUPPORT RESUMPTION OF POWER OPERATIONS
(EPID L-2024-LLA-0013)

Dear Ms. Fleming:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 277 to Renewed Facility Operating License No. DPR-20 for the Palisades Nuclear Plant (PNP). The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated February 9, 2024, as supplemented by letter dated July 31, 2024. The amendment revises selected sections of the permanently defueled TSs to reflect the reauthorization of power operations at PNP.

The NRC staff has separately reviewed and approved Holtec's license transfer application, exemption request, and three license amendment requests related to the resumption of power operations at PNP. The NRC staff is issuing its approval of these actions concurrently with its approval of this amendment to reauthorize power operations at PNP.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

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

Docket No. 50-255

Enclosures:

1. Amendment No. 277 to DPR-20
2. Safety Evaluation

cc: Listserv



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

HOLTEC PALISADES, LLC

PALISADES ENERGY, LLC

DOCKET NO. 50-255

PALISADES NUCLEAR PLANT

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 277
License No. DPR-20

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment filed by Holtec Decommissioning International, LLC1, on behalf of Holtec Palisades, LLC, dated February 9, 2024, as supplemented by letter dated July 31, 2024, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," of the Commission's regulations and all applicable requirements have been satisfied.

1 By letter dated July 24, 2025, the NRC issued Amendment No. 275, reflecting Palisades Energy, LLC, as the licensed operator for Palisades Nuclear Plant.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-20 is hereby amended to read as follows:
 - (2) The Technical Specifications contained in Appendix A, as revised through Amendment No. 277, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Palisades Energy shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
3. This license amendment is effective upon the licensee's submittal of a request to rescind the 10 CFR 50.82(a)(1) certifications and shall be implemented within 30 days from the amendment effective date.

FOR THE NUCLEAR REGULATORY COMMISSION

Ilka Berrios, Acting Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License and
Technical Specifications

Date of Issuance: July 24, 2025

ATTACHMENT TO LICENSE AMENDMENT NO. 277

PALISADES NUCLEAR PLANT

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Renewed Facility Operating License No. DPR-20

Replace the following page of Renewed Facility Operating License No. DPR-20 with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating areas of change.

REMOVE
Page 3

INSERT
Page 3

Technical Specifications

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE
TS Title Page
Page 1.1-1
Pages 5.0-1 through 5.0-5

INSERT
TS Title Page
Page 1.1-1
Pages 5.0-1 through 5.0-5

- (2) Palisades Energy, pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use source and special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Updated Final Safety Analysis Report, as supplemented and amended;
 - (3) Palisades Energy, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use byproduct, source, and special nuclear material as sealed sources for reactor startup, reactor instrumentation, radiation monitoring equipment calibration, and fission detectors in amounts as required;
 - (4) Palisades Energy, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material for sample analysis or instrument calibration, or associated with radioactive apparatus or components; and
 - (5) Palisades Energy, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operations of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Palisades Energy is authorized to operate the facility at steady-state reactor core power levels not in excess of 2565.4 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.
 - (2) The Technical Specifications contained in Appendix A, as revised through Amendment No. 277, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Palisades Energy shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - (3) Fire Protection

Palisades Energy shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the license amendment requests dated December 12, 2012, November 1, 2017, November 1, 2018, and March 8, 2019, as supplemented by letters dated February 21, 2013, September 30, 2013, October 24, 2013, December 2, 2013, April 2, 2014, May 7, 2014, June 17, 2014, August 14, 2014, November 4, 2014, December 18, 2014, January 24, 2018, and May 28, 2019, as approved in the safety evaluations dated February 27, 2015, February 27, 2018, and August 20, 2019. Except where NRC approval for changes or

PALISADES PLANT
RENEWED FACILITY OPERATING LICENSE DPR-20

APPENDIX A

**PERMANENTLY DEFUELED
TECHNICAL SPECIFICATIONS**

As Amended through Amendment No. 277

1.0 USE AND APPLICATION

1.1 Definitions

-----NOTE-----

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

<u>Term</u>	<u>Definition</u>
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- | | | |
|-------|--|--|
| 5.1.1 | The plant manager shall be responsible for overall plant operation and shall delegate in writing the succession for this responsibility during absences. | |
| | The plant manager or designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety. | |
| 5.1.2 | The shift manager shall be responsible for the control room command function. During any absence of the shift manager from the control room while the plant is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the shift manager from the control room while the plant is in MODE 5 or 6 an individual with an active SRO license or Reactor Operator (RO) license shall be designated to assume the control room command function. | |
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5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the Palisades plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented, and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key positions, or in equivalent forms of documentation. These requirements and the plant specific equivalent of those titles referred to in these Technical Specifications shall be documented in the FSAR.
- b. The plant manager shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressure.

