



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

November 20, 2025

Site Vice President
Palisades Energy, LLC
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT - ISSUANCE OF AMENDMENT NO. 282
REGARDING A CHANGE TO THE FULL COMPLIANCE IMPLEMENTATION
DATE FOR THE FIRE PROTECTION PROGRAM (EPID L-2025-LLA-0097)

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 282 to Renewed Facility Operating License No. DPR-20 for the Palisades Nuclear Plant. The amendment consists of changes to the license in response to your application dated June 24, 2025, as supplemented by letter dated September 30, 2025.

The amendment extends the full compliance date for the fire protection program transition license condition.

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. 282 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. 282
Renewed 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, LLC and Holtec Palisades, LLC,¹ dated June 24, 2025, as supplemented by letter dated September 30, 2025, 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;
 - 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 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 (the licensee) for Palisades Nuclear Plant.

2. Accordingly, the license is amended by changes as indicated in the attachment to the license amendment, and Paragraphs 2.C.(3) and 2.C.(3)(c)2 of Renewed Facility Operating License No. DPR-20 are hereby amended to read as follows:

2.C.(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, March 8, 2019, and June 24, 2025, 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, May 28, 2019, and September 30, 2025, as approved in the safety evaluations dated February 27, 2015, February 27, 2018, August 20, 2019, and November 20, 2025. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

2.C.(3)(c) Transition License Condition

2. The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of Entergy Nuclear Operations, Inc. (ENO), letter PNP 2019-028 dated May 28, 2019, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the refueling outage following the fifth full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days of the date of issuance.

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 No. DPR-20

Date of Issuance: November 20, 2025

ATTACHMENT TO LICENSE AMENDMENT NO. 282

PALISADES NUCLEAR PLANT

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Renewed Facility Operating License No. DPR-20

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

REMOVE

3

6

INSERT

3

6

- (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. 281, 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, March 8, 2019, and June 24, 2025, 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, May 28, 2019, and September 30, 2025, as approved in the safety evaluations dated February 27, 2015, February 27, 2018, August 20, 2019, and November 20, 2025. Except where NRC approval for changes or

specified by 2, below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2, above.

2. The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of Entergy Nuclear Operations, Inc. (ENO) letter PNP 2019-028 dated May 28, 2019, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the refueling outage following the fifth full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
3. The licensee shall implement the items listed in Table S-3, "Implementation Items," of ENO letter PNP 2014-097 dated November 4, 2014, within six months after NRC approval, or six months after a refueling outage if in progress at the time of approval with the exception of Implementation Items 3 and 8 which will be completed once the related modifications are installed and validated in the PRA model.
- (4) [deleted]
- (5) [deleted]
- (6) Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:
 - a. Fire fighting response strategy with the following elements:
 1. Pre-defined coordinated fire response strategy and guidance
 2. Assessment of mutual aid fire fighting assets
 3. Designated staging areas for equipment and materials
 4. Command and control
 5. Training of response personnel
 - b. Operations to mitigate fuel damage considering the following:
 1. Protection and use of personnel assets
 2. Communications
 3. Minimizing fire spread
 4. Procedures for implementing integrated fire response strategy
 5. Identification of readily-available pre-staged equipment
 6. Training on integrated fire response strategy
 7. Spent fuel pool mitigation measures
 - c. Actions to minimize release to include consideration of:
 1. Water spray scrubbing
 2. Dose to onsite responders



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 282 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 letter dated June 24, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25175A275), as supplemented by letter dated September 30, 2025 (ML25274A074), to the U.S. Nuclear Regulatory Commission (NRC or the Commission), Holtec Decommissioning International, LLC (HDI) and Holtec Palisades, LLC,² (collectively, Holtec) submitted a license amendment request (LAR) to make certain changes to the Renewed Facility Operating License (RFOL) DPR-20 for Palisades Nuclear Plant (Palisades, PNP).

The proposed amendment would modify the PNP fire protection program license conditions 2.C.(3) and 2.C.(3)(c)2. Specifically, the proposed amendment would modify 2.C.(3)(c)2 to revise the full compliance date from “the fourth full operating cycle after NRC approval” to “the fifth full operating cycle after NRC approval” to allow an extension for the implementation of the remaining modifications necessary to achieve full compliance within paragraph 50.48(c) of title 10 of the *Code of Federal Regulations* (10 CFR), “National Fire Protection Association Standard NFPA 805.” The proposed amendment would also modify license condition 2.C.(3) to reference Holtec’s license amendment request and this NRC safety evaluation.

The supplement dated September 30, 2025, 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 July 18, 2025 (90 FR 34091).

2 On July 24, 2025, the NRC issued an order approving and a conforming amendment reflecting the transfer of operating authority from HDI to Palisades Energy, LLC (Package, ML25167A245). Holtec Palisades, LLC, remains the licensed owner of PNP.

2.0 REGULATORY EVALUATION

2.1 Program Description

By letter dated February 27, 2015 (ML15007A191), the NRC staff approved PNP to maintain a Fire Protection Plan (FPP) in accordance with 10 CFR 50.48(c) (NFPA 805) as an alternative to complying with 10 CFR 50.48(b) and Appendix R to 10 CFR part 50. The NRC issued revised pages 3 through 6 for Renewed Facility Operating License No. DPR-20, replacing the deterministic fire protection license condition 2.C.(3) with the current 10 CFR 50.48(c) (NFPA 805) license condition 2.C.(3), as amended.

A FPP in accordance with 10 CFR 50.48(c), uses risk information, in part, to demonstrate compliance with the fire protection and nuclear safety goals, objectives, and performance criteria of NFPA 805 and is referred to as a Risk-Informed/Performance-Based (RI/PB) FPP.

