



PNP 2025-051

10 CFR 50.90
10 CFR 50.54(q)

July 11, 2025

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-001

Palisades Nuclear Plant
Docket Nos. 50-255 and 72-007
Renewed Facility Operating License No. DPR-20

Subject: Acknowledgement of Proposed License Condition re: License Amendment
Request to Revise the Palisades Nuclear Plant Site Emergency Plan to Support
Resumption of Power Operations

On May 1, 2024, Holtec¹ submitted a License Amendment Request (LAR) to revise the Palisades Nuclear Plant (PNP) Site Emergency Plan to support the resumption of power operations at PNP (Reference 1). The proposed LAR would revise the PNP Site Emergency Plan and emergency classification scheme to reflect the resumption of power operations at PNP. The LAR remains under review as of the date of this letter.

The proposed PNP Site Emergency Plan and U.S. Nuclear Regulatory Commission (NRC) regulations in paragraph IV.F.2 of Appendix E to 10 CFR Part 50 require, among other things, that prior to resuming full power operations, Holtec must perform a "full participation" emergency preparedness exercise "which tests as much of the licensee, State, and local emergency plans as is reasonably achievable." Holtec expects to conduct such a full participation exercise in July 2025, which may be after the NRC issues its approval for the LAR. Accordingly, Holtec acknowledges and consents to the NRC's plan to add the following as a new License Condition to the Palisades Renewed Facility Operating License to ensure that the full participation emergency preparedness exercise is completed prior to the resumption of full power operations:

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 (Reference 2), licensed operating 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.

The licensee is authorized to load fuel and perform low power testing, but may not exceed 5 percent of rated thermal power until, following the conduct of the exercise required by paragraph IV.F.2 of Appendix E to 10 CFR Part 50, the NRC notifies the licensee that FEMA: (1) has not identified any deficiencies in the state of offsite emergency preparedness; or (2) has informed the NRC that any offsite deficiencies have been corrected.

Holtec confirms its position that the addition of this license condition does not change the findings contained in the NRC's Environmental Assessment and Finding of No Significant Impact for the PNP restart project (Reference 3).

This letter contains no new commitments and no revised commitments.

If you have any questions regarding this submittal, please contact Frank Sienczak, Regulatory Assurance Manager, at (269) 764-2263.

Sincerely,

Jean A. Fleming
Vice President of Licensing and Regulatory Affairs
Holtec International

References:

1. Holtec Decommissioning International, LLC (HDI) letter to U.S. Nuclear Regulatory Commission (NRC), *License Amendment Request to Revise the Palisades Nuclear Plant Site Emergency Plan to Support Resumption of Power Operations*, dated May 1, 2024 (ADAMS Accession No. ML24122C666)
2. HDI letter to NRC, *Application for Order Consenting to Transfer of Control of License and Approving Conforming License Amendments*, dated December 6, 2023 (ADAMS Accession No. ML23340A161)
3. NRC, *Environmental Assessment and Finding of No Significant Impact for the Palisades Nuclear Plant Reauthorization of Power Operations Project; Final Environmental Assessment and Finding of No Significant Impact*, issued May 2025 (ADAMS Accession No. ML25111A031)

cc:

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