5.2.2 Plant Staff

The plant staff organization shall include the following:

- a. A non-licensed operator shall be assigned when fuel is in the reactor and an additional non-licensed operator shall be assigned when the reactor is operating in MODES 1, 2, 3, or 4.
- b. (Deleted)

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.2 Plant Staff (Continued)

- c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i), and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the requirements.
 - d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
 - e. (Not Used)
 - f. The operations manager or an assistant operations manager shall hold an SRO license. The individual holding the SRO license shall be responsible for directing the activities of the licensed operators.
 - g. When in MODES 1, 2, 3, or 4 an individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operations of the plant. This individual shall meet the qualifications specified by ANSI/ANS 3.1-1993 as endorsed by RG 1.8, Rev. 3, 2000.
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5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

- | | | |
|-------|---|--|
| 5.3.1 | Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM). | |
| 5.3.2 | (Deleted) | |
| 5.3.3 | (Deleted) | |
| 5.3.4 | (Deleted) | |
| 5.3.5 | For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m). | |
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5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

- 5.4.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. |
 - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33; |
 - c. Not used;
 - d. All programs specified in Specification 5.5.
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 277 TO

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

HOLTEC PALISADES, LLC

PALISADES ENERGY, LLC

PALISADES NUCLEAR PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By application dated February 9, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24040A089), as supplemented by letter dated July 31, 2024 (ML24213A082), Holtec Decommissioning International, LLC (HDI), on behalf of Holtec Palisades, LLC2 (collectively, Holtec), submitted a license amendment request to make certain changes to the Renewed Facility Operating License (RFOL) DPR-20 for the Palisades Nuclear Plant (PNP). Specifically, Holtec requested an amendment to revise selected sections of the Permanently Defueled Technical Specifications (PDTs)³ to reflect the reauthorization of power operations at PNP.

The supplement dated July 31, 2024, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on August 7, 2024 (89 FR 64486).

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- 2 By letter dated July 24, 2025, the NRC issued Amendment No. 275, reflecting Palisades Energy, LLC, as the licensed operator. Holtec Palisades, LLC, remains the licensed owner of PNP.
 - 3 Holtec submitted two separate license amendment requests (LARs) that would revise the PNP RFOL and PDTs. The LAR that is the subject of this safety evaluation (SE), in part, proposes to reinstate certain TS administrative controls, such as staffing and training requirements (ML24040A089) into the PNP license previously in effect at PNP. The second LAR proposes to reinstate the applicable TS technical requirements (ML23348A148) into the PNP license, and is evaluated in a separate SE. Holtec elected to submit two LARs to retain a clear connection between these LARs and the previously-approved license amendments requests to transition the PNP license to a decommissioning status (ML17208A428 and ML21152A108, respectively).

1.1 Background Related to Holtec's Requests to Reauthorize Power Operations at Palisades

By letter dated January 4, 2017 (ML17004A062), pursuant to Paragraph (a)(1)(i) of Section 50.82, "Termination of license," of Title 10 of the Code of *Federal Regulations* (10 CFR), Entergy Nuclear Operations, Inc. (Entergy), the previous licensee for PNP, certified to the NRC that it decided to permanently cease power operations at PNP by October 1, 2018. By letters dated September 28, 2017 (ML17271A233), and October 19, 2017 (ML17292A032), Entergy updated its timeline and certified to the NRC that it planned to permanently cease power operations at PNP no later than May 31, 2022. By application dated December 23, 2020 (ML20358A075), as supplemented, Entergy on behalf of itself, Entergy Nuclear Palisades, LLC, Holtec International, and HDI submitted a license transfer application to transfer the PNP license from Entergy to Holtec. By letter dated December 13, 2021 (ML21292A145), the NRC issued an order consenting to the license transfer.

On May 20, 2022, PNP permanently ceased power operations. Pursuant to 10 CFR 50.82(a)(1)(ii), by letter dated June 13, 2022 (ML22164A067), Entergy certified to the NRC that all fuel had been permanently removed from the PNP reactor vessel and placed in the spent fuel pool (SFP) on June 10, 2022. These certifications were docketed by the NRC. Upon docketing the 10 CFR 50.82(a)(1) certifications, 10 CFR 50.82(a)(2) no longer authorizes operation of the reactor, or emplacement or retention of fuel into the reactor vessel. Shortly after PNP transitioned to a permanently shutdown and defueled facility in accordance with 10 CFR 50.82(a)(2), Holtec Palisades, LLC assumed ownership of PNP, and HDI became the licensed operator for decommissioning PNP (ML22173A173) and began the decommissioning process.

In early 2023, HDI engaged with the NRC staff regarding the potential restart of reactor operation at PNP. By letter dated March 13, 2023 (ML23072A404), HDI submitted its proposed regulatory path to resume power operations at PNP through a series of licensing and regulatory actions to restore the plant's licensing basis to the one in effect just prior to permanent shutdown.