In the 1990s, the NRC worked with the National Fire Protection Association (NFPA) and industry to develop a risk-informed/performance-based (RI/PB) consensus standard for fire protection. In 2001, the NFPA Standards Council issued NFPA 805, "Performance-Based Standard for Fire Protection for Light Water Reactor [LWR] Electric Generating Plants," which describes a methodology for establishing fundamental FPP design requirements and elements, determining required fire protection systems and features, applying PB requirements, and administering fire protection for existing LWRs during operation, decommissioning, and permanent shutdown. It provides for the establishment of a minimum set of fire protection requirements but allows PB or deterministic approaches to be used to meet performance criteria. Pursuant to 10 CFR 50.48(c)(3)(i), licensees submit a request to comply with NFPA 805 in the form of an application for license amendment under 10 CFR 50.90.

Prior to the NRC staff's approval of PNP's NFPA 805 amendment on February 27, 2015, PNP was subject to its deterministic fire protection licensing basis in accordance with 10 CFR 50.48(a), 10 CFR 50.48(b), and Appendix R to 10 CFR 50. As was stated in its former deterministic Fire Protection license condition 2.C.(3), the PNP FPP was established in accordance with all provisions of its approved FPP as described in its Final Safety Analysis Report (FSAR) and as approved in various Safety Evaluation Reports (SERs).

When PNP transitioned its FPP to 10 CFR 50.48(c) (NFPA 805), this new RI/PB FPP licensing basis in conformance with NFPA 805 became effective immediately upon issuance of the amendment and superseded the previous deterministic licensing basis based on 10 CFR 50.48(b) and Appendix R to 10 CFR 50. Any exemptions to Appendix R that PNP had were no longer required since Appendix R was no longer a part of the licensing basis for PNP, and as such, the former license condition 2.D. referencing certain exemptions from the requirements of Section III.G of Appendix R to 10 CFR Part 50 was deleted. The new fire protection license condition also included a transition license condition which requires PNP to make plant, program, and procedure changes the licensee committed to and are needed for PNP to be in full conformance with the requirements of 10 CFR 50.48(c). Until the transition license condition is satisfied, PNP may only make changes to its FPP without prior NRC review and approval if the changes have no more than a minimal risk impact, and shall maintain appropriate compensatory measures until the licensee completes the required modifications.

2.2 Licensee's Proposed Changes

2.2.1 Revision to Transition License Condition 2.C.(3)(c)2

In its LAR dated June 24, 2025, the licensee proposed to modify its FPP by changing the due date to complete the plant modifications required to be completed per FPP transition License Condition 2.C.(3)(c)2.

The licensee proposed a revision to its FPP transition License Condition 2.C.(3)(c)2, which currently states:

The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of Entergy Nuclear Operations, Inc. (ENO) letter PNP 2019-028 dated May 28, 2019, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the refueling outage following the fourth full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

The current FPP transition license condition wording requires the licensee to complete the NFPA 805 modifications before the end of the refueling outage following the fourth full operating cycle after NRC approval. The licensee is requesting to revise FPP transition License Condition 2.C.(3)(c)2 to state (changes shown in **bold**):

The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of Entergy Nuclear Operations, Inc. (ENO) letter PNP 2019-028 dated May 28, 2019, to complete the transition to full compliance with 10 CFR 50.48(c) before the end of the refueling outage following the **fifth** full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

The change to the transition License Condition 2.C.(3)(c)2 necessitates further changes in License Condition 2.C.(3), "Fire Protection." The current License Condition 2.C.(3) for PNP states:

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 deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does

not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

The LAR proposes revising License Condition 2.C.(3), "Fire Protection," to state (changes shown in bold):

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, **and June 24, 2025**, 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, **and September 30, 2025**, as approved in the safety evaluations dated February 27, 2015, February 27, 2018, ~~and~~ August 20, 2019, **and November 20, 2025**. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

2.3 Regulatory Requirements

The following regulations address fire protection:

- Section 50.48, "Fire protection," of 10 CFR provides the NRC requirements for nuclear power plant fire protection. The NRC regulations include specific requirements for requesting approval for an RI/PB FPP based on the provisions of NFPA 805.
- Section 50.48(a)(1) of 10 CFR requires that each holder of an operating license have an FPP that satisfies General Design Criterion (GDC) 3, "Fire Protection," of Appendix A to 10 CFR Part 50, "General Design Criteria for Nuclear Power Plants."
- Section 50.48(c) of 10 CFR incorporates NFPA 805 (2001 Edition) by reference, with certain exceptions, modifications, and supplementation. This regulation establishes the requirements for using an RI/PB FPP in conformance with NFPA 805 as an alternative to the requirements associated with 10 CFR 50.48(b) and Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979," to 10 CFR Part 50, or the specific plant fire protection license condition. The regulation also includes specific requirements for requesting approval for an RI/PB FPP based on the provisions of NFPA 805.
- Paragraph 50.48(c)(3)(i) of 10 CFR states, that:

A licensee may maintain a fire protection program that complies with NFPA 805 as an alternative to complying with [10 CFR 50.48(b)] for plants licensed to operate before January 1, 1979, or the fire protection

license conditions for plants licensed to operate after January 1, 1979. The licensee shall submit a request to comply with NFPA 805 in the form of an application for license amendment under §50.90. The application must identify any orders and license conditions that must be revised or superseded, and contain any necessary revisions to the plant's technical specifications and the bases thereof. The Director of the Office of Nuclear Reactor Regulation, or a designee of the Director, may approve the application if the Director or designee determines that the licensee has identified orders, license conditions, and the technical specifications that must be revised or superseded, and that any necessary revisions are adequate. Any approval by the Director or the designee must be in the form of a license amendment approving the use of NFPA 805 together with any necessary revisions to the technical specifications.

