From: <u>Justin Poole</u>
To: <u>Michael Schultheis</u>

Cc: <u>Johann Britting</u>; <u>Amy Filbrandt</u>; <u>Ilka Berrios</u>; <u>Brent Ballard</u>; <u>Marlayna Doell</u>

Subject: Palisades Nuclear Plant – Acceptance of Requested Licensing Action Re: Amendment Request to Change Full

Compliance Implementation Date for NFPA-805 Modifications (EPID L-2025-LLA-0097)

**Date:** Friday, June 27, 2025 12:54:00 PM

Mike,

By letter dated June 24, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25175A275), Holtec submitted a license amendment request for Palisades Nuclear Plant. The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine whether the application contains sufficient technical information to allow the NRC staff to complete a detailed technical review. The acceptance review is also intended to identify any readily apparent deficiencies related to the characterization of the regulatory requirements or plant licensing basis.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it includes technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the more limited scope and depth of the acceptance review compared to the detailed technical review, issues that affect the NRC staff's ability to complete the technical review may still be identified despite the acceptance review being deemed adequate. If additional information is needed, you will be notified by separate correspondence.

Although there is limited precedent for similar reviews across the operating fleet, the NRC staff did review a previous instance where Palisades had made this same request, and it took NRC staff 50 hours and 4 months to complete. To support a more efficient process, the NRC is setting a goal of achieving a 15% improvement. Based on that, NRC staff is estimating this review to take 40 hours and the expects to complete the review by your requested date of October 24, 2025.

If emergent complexities or challenges arise during the NRC staff's review that affect the initial forecasted completion date or result in significant changes to the estimated review hours, the reasons for those changes—along with updated estimates—will be communicated during routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and may change due to several factors, including requests for additional information, unanticipated expansion of the review scope, hearing-related activities, or if the submittal is provided to the NRC in advance of or concurrently with industry program initiatives or pilot applications.

## If you have any questions, please contact me.

Justin C. Poole
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