Specifically, from September 2023 to May 2024, the NRC received the following licensing and regulatory requests related to the potential restart of Palisades:

- A September 28, 2023, request for an exemption "from the 10 CFR 50.82(a)(2) restriction that prohibits reactor power operations and retention of fuel in the reactor vessel ... by allowing for a one-time rescission of the docketed 10 CFR 50.82(a)(1) certifications." (ML23271A140) (Exemption Request).
- A December 6, 2023, license transfer application, seeking NRC consent to, and a conforming amendment for, a transfer of operating authority from HDI to Palisades Energy, LLC under Renewed Facility Operating License No. DPR-20 for Palisades and the general license for the Palisades Independent Spent Fuel Storage Installation (ISFSI) (ML23340A161) (License Transfer Application).
- A December 14, 2023, license amendment request in support of resuming power operations that largely seeks to undo the changes made by the previously issued PDS Amendment with some proposed differences from the previous operating reactor TS (ML23348A148) (Power Operations TS Amendment).

- A February 9, 2024, license amendment request in support of resuming power operations that largely seeks to undo the changes made by the previously issued Defueled Administrative Controls Amendment with some proposed differences from the previous operating reactor TS (ML24040A089) (Administrative Controls Amendment).
- A May 1, 2024, license amendment request to revise the Palisades site emergency plan to support resuming power operations (ML24122C666) (Emergency Plan Amendment).
- A May 24, 2024, license amendment request to revise the Palisades main steam line break analysis to “support the Palisades restart project.” (ML24145A145) (MSLB Amendment).

While the changes requested in this LAR (Administrative Controls Amendment) are a necessary part of the Holtec’s regulatory approach to support reinstatement of the PNP power operations licensing basis, the NRC’s approval of the proposed changes in this LAR is not sufficient to authorize operation of the reactor, or emplacement or retention of fuel into the reactor vessel. NRC approval of all of the licensing and regulatory requests listed above is necessary to reauthorize power operations at PNP. This SE addresses only the staff’s review of the Administrative Controls Amendment. As discussed in Section 2.3 below, the other licensing and regulatory actions described above were reviewed separately by the NRC staff and are being issued concurrently with this amendment.

In February 2025, Holtec submitted two additional license amendment requests that Holtec states are necessary for the resumption of power operations at PNP. These amendments would revise certain technical specifications to support repairing of steam generator tubes by sleeving and revise PNP’s licensing basis to incorporate a leak-before-break methodology (ML25043A348 and ML25035A216, respectively). In June 2025, Holtec submitted an additional amendment to revise the schedule in their license condition for full implementation of the NFPA.805 fire protection modifications (ML25175A275). These amendments are still currently under NRC review.

1.2 Proposed Changes to the Permanently Defueled Technical Specifications

In the LAR, Holtec proposed changes to reinstate TS requirements in Section 5.0, “Administrative Controls” and Section 1.1, “Definitions,” to those that were in effect just prior to docketing the 10 CFR 50.82(a)(1) certifications, with some minor administrative changes. These proposed changes are evaluated in section 3.1 of this safety evaluation.

In License Amendment No. 266, dated June 4, 2018 (ML18114A410), the NRC approved changes to the Administrative Controls section of the PNP TS to revise certain staffing and training requirements, and make changes to reports and programs to reflect the permanently defueled status of the plant once it entered decommissioning. Amendment No. 266 became effective following the docketing of the 10 CFR 50.82(a)(1) certifications. The current LAR would effectively reverse the changes made by Amendment No. 266 and return the Administrative Controls section of the PNP TS to that in effect during plant operation.

2.0 REGULATORY EVALUATION

The regulatory requirements and guidance on which the NRC based its acceptance and evaluation of this LAR are contained in the following subsections.

2.1 Applicable Regulatory Requirements

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 applications.

Under 10 CFR 50.92(a), determinations on whether to grant a license amendment are to be guided by the considerations that govern the issuance of initial licenses or construction permits to the extent applicable and appropriate. Both the common standards for licenses and construction permits in 10 CFR 50.40(a) (regarding, among other things, consideration of the operating procedures, the facility and equipment, the use of the facility, and other technical specifications, or the proposals), and those specifically for issuance of operating licenses in 10 CFR 50.57(a)(3), provide that there must be "reasonable assurance" that the activities at issue will not endanger the health and safety of the public, and that the applicant will comply with the Commission's regulations.

Section 50.36, "Technical specifications," of 10 CFR establishes the regulatory requirements related to the content of TS. The five categories of items required to be in the TS are listed in 10 CFR 50.36(c) and include (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 under 10 CFR 50.54(m) establish the requirements for having Reactor Operators and Senior Reactor Operators (SROs) licensed in accordance with 10 CFR Part 55, "Operators' Licenses," based on plant conditions. Given the proposed reinstatement of PNP power operations technical specifications, the requirements of 10 CFR 50.54(m) are applicable.