- Appendix A to 10 CFR Part 50, GDC 3, states, in part, that:

Structures, systems, and components [SSCs] important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions. Noncombustible and heat resistant materials shall be used wherever practical throughout the unit, particularly in locations such as the containment and control room.

Pursuant to 10 CFR 50.90, whenever a holder of a license desires to amend the license or permit, an application for an amendment must be filed with the Commission describing the changes desired, and following, as far as applicable, the form prescribed for original applications. Accordingly, a licensee who seeks to amend its NFPA 805 authorizations must file an amendment stating, as applicable, the desired changes to orders, license conditions, and technical specifications.

Pursuant to 10 CFR 50.92(a), in determining whether an amendment to a license will be issued to the applicant, the Commission will be guided by the considerations, which govern the issuance of initial licenses to the extent applicable and appropriate.

Under 10 CFR 50.40, common standards for issuance of licenses include considerations of safety and satisfaction of the requirements of the National Environmental Policy Act of 1969 as implemented in 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions."

Under 10 CFR 50.57(a), to issue an operating license, the Commission must find, among other things, that: (1) there is reasonable assurance that the activities authorized by the operating license can be conducted without endangering the health and safety of the public; (2) there is reasonable assurance that such activities will be conducted in compliance with the regulations in this chapter; and (3) the issuance of the license will not be inimical to the common defense and security or to the health and safety of the public. Additional findings required to issue amendments related to fire protection are provided in 10 CFR 50.48.

2.4 Applicable Codes, Standards, and Regulatory Guides (RGs)

The 2001 edition of NFPA 805 specifies the minimum fire protection requirements for existing LWR nuclear power plants during all phases of plant operations, including shutdown, degraded

conditions, and decommissioning. NFPA 805 was developed to provide a comprehensive RI/PB standard for fire protection. The NFPA 805 Technical Committee on Nuclear Facilities is composed of nuclear plant licensees, the NRC, insurers, equipment manufacturers, and subject matter experts. The standard was developed in accordance with NFPA processes and consisted of technical meetings and reviews of draft documents by committee and industry representatives. The scope of NFPA 805 includes goals related to nuclear safety, radioactive release, life safety, and plant damage/business interruption. The standard addresses fire protection requirements for nuclear plants during all plant operating modes and conditions, including shutdown and decommissioning, which had not been explicitly addressed by previous requirements and guidelines. NFPA 805 became effective on February 9, 2001.

The Nuclear Energy Institute (NEI) 04-02, Revision 2, "Guidance For Implementing A Risk-Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c)," November 2019 (ML19351D277), provides guidance for implementing the requirements of 10 CFR 50.48(c), and represents methods for implementing in whole or in part a RI/PB FPP. This implementing guidance for NFPA 805 has two primary purposes: (1) provide direction and clarification for adopting NFPA 805 as an acceptable approach to fire protection, consistent with 10 CFR 50.48(c); and (2) provide additional supplemental technical guidance and methods for using NFPA 805 and its appendices to demonstrate compliance with fire protection requirements. Although there is a significant amount of detail in NFPA 805 and its appendices, clarification and additional guidance for select issues help ensure consistency and effective utilization of the standard. The NEI 04-02 guidance focuses attention on the RI/PB FPP fire protection goals, objectives, and performance criteria contained in NFPA 805 and the RI/PB tools considered acceptable for demonstrating compliance.

Revision 2 of Regulatory Guide (RG) 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light Water Nuclear Power Plants," May 2021 (ML21048A448), provides guidance for use in complying with the requirements that the NRC has issued for RI/PB FPPs that comply with 10 CFR 50.48 and the referenced 2001 Edition of the NFPA standard. Revision 1 of RG 1.205 sets forth regulatory positions, clarifies the requirements of 10 CFR 50.48(c) and NFPA 805, clarifies the guidance in NEI 04-02, Revision 2, and provides exceptions to the NEI 04-02 guidance where required. Should a conflict occur between NEI 04-02 and RG 1.205, the regulatory positions in RG 1.205 govern.

3.0 TECHNICAL EVALUATION

3.1 Change to the Completion Date for the Remaining Plant Modifications

Pursuant to 10 CFR 50.90, the licensee submitted an LAR to revise the PNP fire protection License Condition 2.C.(3)(c)2. In its LAR dated June 24, 2025, as supplemented by letter dated September 30, 2025, Holtec requested an extension to the due date to implement the remaining modifications necessary to achieve full compliance with 10 CFR 50.48(c).

3.1.2 Licensee's Technical Bases for Requested Change

In its LAR dated June 24, 2025, as supplemented by letter dated September 30, 2025, Holtec stated that due to the planned restart of the PNP in 2025, it is proposing a revision of the full compliance date for the FPP transition license condition to allow an extension for the implementation of the remaining modifications necessary to achieve full compliance with 10 CFR 50.48(c). Holtec stated that this proposed change is administrative in nature and that the license condition for making risk-informed changes without prior NRC approval is not effective

until Holtec has implemented all of the NFPA 805 modifications and PNP is in full compliance with 10 CFR 50.48(c).

