

From: [Alan Blind](#)
To: [Petition Resource](#)
Cc: [PalisadesRestartProject](#)
Subject: [External_Sender] Supplemental Filing to May 2025 10 CFR 2.206 Petition – Omission of Tendon 388F from Required Containment Inspection
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Subject: Supplemental Filing to May 2025 10 CFR 2.206 Petition – Omission of Tendon 388F from Required Containment Inspection

Dear NRC Petition Review Board,

I respectfully request that the following supplemental information be added to the record of my May 2025 petition submitted pursuant to 10 CFR § 2.206, titled “*Request for NRC Enforcement Action Regarding Omission of Tendon 388F from the 2025 Palisades Containment Tendon Surveillance Inspection.*”

In that petition, I presented evidence that Holtec Decommissioning International, LLC failed to include tendon 388F—an NRC-flagged, non-homologous tendon uniquely replaced during the 1990–1991 Steam Generator Replacement Project—in its 2025 50-Year Containment Tendon Surveillance Inspection Summary Report (ML25062A010). The petition further demonstrated that Holtec submitted this report under the proposed Technical Specifications (TS 5.5.5 and 5.6.7), which govern containment structural integrity and associated surveillance documentation. I asked the NRC to require Holtec to inspect tendon 388F and incorporate it into the surveillance program prior to authorizing any return to operation.

I now submit this critical supplemental development:

“A final no significant hazards consideration determination and license amendment approving changes to the operating license and technical specifications to support the reauthorization of power operations at Palisades Nuclear Plant (Palisades) will be issued on or about July 24, 2025.”
— NRC Notification of Significant Licensing Action, July 17, 2025 (ADAMS Accession No. ML25188A013)E250717t143054_Palisade...

This action confirms that Holtec’s previously “proposed” Technical Specifications—including TS 5.5.5, TS 5.6.7, and SR 3.6.1.2—are now formally approved and fully enforceable. Consequently, Holtec's tendon surveillance report, submitted on March 3, 2025, must now be evaluated for **full compliance** with these provisions as a condition of reactor containment operability and NRC authorization to re-enter Mode 4.

As documented in my petition:

- **Tendon 388F has a unique replacement history** acknowledged by the NRC, including a new tendon installed in 1991 with materials and stress history not shared by the rest of the population.
- The tendon surveillance sampling methodology used by Holtec **did not include tendon 388F**, nor did it disclose or justify this exclusion in the 2025 report.
- Holtec explicitly stated in its submission (ML25062A010) that the report was filed **in accordance with Technical Specification 5.6.7** and was part of its regulatory compliance for return to service.

With the NRC’s final approval of Holtec’s TS and Operating License Amendment now in effect, **the omission of tendon 388F from the surveillance report is no longer a hypothetical oversight under proposed requirements—it is now a matter of enforceable regulatory noncompliance.**

In summary, I respectfully request the Petition Review Board to:

1. Incorporate this new licensing development into the record of my 10 CFR § 2.206 petition;
2. Recognize that the omission of tendon 388F from Holtec’s surveillance program now constitutes a **failure to comply** with approved Technical Specifications TS 5.5.5, TS 5.6.7, and SR 3.6.1.2;

3. Require Holtec to perform inspection and analysis of tendon 388F prior to NRC acceptance of the 2025 tendon surveillance report or authorization of Palisades' entry into Mode 4.

Thank you for your attention to this serious structural integrity concern and the implications it holds for the safety basis of containment operability.

Sincerely,

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