2.2 Regulatory Guidance

The NRC staff's guidance for the review of operational TS is contained in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition" (SRP), Chapter 16.0, "Technical Specifications," Revision 3, dated March 2010 (ML100351425). As described therein, as part of a regulatory standardization effort, the NRC staff has prepared standardized technical specifications (STS) for each of the LWR nuclear designs. Accordingly, the NRC staff's review of the current LAR includes consideration of whether the proposed changes for PNP are consistent with the applicable reference STS. The STS applicable to PNP is NUREG-1432, Revision 5.0, "Standard Technical Specifications, Combustion Engineering Plants," Volume 1, "Specifications," and Volume 2, "Bases," dated September 2021 (ML21258A421 and ML21258A424, respectively).

2.3 NRC Staff's Consideration of the Licensing and Regulatory Requests Related to the Reauthorization of Power Operations at PNP

The NRC staff's consideration of all restart-related requests is governed by Commission-established policy on the reauthorization of reactor operations for plants in decommissioning. In denying a petition for rulemaking, Criteria to Return Retired Nuclear Power Reactors to Operations, (86 FR 24362; May 6, 2021), the Commission stated that "the NRC may consider requests from licensees to resume operations under the existing regulatory framework." . Further, the Commission stated that, "[i]f the NRC receives a request from the licensee for a decommissioning reactor to resume operations, the NRC would review the request consistent

with applicable regulatory requirements. This review would include consideration of relevant safety standards to assure adequate protection of public health and safety.” In addition, in a decision related to the License Transfer Application, the Commission reaffirmed its policy that the NRC may consider licensee requests to resume operations under the existing regulatory framework (ML25119A109).

As discussed in Section 2.3 of the NRC staff’s SE approving the Power Operations TS Amendment, the staff has concluded that a licensee in decommissioning may seek the restart of reactor operation by applying to use relevant processes within the existing regulatory framework, including the license amendment, license transfer, and exemption processes. Accordingly, separate from this SE, the NRC staff has reviewed and approved the Exemption Request (ML25163A182), the License Transfer Application (ML25167A245), the Power Operations TS Amendment (ML25157A127), the Emergency Plan Amendment (ML25150A281), and the MSLB Amendment (ML25156A045). The staff is issuing its approval of these actions concurrently with its approval of this LAR (Administrative Controls TS Amendment) to reauthorize power operations at PNP.

3.0 TECHNICAL EVALUATION

This SE section and associated subsections document the NRC staff evaluation of Holtec’s proposed changes in the LAR against the applicable regulations and guidance discussed in Section 2.0 of this SE. In LAR Enclosure Section 2.1, “Reason for Proposed Change,” Holtec explained that this LAR is needed to reinstate certain administrative controls requirements in the TS that were in effect just prior to the 10 CFR 50.82(a)(1) certifications to support returning PNP to a power operations licensing basis.

In LAR Enclosure Section 2.2, “Description of Proposed Change,” Holtec explained that the LAR proposes to revise PDTs Section 5.0, “Administrative Controls,” and Section 1.1, “Definitions,” consistent with previously approved PNP power operations technical specifications. The proposed changes would revise certain requirements in Section 5.0 to add staffing, organization, and procedure requirements that are necessary for power operation and revise or remove requirements that would no longer be applicable. Holtec states that the proposed changes to the PNP PDTs are in accordance with 10 CFR 50.36(c)(5).

According to Holtec, the shutdown of PNP was done for business and economic reasons and not because of the licensee’s safety concerns (see Section 7.6 of ML23271A140). PNP was also operating safely prior to its shutdown for decommissioning. The most recent operations phase PNP Annual Assessment Letter dated March 2, 2022 (ML22055B137), provides in part, the following assessment results:

The NRC concluded that overall performance at your facility preserved public health and safety. The baseline inspection program was completed at your facility as defined in Inspection Manual Chapter 2515, “Light-Water Reactor Inspection Program - Operations Phase.”

The NRC determined the performance at Palisades Nuclear Plant during the most recent quarter was within the Licensee Response Column, the highest performance category of the NRC’s Reactor Oversight Process (ROP) Action Matrix, because all inspection findings had very low safety significance (i.e., Green), and all PIs [performance indicators] were within the expected range (i.e., Green).

Informed by the discussion above, the NRC staff's review approach focused on evaluating whether Holtec's proposed amendment to the PNP PDTS to reinstate the PNP Operational Administrative Controls TS and Definitions TS that were in effect just prior to the docketing of the 10 CFR 50.82(a)(1) certifications, with select revisions primarily retaining editorial changes to the PNP PDTS, are consistent with the previous NRC-approved PNP Administrative Controls TS and Definitions TS, and acceptable to support power operations at Palisades.