Holtec stated that, the proposed change has no impact on the defense-in-depth (DID) echelons, which are: (1) prevent fires from starting, (2) rapidly detect, control, and extinguish promptly those fires that do occur thereby preventing fire damage, and (3) provide adequate level of fire protection for systems and structures so that a fire will not prevent essential safety functions from being performed, because changing the full compliance implementation date for fire protection program transition license condition 2.C.(3)(c)2 is not considered a change in methods. Holtec further stated that the proposed schedule change does not impact the level of fire protection provided so that a fire will not prevent essential safety functions from being performed, and that the proposed change continues to maintain adequate safety margins because the change does not impact any codes and standards, or their alternatives accepted for use by the NRC, and because the change does not impact any safety analysis acceptance criteria in the licensing basis.

Holtec stated that the proposed change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. Holtec further stated that the proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents and has no impact on the probability or consequences of an accident previously evaluated. Holtec stated that because there is no change to established safety margins as a result of this change, the proposed change does not involve a significant reduction in a margin of safety.

Holtec stated that its intent is to complete the modifications that provide a meaningful reduction in risk and/or are necessary for fire protection program compliance, apart from those listed below, prior to plant restart. Holtec also stated, however, that as work continues towards plant startup, there may be additional modifications affected by current or unforeseen economic and/or supply chain challenges that, depending on the circumstances, warrant extension to the revised full compliance date as well and that consistent with PRA requirements, the fire PRA model used for assessing current plant risk will only credit installed, as-built and as-operated plant modifications.

Of the modifications that Holtec currently does not expect to be completed prior to restart, Holtec stated that two of the modifications (S2-13 and S2-15) are intended to be completed prior to the revised full compliance date or otherwise addressed through additional LARs and NRC approval processes, while three of the modifications (S2-19, S2-23, and S2-37) are intended to be completed prior to the revised full compliance date. The five modifications are described below:

- Item S2-13, Component Cooling Water Heat Exchanger Temperature Control Valve Modification.
- Item S2-15, Reactor/Pressurizer Head Vent Valve Modification.
- Item S2-19, Alternate DC Power Supply for Auxiliary Hot Shutdown Panel EC-150.
- Item S2-23, Electrical Coordination modification.

- Item S2-37, Turbine Building Fresh Air Fan modification.

Regarding Items S2-13 and S2-15, Holtec stated that in the current probabilistic risk assessment (PRA) model the risk benefit of these modifications is shown to be minimal/negligible, and their rank would be considered Low/N/A.

Regarding Items S2-19 and S2-37, Holtec stated that in the current PRA model the risk benefit of these modifications is shown to be negligible (and they are not credited/represented in the post-transition fire PRA model).

Regarding Item S2-23, Holtec stated that in the current PRA model, the risk benefit of completing the remaining portions of this modification is shown to be minimal.

Holtec stated that this proposed change is acceptable given that the majority of the planned modifications characterized as “High” risk have already been installed, the remaining modifications will be installed prior to the end of the planned refueling outage 1R29, and the fire protection transition license conditions remain in effect during this period, including the continuation of appropriate compensatory measures. Holtec further stated that this proposed change is administrative in nature and has no impact on DID echelons or safety margins and that the license condition for making risk-informed changes without prior NRC approval is not effective until Holtec has implemented all of the NFPA 805 modifications and PNP is in full compliance with 10 CFR 50.48(c).

3.1.3 NRC Staff Evaluation

In accordance with 10 CFR 50.90, the licensee submitted an LAR to revise its NFPA 805 License Condition 2.C.(3)(c)2. The NRC staff reviewed the information provided in the LAR and 10 CFR 50.48(c) and RG 1.205, Section 2.1, to determine if the licensee’s proposed change to extend the due date to complete the remaining modifications is acceptable.

Section 50.48(c) of 10 CFR does not mandate a specific schedule or timeframe for implementing a FPP that meets NFPA 805. RG 1.205 provides guidance stating that licensees should include an implementation schedule with their request to adopt an FPP based on NFPA 805.

RG 1.205 states that for changes that involve acceptance of an existing unapproved condition (i.e., a noncompliance), appropriate compensatory measures should be established and should remain in place until either the plant is modified to achieve compliance, or the condition is found acceptable. RG 1.205 includes additional guidance that states that acceptance of the as-found condition may be the result of either the NRC’s review and approval, or the self-approval process, according to the licensee’s fire protection license condition. The sample license condition in RG 1.205 states, in part, that the licensee shall maintain appropriate compensatory measures in place until completion of the modifications.

The NRC has previously concluded in its safety evaluation dated February 27, 2015 (ML15007A191), that a transition phase to complete the modifications required for full compliance with 10 CFR 50.48(c), is acceptable pursuant to the transition license condition. Pursuant to PNP transition license condition 2.C.(3)(c)2., until the licensee is in full compliance with 10 CFR 50.48(c) by completing all its modifications, the licensee may only make changes to its FPP without prior NRC review and approval if the changes have no more than a minimal

risk impact and, in addition, appropriate compensatory measures shall remain in place until all the modifications are completed.

The licensee included discussions of the fire risk evaluation factors in its LAR. Fire risk evaluations provide risk information for the evaluation of fire protection features when changes are made, and as described by NFPA 805, Section 4.2.4.2, consist of integrated assessments of the acceptability of risk, defense-in-depth, and safety margins. The process compares the risk associated with implementation of the deterministic requirements with the proposed alternative. Because the proposed change is not canceling or changing any modifications, there is no impact to the previous fire risk-evaluations and no fire risk-evaluation is required to support this proposed change, so evaluation of the discussion regarding the fire risk evaluation factors is not needed for the NRC staff to reach a conclusion regarding this proposed change. Furthermore, 10 CFR 50.48(c) does not mandate any specific requirements for the schedule that implements a FPP that meets NFPA 805 and, therefore a fire risk evaluation is not applicable to a schedule extension request.