3.1 Proposed Changes to the Administrative Controls and Definitions Permanently Defueled Technical Specifications

The staff's evaluation of the proposed changes is broken into the following sections:

(1) Section 1.1, "Definitions," (2) Section 5.1, "Responsibility," (3) Section 5.2, "Organization," (4) Section 5.3, "Plant Staff Qualifications," (5) Section 5.4, "Procedures," (6) Section 5.5, "Programs and Manuals," and (7) Section 5.7, "High Radiation Area."

Holtec's proposed changes to the PDTS Definitions and Administrative Controls sections are described in LAR Enclosure Section 3.1.1, "Proposed Changes to the Permanently Defueled Technical Specifications," and shown in attachments to the Enclosure: Attachment 1 (mark-up pages) and Attachment 2 (retyped pages). The LAR Enclosure Section 3.1.1 is arranged in a table format that identifies the TS section, summarizes the proposed changes, and provides a basis for the proposed changes. The NRC staff review of LAR Enclosure Section 3.1.1 and associated attachments is provided in the following subsections of this SE.

3.1.1 *TS Section 1.1, "Definitions"*

Holtec proposed to remove the definitions for "CERTIFIED FUEL HANDLER" and "NON-CERTIFIED OPERATOR" because they were not included in the previously approved power operations TS prior to Amendment No. 266. The deletion would reflect that these terms are related to the operating personnel of a permanently defueled plant that did not and will not have a role in the power operations of PNP. Therefore, these definitions are not necessary.

The NRC staff reviewed Holtec's proposed TS changes for TS Section 1.1 as shown in the attachments to the enclosure. Based on its review, the NRC staff finds that the proposed TS changes would restore the PNP TSs to those in effect prior to Amendment No. 266, including the deletion of TS that are only applicable to the decommissioning phase, and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS Section 1.1 meet 10 CFR 50.36(c), and are therefore acceptable for power operations at Palisades.

3.1.2 *TS Section 5.1, "Responsibility"*

Holtec proposed to reinstate TS 5.1.1 with minor revisions to that which was in effect prior to the docketing of the 10 CFR 50.82(a)(1) certifications. Holtec proposed to keep the term "plant manager" currently in the PDTS instead of reinstating the previous term "plant superintendent" used in the previous power operations TS since the terms are equivalent, and the term "plant manager" more closely represents the proposed future PNP operating organization. Holtec also proposed to retain the deletion of the term "his" from the terms "responsibility during his absence" and "or his designee" which was approved in Amendment No. 266. Holtec proposed to replace "facility operation" with "plant operation" to clearly differentiate between a facility with a reactor that is permanently defueled and a plant that is licensed for power operation. Holtec also proposed to replace "safe storage and maintenance of spent nuclear fuel" with "nuclear

safety” to more precisely describe that, for a plant in power operation condition, nuclear safety will focus across a broad spectrum of attributes to ensure safe operation of PNP. Both of these changes return this language to that contained in the power operations TS in effect before the plant docketed the 10 CFR 50.82(a)(1) certifications.

The NRC staff reviewed Holtec’s proposed changes to TS 5.1.1 described in the corresponding LAR section, as supplemented by letter dated July 31, 2024, and shown in the attachments to the enclosures of both documents. Based on its review, the NRC staff finds that the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266, retain select previously approved editorial revisions to the PDTS at PNP that do not affect the TS requirements for operations, and are necessary to support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS Section 5.1.1 meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

Holtec proposed to reinstate TS 5.1.2 with minor revisions to that which was in effect prior to the 10 CFR 50.82(a)(1) certifications. Holtec proposed to keep the term “shift manager” instead of changing it back to “shift supervisor (SS)” as the terms are equivalent and “shift manager” more closely represents the proposed future PNP operating organization.

The NRC staff reviewed Holtec’s proposed changes to TS 5.1.2 described in the corresponding LAR section and shown in the attachments to the enclosure. Based on its review, the NRC staff finds that the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266, retain select previously approved editorial revisions to the PDTS at PNP that do not affect the TS requirements for operations, and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS Section 5.1.2 meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

3.1.3 TS Section 5.2, “Organization”

TS 5.2.1

Holtec proposed to reinstate TS 5.2.1 and TS 5.2.1.a in their entirety to that which was in effect prior to the docketing of the 10 CFR 50.82(a)(1) certifications.

The NRC staff reviewed Holtec’s proposed changes to TS 5.2.1 and 5.2.1.a described in the corresponding LAR section and shown in the attachments to the enclosure. Based on its review, the NRC staff finds that the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266 and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS Section 5.2.1 and TS Section 5.2.1.a meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

Holtec proposed to reinstate TS 5.2.1.b, TS 5.2.1.c, and TS 5.2.1.d with minor revisions to that which was in effect prior to the docketing of the 10 CFR 50.82(a)(1) certifications. For TS 5.2.1.b, Holtec proposed to keep the term “plant manager” currently in the PDTS instead of reinstating the previous term “plant superintendent” used in the previous power operations TS since the terms are equivalent, and the term “plant manager” more closely represents the proposed future PNP operating organization. For TS 5.2.1.c, Holtec proposed to keep the term “corporate officer” currently in the PDTS instead of reinstating the previous term “corporate

executive” used in the previous power operations TS as the terms are equivalent and independent of plant operating status. For TS 5.2.1.d, Holtec proposed to keep the term “radiation protection” currently in the PDTS instead of reinstating the previous term “radiation safety” used in the previous power operations TS as the terms are equivalent and independent of facility operating status.

The NRC staff reviewed Holtec’s proposed changes to TS 5.2.1.b, TS 5.2.1.c, and TS 5.2.1.d described in the corresponding LAR section and shown in the attachments to the enclosure. Based on its review, the NRC staff finds that the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266, retain select previously approved editorial revisions to the PDTS at PNP that do not affect the TS requirements for operations, and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS Section 5.2.1.b, TS Section 5.2.1.c, and TS Section 5.2.1.d meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

TS 5.2.2

Holtec proposed to reinstate TS 5.2.2.a, TS 5.2.2.c, TS 5.2.2.f, and TS 5.2.2.g in their entirety to that which was in effect prior to the docketing of the 10 CFR 50.82(a)(1) certifications. Holtec also proposed to delete TS 5.2.2.b and TS 5.2.2.e in their entirety because these TS were not in effect prior to the 10 CFR 50.82(a)(1) certifications. TS 5.2.2.b and TS 5.2.2.e establish requirements for certified fuel handlers, which is a position specific to operating personnel for a permanently defueled plant that did not and will not have a role in the power operations of PNP. Therefore, these TS requirements are not necessary to support power operations at PNP.

The NRC staff reviewed Holtec’s proposed changes to TS 5.2.2.a, TS 5.2.2.b, TS 5.2.2.c, TS 5.2.2.e, TS 5.2.2.f, and TS 5.2.2.g described in the corresponding LAR section, as supplemented by letter dated July 31, 2024, and shown in the attachments to the enclosures of both documents. Based on its review, the NRC staff finds that the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266, including the deletion of TS that are only applicable to the decommissioning phase, and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS 5.2.2.a, TS 5.2.2.b, TS 5.2.2.c, TS 5.2.2.e, TS 5.2.2.f, and TS 5.2.2.g meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

Holtec proposed to reinstate TS 5.2.2 and TS 5.2.2.d with minor revisions to that which was in effect prior to the docketing of the 10 CFR 50.82(a)(1) certifications, including revising the title of TS 5.2.2 from “Facility Staff” to “Plant Staff.” Holtec proposed to retain the introductory text that was added by Amendment No. 266, with minor revision, from “The facility staff organization shall include the following:,” to “The plant staff organization shall include the following:,”. Holtec also proposed to revise TS 5.2.2.d from “A radiation protection technician shall be on site during the movement of fuel and during the movement of loads over fuel.” to “A radiation protection technician shall be on site when fuel is in the reactor.” These changes are consistent with language to reflect that PNP will be in an operational status, and align with the language in the previous operating TS for PNP.

The NRC staff reviewed Holtec’s proposed changes to TS 5.2.2 and TS 5.2.2.d described in the corresponding LAR section, as supplemented by letter dated July 31, 2024, and shown in the attachments to the enclosures of both documents. Based on its review, the NRC staff finds that

the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266, retain select previously approved editorial revisions to the PDTs at PNP that do not affect the TS requirements for operations, and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS Section 5.2.2 and TS Section 5.2.2.d meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

3.1.4 TS Section 5.3, *“Plant Staff Qualifications”*

Holtec proposed to reinstate TS 5.3.1 with minor revision and TS 5.3.5 in its entirety to that which was in effect prior to the docketing of the 10 CFR 50.82(a)(1) certifications, including changing the title from “Facility Staff Qualifications” back to “Plant Staff Qualifications.” Holtec proposed to keep the deletion of the word “Entergy” in TS 5.3.1 that was located prior to the term “Quality Assurance Program Manual (QAPM),” which was removed in Amendment No. 266 to allow PNP to transition to a site-specific QAPM. Holtec also proposed to delete TS 5.3.2 in its entirety because it was not in effect prior to the 10 CFR 50.82(a)(1) certifications. TS 5.3.2 establishes requirements for certified fuel handlers, which is a position specific to operating personnel for a permanently defueled plant that did not and will not have a role in the power operations of PNP. Therefore, this TS requirement is not necessary to support power operation.