The proposed changes to the implementation date to allow a one cycle extension to complete the NFPA 805 modifications and to add the associated references for this LAR are administrative in nature because: (1) only the implementation date is proposed to be changed; (2) extending the date to achieve full compliance with 10 CFR 50.48(c) does not result in any change to risk or have any safety impact because there are no physical plant changes being made, there are no proposed modifications that are being changed or canceled, and there are no changes being made to any policy or procedure related to the FPP; and (3) the PNP license will continue to include a license condition imposing the use of NFPA 805 with a schedule to complete the remaining modifications and the fire protection transition license condition remains in effect during this period. As the licensee must maintain appropriate compensatory measures during the transition phase to achieve full compliance with 10 CFR 50.48(c), there is no impact on risk, DID echelons, or safety margins for an extension to implement the remaining modifications. Accordingly, while Holtec stated that completion of the modifications discussed above will only provide a minimal risk benefit, the NRC staff did not use those statements in making its findings because a risk, DID, and safety margins analysis is not required when requesting changes to the implementation date.

The NRC staff finds that the extension from the end of the refueling outage following the fourth full operating cycle to the fifth full operating cycle to implement the remaining modifications is acceptable because the proposed change is administrative in nature and the license will continue to include a license condition imposing the use of NFPA 805, together with an implementation schedule that follows the guidance of RG 1.205. Additionally, the fire protection transition license condition will remain in effect during this period, including maintaining compensatory measures until all the NFPA 805 modifications are completed, which follows the guidance of RG 1.205.

3.2 NRC Staff Conclusion

The NRC staff reviewed the licensee's application to change the full compliance implementation date for license condition 2.C.(3)(c)2. The licensee's application identified revisions to the license condition established in accordance 10 CFR 50.48(c)(3)(i). Based on a review of the information provided in the LAR, the NRC staff concludes that the LAR provided the appropriate license conditions that must be revised because of the proposed changes and that the license condition, as revised, continues to meet the requirements of 10 CFR 50.48(c)(3)(i).

Upon approval of a RI/PB FPP, implementation of a fire protection plan that satisfies Criterion 3 of Appendix A to 10 CFR part 50 is achieved under 10 CFR 50.48(c) as an alternative to complying with Appendix R to 10 CFR part 50 and is in accordance with the PNP NFPA 805 fire protection license condition 2.C.(3). Prior to completing the transition to full compliance with 10 CFR 50.48(c), the licensee is subject to PNP transition license condition 2.C.(3)(c) which identifies the list of modifications and implementation items that must be completed to support the NRC staff's conclusion and establishes a date to achieve full compliance with 10 CFR 50.48(c). Before the licensee can fully implement its NFPA 805 FPP and make Risk Informed changes to its fire protection program without NRC approval pursuant to its NFPA 805 fire protection license condition 2.C.(3)(a), the modifications and implementation items committed to as a part of its transition to NFPA 805 must be completed. The NRC staff concludes that the changes to License Condition 2.C.(3) to change the implementation date to allow a one cycle extension to complete the NFPA 805 modifications and to add the associated references for this LAR are administrative in nature and acceptable.

4.0 DISPOSTION OF PUBLIC COMMENTS

On July 18, 2025 (90 FR 34019), the NRC staff published a "Notice of Consideration of Issuance of Amendments to Facility Operating License, Opportunity to Comment, Request a Hearing, and Petition for Leave to Intervene" in the *Federal Register* associated with the proposed amendment requests. In accordance with the requirements in 10 CFR 50.91, "Notice for public comment; State consultation," the notice provided a 30-day period for public comment on the proposed no significant hazards consideration (NSHC) determination. There were 24 public comments received within the 30-day comment period regarding the proposed amendment, which can be found at Regulations.gov by searching Docket ID NRC-2025-0313. Of those 24, 22 were relevant comments to the staff's proposed NSHC determination. Two public comments did not specifically pertain to the proposed NSHC determination and thus go beyond the scope of the comment opportunity provided in the *Federal Register* notice; these comments (Comments 1 and 16) are not further addressed in this safety evaluation. Fifteen of the comments (3, 6, 8-12, 14, 15, 17-19, and 22-24) are generic in nature that either express their disagreement with the NRC's proposed NSHC and/or restate positions expressed by other commenters already on the docket and do not provide additional information. These comments are addressed by the NRC's responses to the comments below. The unique comments (2, 4, 5, 7, 13, 20, and 21) that pertain to the proposed NSHC determination are dispositioned as follows:

Comment 2

The commenter stated that they disagreed with the NRC's staff preliminary finding of NSHC and for the NRC to withhold acting on the license amendment until the Board has fully reviewed the comment and the hearing request. The commenter specifically identified portion of Holtec's NSHC that they believed to be incorrect. Specifically, the commenter stated that Holtec's claim that the "change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems" to be inaccurate. The commenter argues that delaying the fire-qualified upgrade directly affects accident analysis assumptions by undermining the operability of the Reactor Coolant Gas Vent System (RCGVS) during fire-induced loss of offsite power (LOOP) scenarios. The commenter also stated that Holtec's claim that the "proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents" is inaccurate. The commenter argues that post TMI Action plan (NUREG-0737) requirements and Appendix R to 10 CFR part 50 combine to require the vent valves to be

operable during concurrent accident and fire conditions. The commenter argues that modification S2-15 will address these integrated requirements to ensure post-accident heat removal and fire protection, and its deferral materially affects system readiness and licensing basis compliance. In addition, the commenter stated that Holtec's claim that the "change does not create the possibility of a new or different kind of accident" is incorrect. The commenter argues that a new failure mode is introduced – the simultaneous loss of forced cooling and loss of primary coolant system venting during a fire-induced LOOP. Finally, the commenter states that Holtec's claim that the "change does not involve a significant reduction in a margin of safety" is incorrect. The commenter argues that these valves are credited support functions for primary coolant system operability and that fire-hardened control systems and remote operability from the control room are part of the definition of "operable" to ensure availability under design-basis conditions.