The NRC staff reviewed Holtec’s proposed changes to TS 5.3.1, TS 5.3.2, and TS 5.3.5 described in the corresponding LAR section, as supplemented by letter dated July 31, 2024, and shown in the attachments to the enclosures of both documents. Based on its review, the NRC staff finds that the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266, including the deletion of TS that are only applicable to the decommissioning phase, retain select previously approved editorial revisions to the PDTs at PNP that do not affect the TS requirements for operations, and support the resumption of power operations at PNP. Further, a site-specific QAPM is acceptable for power operations at Palisades, and therefore the proposal to retain the deletion of “Entergy” or the equivalent term to remove the reference to a corporate QAPM is acceptable. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS 5.3.1, TS 5.3.2, and TS 5.3.5 meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

3.1.5 TS Section 5.4, *“Procedures”*

Holtec proposed to reinstate TS 5.4.1.a and TS 5.4.1.b in their entirety to that which was in effect prior to the docketing of the 10 CFR 50.82(a)(1) certifications.

The NRC staff reviewed Holtec’s proposed changes to TS 5.4.1.a and TS 5.4.1.b described in the corresponding LAR section, as supplemented by letter dated July 31, 2024, and shown in the attachments to the enclosures of both documents. Based on its review, the NRC staff finds that the proposed PNP TS are consistent with the previous NRC-approved operational TS that were in effect just prior to the issuance of Amendment No. 266 and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the proposed changes to PNP TS Section 5.4.1.a and TS Section 5.4.1.b meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

3.1.6 *TS Section 5.5, "Programs and Manuals"*

Holtec did not propose to revise TS 5.5. Instead, Holtec proposed to retain the Amendment No. 266 changes to TS 5.5.1.c.2 and TS 5.5.15.b.2 to keep the term "plant manager" instead of "plant superintendent" and "shift manager" instead of "shift supervisor."

The NRC staff reviewed the basis Holtec provided that the current TS 5.5, after being revised by Amendment 266, supports power operations as described in the supplemental letter dated July 31, 2024. Based on its review, the NRC staff finds that the current PNP TS contain previously approved editorial revisions to the PDTS at PNP that do not affect the TS requirements for operations, and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the current PNP TS Section 5.5 meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

3.1.7 *TS Section 5.7, "High Radiation Area"*

Holtec did not propose to revise TS 5.7. Instead, Holtec proposed to retain the Amendment No. 266 change to TS 5.7.2.a.1 to keep the term "shift manager" instead of "shift supervisor."

The NRC staff reviewed the basis Holtec provided that the current TS 5.7, after being revised by Amendment 266, supports power operations as described in the supplemental letter dated July 31, 2024. Based on its review, the NRC staff finds that the current PNP TS, contain a previously approved editorial revision to the PDTS at PNP that do not affect the TS requirements for operations and support the resumption of power operations at PNP. Based on these findings, the NRC staff concludes that the current PNP TS Section 5.7 meet 10 CFR 50.36(c)(5), and are therefore acceptable for power operations at Palisades.

3.2 Technical Conclusion

Based on the considerations discussed in Section 3 of this SE, the NRC staff concludes that the proposed changes to reinstate the PNP Administrative Controls TS, are acceptable because they are consistent with the previous NRC-approved PNP operational TS that were in effect at PNP just prior to the docketing of the 10 CFR 50.82(a)(1) certifications which triggered implementation of Amendment No. 266 and, other than the editorial and administrative changes noted in the SE, are necessary to support the resumption of power operations at PNP.

As described in Section 2.3 of this SE, concurrent with the issuance of this amendment, the NRC staff is issuing its approval of the Exemption Request (ML25163A182) to allow for a one-time rescission of the PNP docketed 10 CFR 50.82(a)(1) certifications to remove the restriction that prohibits operation of the PNP reactor and emplacement and retention of fuel into the PNP reactor vessel. As such, this license amendment is effective upon the licensee's submittal of a request to rescind the 10 CFR 50.82(a)(1) certifications.

Accordingly, the NRC staff finds that the proposed changes meet the applicable NRC regulatory requirements and provide reasonable assurance that the changes will be protective of public health and safety, the environment, and the common defense and security. Therefore, the approval of this LAR will continue to ensure that the PNP licensing basis is adequate to safely support the plant as it transitions to operation.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The NRC staff's proposed no significant hazards consideration determination was published in the *Federal Register* on August 7, 2024 (89 FR 64486). On October 7, 2024, the NRC received two initial hearing requests on this LAR from: 1) Mr. Alan Blind on behalf of himself and Bruce Davis, Karen Davis, Jody Flynn, Thomas Flynn, Christian Moevs, Dianne Ebert, Mary Huffman, and Chuck Huffman, filed on September 9, 2024; and 2) Beyond Nuclear, Don't Waste Michigan, Michigan Safe Energy Future, Three Mile Island Alert, and Nuclear Energy Information Service (collectively, Petitioning Organizations). On March 3, 2025, the Petitioning Organizations filed a motion for leave to file new and amended contentions based on the publication of the Draft Environmental Assessment and Finding of No Significant Impact. On March 31, 2025 (ML25090A164), the Atomic Safety and Licensing Board (the Board) issued a Memorandum and Order denying both initial hearing requests. On April 25, 2025 (ML25115A265), the Petitioning Organizations appealed the Board's decision on their initial hearing request. On June 20, 2025 (ML25171A153), the Board issued an order denying the Petitioners Organization's motion for leave to file new and amended contentions. On July 15, 2025 (ML25196A132), the Petitioning Organizations appealed the Board's decision on the new and amended contentions. Both appeals are pending before the Commission. No public comments were received on the proposed no significant hazards consideration determination for this amendment.

Under the Atomic Energy Act of 1954, as amended, and the NRC's regulations, the NRC staff may issue and make an amendment immediately effective, notwithstanding the pendency before the Commission of a request for a hearing from any person, in advance of the holding and completion of any required hearing, where it has made a final determination that no significant hazards consideration is involved.

The NRC's regulation in 10 CFR 50.92(c) states that the NRC may make a final determination, under the procedures in 10 CFR 50.91, that a license amendment involves no significant hazards consideration if operation of the facility, in accordance with the amendment, would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

As required by 10 CFR 50.91(a), Holtec provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes would revise the PNP PDTs by deleting definitions in PDTs Section 1.0, applicable to a facility in decommissioning, and reinstating, deleting, and modifying some administrative controls in PDTs Section 5.0, to correspond to those that are applicable to a power operations reactor.

The deletion of TS definitions that are not applicable in a power operation condition has no impact on facility structures, systems, and components (SSCs) or the methods of operation of such SSCs. Therefore, they do not involve an increase in the probability or consequences of a previously evaluated accident.

Additionally, certain portions of the administrative control sections are deleted, reinstated, or modified to reflect a power operation plant. Chapter 14 of the PNP Updated Final Safety Analysis Report (UFSAR) Revision 35 (ADAMS Accession No. ML21125A285) describes the postulated design basis accidents (DBA) and transient scenarios applicable to PNP during power operations. The UFSAR will be reinstated to reflect the docketed version (Revision 35) that was in effect prior to docketing the 10 CFR 50.82(a) certifications of permanent cessation of power operations and permanent removal of fuel at PNP. This will include restoration of the UFSAR Revision 35 which includes previously evaluated accident analyses and safety classification of SSCs to support power operations at PNP. The proposed deletion, reinstatement, and modification of provisions of the administrative controls do not directly affect the design of SSCs necessary for safe operation of PNP. The proposed changes to the administrative controls are administrative in nature and do not affect any accidents or transients described in Chapter 14 of the PNP UFSAR Revision 35. The proposed changes do not involve physical changes to the facility or in the procedures governing operation of the plant that were in effect prior to 10 CFR 50.82(a)(1) certifications.

The probability of occurrence of previously evaluated accidents is not increased because changes to these administrative controls do not impact power operation or the response to an accident or transient. Thus, the probability or consequences of an accident previously evaluated are not increased.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes to the PNP PDTs do not impact the function of plant structures, systems, or components. The proposed changes do not involve installation of new equipment or modification of existing equipment that could create the possibility of a new or different kind of accident. The reinstatement, deletion, and modification of administrative PDTs that are related only to administrative staffing and procedures during the operation of the nuclear reactor cannot result in different or more adverse failure modes or accidents than previously evaluated because the plant will be operated within regulations and the previously approved licensing basis. Hence, the proposed changes do not result in a change to the way the facility or equipment is operated in a manner which could cause a new or different kind of accident initiator to be created.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed PDTS changes are limited to those portions of the PDTS that are not related to the systems, structures and components that are important to the safe operation of the plant. The requirements that are proposed to be reinstated, revised, or deleted from the PNP PDTS are not credited in the existing accident analysis for postulated accidents, and as such, do not contribute to the margin of safety associated with the accident analysis. No accident analyses or safety analyses acceptance criteria will be affected by the proposed changes.

Therefore, the proposed amendment does not involve a significant reduction in the margin of safety.

The NRC staff reviewed Holtec's no significant hazards consideration determination. Based on this review and the staff's evaluation of the underlying LAR as discussed above, the NRC staff concludes that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff has made a final determination that no significant hazards consideration is involved for the proposed amendment and that the amendment should be issued as allowed by the criteria contained in 10 CFR 50.91.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment on June 3, 2025. The State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

In accordance with 10 CFR 51.30, 10 CFR 51.31, and 10 CFR 51.32, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment, as discussed in the NRC staff's environmental assessment and finding of no significant impact, issued on May 30, 2025 (90 FR 23071).

7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Andrea Russell, NRR/STSB

Date of Issuance: July 24, 2025

SUBJECT: PALISADES NUCLEAR PLANT - ISSUANCE OF AMENDMENT NO. 277 RE:
AMENDMENT REQUEST TO REVISE SELECTED PERMANENTLY
DEFUELED TECHNICAL SPECIFICATIONS ADMINISTRATIVE CONTROLS
TO SUPPORT RESUMPTION OF POWER OPERATIONS
(EPID(EPID L-2024-LLA-0013) DATED JULY 24, 2025

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