NRC Response

Chapter 15 of PNP's Updated Final Safety Analysis report defines PNP's licensing basis accident analysis scenarios. Fires are not considered accidents in PNP's licensing basis.

Pursuant to 10 CFR 50.48, nuclear power plants licensed under 10 CFR part 50 or 52 must have a fire protection plan that satisfies Criterion 3 of Appendix A to 10 CFR part 50. The purpose of the fire protection program is to ensure safe shutdown of the plant, should a fire occur within different areas of the plant. As explained in Section 2.1 of this safety evaluation, PNP maintains a FPP that complies with NFPA 805, subject to a transition license condition in PNP's licensing basis.

Consistent with the requirements of 10 CFR 50.48, PNP is not required to postulate a Chapter 15 accident, such as a loss of cooling to the primary, in conjunction with a fire at the plant as the commenter asserts. As a result, the possibility that a fire may cause damage to a certain safety system, structure or component does not cause such system, structure or component to be considered "inoperable" or unable to mitigate a Chapter 15 accident.

As part of the transition to a NFPA 805 licensing basis, the licensee evaluated PNP for any noncompliances with fire protection requirements, which the NRC staff reviewed and approved in 2015. Pursuant to the transition license condition to full compliance with NFPA 805, until the modifications the licensee committed to are complete, the licensee must maintain appropriate compensatory measures. This license amendment request to extend the completion date does not affect or modify the transition license condition requirement that the licensee implement appropriate compensatory measures.

As staff concluded in this safety evaluation in Sections 3.1.3 and 3.2, this license amendment request is administrative in nature. It does not create or alter any accident analysis assumptions, add any initiators, or affect the function of plant systems. Furthermore, the change does not involve any significant reduction in a margin of safety.

To clarify, the purpose of modification S2-15 is to mitigate the chance of a spurious actuation of the vent valves in the event of a fire, not to ensure its operability to mitigate an accident during or after a fire.

Therefore, this comment does not demonstrate that a significant hazard consideration is involved with this license amendment request.

Regarding the commenter's request regarding withholding action on the LAR until the Board has reviewed the commenter's hearing request, the staff notes that Section 5.0 of this safety evaluation includes a discussion of the staff's final no significant hazards consideration determination, which was based on, among other things, the staff's review of public comments.

Comment 4

The commenter requested that the NRC reject Holtec's assertion that the change is administrative in nature and for the NRC to withhold acting on the license amendment until the Board has fully reviewed the comment and the hearing request. The commenter provided four reasons for their view. First is that this is an enforceable license condition which requires a license amendment to change and that requires a full and more in-depth safety evaluation and NRC review. Second is that the change impacts a dual-basis, dual-method evaluation safety system with deterministic method postaccident cooling requirements that cannot be substituted by fire protection program flexibility and use of a risk method alone. Third is that the change extends a long history of NRC deferred enforcement for Palisades' fire protection violations and that the NRC has already emphasized, starting in 2006, that further delay, and conditioned for the deferred enforcement, is only permissible when substantial progress has been demonstrated, as determined by the NRC. Fourth, that the change involves corrective actions the NRC previously found to be delayed beyond a time frame consistent with the safety significance.

NRC Response

As documented in the NRC staff's safety evaluation, the requested change is administrative in nature. This amendment request is to modify the transition license condition to allow for another outage before the modifications are required to be completed. This request does not eliminate or change any of the modifications from the list of required modifications for the plant to fully comply with NFPA-805. Should the licensee desire to modify or cancel a modification committed to and required pursuant to License condition 2.C.(3)(c)(2), the licensee must submit separate license amendment request. For the first supporting claim, the licensee is requesting the change through this license amendment request and the staff has performed a complete deterministic evaluation in this safety evaluation that has addressed all the relevant regulatory requirements for PNP. Regarding the second claim, the amendment was requested using a deterministic evaluation and moves the completion of the modifications out one additional outage and does not change the design or function of any system and the licensee did not propose, and the NRC did not utilize risk insights to evaluate the acceptability of this license amendment. Furthermore, as described in the NRC's response to Comment 2, fires are not accidents, and fires are not postulated before, during or after an accident and therefore there is no dual-basis, dual-method deterministic postaccident cooling requirement that requires the systems to be protected against a postulated fire and still be able to perform its safety function to be able to mitigate a postulated accident. For the third and fourth claims, the commenter is referring to older deferrals of enforcement, findings, and statements that the NRC has made against the licensee's previous fire protection program that was designed to meet the requirements of Appendix R to 10 CFR part 50. The current fire protection program is one designed to meet the requirements of NPFA-805 and those previous deferrals the commenter is pointing to are not relevant to the current fire protection plan. When PNP

was approved to comply with its NFPA 805 licensing basis as an alternative to Appendix R, the enforcement discretion related to Appendix R noncompliances ended and is not relevant to the current fire protection plan.

Therefore, this comment does not demonstrate that a significant hazard consideration is involved with this license amendment request.

Comment 5

The commenter provided additional citation to their Comment 4 related to their statements on the long history of NRC deferred enforcement for Palisades fire protection.

NRC Response

This comment provided additional information for the claims made in Comment 4. As stated in the NRC staff's response to Comment 4, the previous enforcement actions and findings were made against the licensee's previous FPP that was designed to meet the requirements of Appendix R to 10 CFR part 50.

Therefore, this additional information does not demonstrate that a significant hazard consideration is involved with this license amendment request.

Comment 7

The commenter stated that they disagreed with the NRC's staff preliminary finding of NSHC and requested that the NRC require that Holtec submit a full disclosure and impact evaluation of all compensatory measures associated with the deferred fire protection modifications and to evaluate the operational and safety implications of continued reliance on security officers for fire patrols. The commenter claims that omitting an evaluation on the impact of extending fire watches, a temporary fire protection measure originally permitted under deferred enforcement conditions, means that the NSHC is flawed.

NRC Response

As documented in the NRC staff's safety evaluation, the requested change is administrative in nature. This amendment request is to modify the transition license condition to allow for another outage before the modifications are required to be completed. The amendment does not add or modify any compensatory measures, which may include fire watches. When the staff approved Palisades to transition to a NFPA 805 licensing basis, it included the transition license condition that requires appropriate compensatory measures be maintained until the modifications are complete. This requirement to maintain appropriate compensatory measures continues in effect during this extension of time to complete the remaining modifications.

The matter regarding security officers was dispositioned and resolved through the NRC's enforcement process.

Therefore, this comment does not demonstrate that a significant hazard consideration is involved with this license amendment request.

Comment 13

The commenter stated that they believed the S2-15 modification, should be required to be in the technical specifications, as established by the Final Safety Analysis Report and the actions associated with NUREG-0737. And since they should be required to be in the technical specifications, Holtec failed to submit an adequate NSHC evaluation.

NRC Response

This amendment request is to modify the transitional license condition to allow for another outage before the modifications are required to be complete. Modification S2-15 is designed to provide fire hardening to reduce the chance of spurious operation of both the RCS and the pressurizer vent valves in the event of a fire.

While the pressurizer vent valves (safety valves) are already in the technical specifications at PNP Limiting Condition for Operation (LCO) 3.4.10, the RCS vent valves were not in the technical specifications previously and the amendment is not requesting them to add them to the technical specifications now. The NRC does not agree with the claim that these valves are required to be in the technical specifications since the NRC allowed the licensee to withdraw a license amendment that would have added these valves to the technical specifications in 1989 (ML18054A749). In the withdrawal letter the NRC stated that “we agree that removal of the subject requirements [primary coolant gas vent] from the technical specifications and placement under administrative control is consistent with the NRC interim position on the restructured technical specifications.”

Therefore, this comment does not demonstrate that a significant hazard consideration is involved with this license amendment request.

Comment 20

The commenter requested that the NRC reject Holtec’s assertion that the change is administrative in nature and for the NRC to withhold acting on the license amendment until the Board has fully reviewed the comment and the hearing request. The commenter also mentioned a long history of deferred enforcement for fire protection violations and that further delay is only permissible when substantial progress has been demonstrated. The commenter also states that Holtec must follow the conditions of the new operating license because a different regulatory framework applies.

NRC Response

This comment reiterates some claims already made by other comments already on the docket. The NRC’s responses to other comments have already covered the administrative claim and the claims about history of deferred enforcement.

The NRC disagrees with the commenters claim that this is a “new operating license.” When the licensee decided to shut the plant down in 2022, the Part 50 operating license that they had previously operated under was not terminated. Rather the conditions of the operating license were modified, using amendments, to support decommissioning activities and no longer allow operational activities. When the NRC issued the bundle of licensing activities on July 24, 2025, it was modifying that same Part 50 operating license to once again allow operational activities to occur, not issuing a new license.

Therefore, this comment does not demonstrate that a significant hazard consideration is involved with this license amendment request.

Comment 21

The commenter stated that they opposed the NRC's staff preliminary finding of NSHC and that the proposed changes are not administrative in nature and directly alters a binding license condition imposed since 1978 and repeatedly reinforced by subsequent licensing actions, including that the 1978 order would have encompassed today's license condition Table S2. The commenter claims that the NUREG-0737, Item II.B.1, because they were marked as technical specifications required, were now codified in Table S2-15. The commenter claims that violations and fines imposed on the plant in 1996 for failing to implement fire protection commitments equate to the modifications talked about in the application as being the same and therefore require a substantive safety review by the NRC. The commenter requested that the NRC reject the preliminary finding of NSHC, recognize that any further deferral of these obligations requires rigorous safety review under 10 CFR § 50.92 and cannot be approved as a mere administrative action, and withhold final action on this amendment request until the Board has fully reviewed the hearing request.

NRC Response

The NRC's response to Comments 2 and 4 addresses that this amendment is administrative in nature and the NRC Staff's safety evaluation documents the staff's review of the requested action to extend the transitional license condition for an additional outage. Further, in the NRC's response to comment 2, the staff noted that Section 5.0 of this safety evaluation includes a discussion of the staff's final no significant hazards consideration determination, which was based on, among other things, the staff's review of public comments. In the NRC's response to Comment 13, the staff provided documentation of the NRC's acceptance of the withdrawal of the license amendment request in 1989 consistent with the NRC's determination that the RCS vent valves do not need to be in the technical specifications. As stated in the NRC's response to Comment 4, the older fire protection requirements and licensing history under Appendix R are no longer applicable to PNP, as the plant is subject to the requirements of NFPA-805 as an alternative to Appendix R.

Therefore, this comment does not demonstrate that a significant hazard consideration is involved with this license amendment request.

Regarding some of the comments that are out of scope of the staff's NSHC determination, the staff notes that the at least one of the commenters had raised similar issues through other NRC processes related to this LAR, including a request for hearing, and a request made pursuant to 10 CFR 2.206, "Requests for action under this subpart." For example, the commenters raised similar issues in a hearing request filed on this LAR (ML25250A001) as supplemented (ML25305A001 and ML25310A001, respectively). These other processes are still underway and the outcome of each will be documented in accordance with the associated process.

The NRC staff received several NSHC comments outside the 30-day comment period from a single commenter regarding the licensee's supplement dated September 30, 2025. The commenter asserted, among other things, that the scope of the license amendment request was expanded by the licensee's September 30, 2025, supplement, and sought to challenge the

staff's NSHC determination based on the additional modifications that the licensee indicated would be deferred. However, the NRC staff's responses to other comments have already explained that the license amendment request is administrative in nature, that appropriate compensatory measures must remain in place, and that no modifications committed to are being modified or cancelled. Additionally, to the extent the commenter asserted that the scope of the license amendment request was expanded by the licensee's supplement, this is addressed in Section 5.0 of this safety evaluation.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

As mentioned above, the NRC staff's proposed NSHC determination was published in the *Federal Register* on July 18, 2025 (90 FR 34019). On September 9, 2025, the NRC received a hearing request on this LAR, as supplemented on November 1, 2025, and November 6, 2025, from Mr. Alan Blind on behalf of himself and Jody Flynn, Tom Flynn, Bruce Davis, Karen Davis, Christian Moevs, Mary Huffman, Chuck Huffman, Dianne Ebert, David Simonelli, Terese McCarthy Alsterda, William Connor, and Telene Edington. The hearing request is pending before the Atomic Safety and Licensing Board. Due to the lapse in government funds, on October 1, 2025, the Secretary of the Commission issued a Notice (ML25274A098) which suspended the litigation until the NRC's funding has been restored.

On September 30, 2025, the licensee submitted a supplement that 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*. The notice from July stated, "The proposed amendment would modify the PNP fire protection program license conditions 2.C.(3) and 2.C.(3)(c)2. Specifically, the proposed amendment would modify 2.C.(3)(c)2 to revise the full compliance date from 'the fourth full operating cycle after NRC approval' to 'the fifth full operating cycle after NRC approval' to allow an extension for the implementation of the remaining modifications necessary to achieve full compliance within paragraph 50.48(c) of title 10 of the *Code of Federal Regulations* (10 CFR), 'National Fire Protection Association Standard NFPA 805.' The proposed amendment would also modify license condition 2.C.(3) to make reference to this license amendment request and subsequent NRC safety evaluation."

While the September 30, 2025, supplement updated Section 2.1 of the LAR "Reason for the Proposed Change" by updating the description of the modifications that are currently planned to not be completed prior to the plant restarting, the scope of the notice remains the same, i.e., the request is to amend the license condition to extend the date to complete the remaining modifications from the fourth to the fifth full operating cycle. The NRC staff document in this safety evaluation that operation under the transition license condition was previously found to be acceptable in the 2015 NFPA 805 safety evaluation and that extending the date to complete the remaining modifications by an additional outage is administrative in nature. The description of the modifications being deferred in Section 2.1 "Reason for the Proposed Change," as supplemented, provided an up to date report of the status of PNP's completion of the compensatory measures committed to but was not relevant in the NRC's technical evaluation of the administrative extension request. Therefore, while the September 30, 2025, supplement provided additional information that clarified the application by providing updated information about the FPP at PNP, it did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination.

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 change to the PNP RFOL to change the full compliance date for the fire protection program transition license condition to allow additional time for the implementation of the remaining modifications necessary to achieve full compliance with 10 CFR 50.48(c) is administrative in nature. This change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents and has no impact on the probability or consequences of an accident previously evaluated.

Therefore, this change 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 change to the PNP RFOL to change the full compliance date for the fire protection program transition license condition to allow additional time for the implementation of the remaining modifications necessary to achieve full compliance with 10 CFR 50.48(c) is administrative in nature. This proposed change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems, and components relied upon to mitigate the consequences of postulated accidents and does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Therefore, this change does not create the possibility of a new or different kind of accident from an accident previously evaluated.

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

Response: No.

The proposed change to the PNP RFOL to change the full compliance implementation date for the fire protection program transition license condition to allow additional time for implementation of the remaining modifications necessary to achieve full compliance with 10 CFR 50.48(c) is administrative in nature. Plant safety margins are established through limiting conditions for operation, limiting safety system settings, and safety limits specified in the technical specifications. Because there is no change to established safety margins as a result of this change, the proposed change does not involve a significant reduction in a margin of safety.

Therefore, this change does not involve a significant reduction in a margin of safety.

The NRC staff reviewed Holtec's no significant hazards consideration determination. Based on this review, the staff's evaluation of the underlying LAR, as supplemented, as discussed above, and consideration of the public comments discussed in Section 4.0 of this safety evaluation, 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.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment on October 15, 2025. The Michigan State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes requirements with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued proposed findings that the amendment involves no significant hazards consideration, and the public comments on such findings published in the *Federal Register* on July 18, 2025 (90 FR 34019), have been discussed in Section 4.0 of this safety evaluation. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment.

8.0 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 Contributors: J. Robinson, NRR
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Date of issuance: November 20, 2025

SUBJECT: PALISADES NUCLEAR PLANT - ISSUANCE OF AMENDMENT NO. 282
REGARDING A CHANGE TO THE FULL COMPLIANCE IMPLEMENTATION
DATE FOR THE FIRE PROTECTION PROGRAM (EPID L-2025-LLA-0097)
DATED NOVEMBER 20, 2025

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***via eConcurrence**

NRR-058

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