



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

November 3, 2025

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

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

Dear Sir or Madam:

By letter dated July 24, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25157A107), the U.S. Nuclear Regulatory Commission (NRC) issued Amendment No. 277 to Renewed Facility Operating License (RFOL) No. DPR-20 for the Palisades Nuclear Plant (PNP). The amendment was in response to the license amendment request (LAR) by Holtec Decommissioning International, LLC (HDI), on behalf of Holtec Palisades, LLC¹ (collectively, Holtec), dated February 9, 2024 (ML24040A089), as supplemented by letter dated July 31, 2024 (ML24213A082). The amendment revised selected sections of the Permanently Defueled Technical Specifications (PDTs) to reflect the reauthorization of power operations at the PNP. The NRC staff issued two amendments on July 24, 2025, that revised the PNP RFOL and PDTs to support reauthorization of power operations. The amendment that is the subject of this letter reinstated certain TS administrative controls previously in effect at PNP. The other, Amendment No. 276 (ML25157A127), reinstated the applicable TS technical requirements into the PNP license.

When Amendment No. 277 was issued, errors were introduced on the cover page for Appendix A to RFOL DPR-20 and Appendix A, pages 1.1-1 and 1.1-4. Specifically, Amendment No. 276 revised the cover page of Appendix A from “Permanently Defueled Technical Specifications,” to “Technical Specifications,” and revised Appendix A, page 1.1-1 to add definitions for AVERAGE DISINTEGRATION ENERGY - \bar{E} , AXIAL OFFSET (AO), and AXIAL SHAPE INDEX (ASI). The changes to the Appendix A cover page and Appendix A, page 1.1-1 by Amendment No. 276 should have been retained with the issuance of Amendment No. 277 but were inadvertently removed. Additionally, Amendment No. 277 revised the TS to remove the definition of NON-CERTIFIED OPERATOR, as requested in the licensee’s application and evaluated in the NRC staff’s safety evaluation for the amendment. However, a revised Appendix A, page 1.1-4 was not issued with Amendment No. 277, and the definition was retained in the TS. The NRC staff concludes that the errors were introduced during the preparation and sequencing of the amendments necessary to reinstate the power operations licensing basis at

¹ 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.

PNP and are, therefore, entirely editorial in nature. The corrected PNP Appendix A cover page and Appendix A, pages 1.1-1 and 1.1-4 are enclosed, which incorporate the changes of amendments 276 and 277. Please remove the current pages and insert the corrected pages.

The corrections do not change any of the conclusions in the safety evaluation associated with the amendments referenced above and do not affect the associated notices to the public.

If you have any questions, please contact me at 301 415-2048 or via e-mail at Justin.Poole@nrc.gov.

Sincerely,

/RA - B. Ballard for/

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

Docket No. 50-255

Enclosure:
Corrected Appendix A cover page
and Appendix A, pages 1.1-1 and 1.1-4

cc: Listserv

ENCLOSURE: CORRECTED PAGES

HOLTEC PALISADES, LLC

PALISADES ENERGY, LLC

PALISADES NUCLEAR PLANT

DOCKET NO. 50-255

PALISADES PLANT
RENEWED FACILITY OPERATING LICENSE DPR-20
APPENDIX A

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.
AVERAGE DISINTEGRATION ENERGY - \bar{E}	\bar{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the primary coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives > 15 minutes, making up at least 95% of the total noniodine activity in the coolant.
AXIAL OFFSET (AO)	AO shall be the power generated in the lower half of the core less the power generated in the upper half of the core, divided by the sum of the power generated in the lower and upper halves of the core (determined using the incore monitoring system).
AXIAL SHAPE INDEX (ASI)	ASI shall be the power generated in the lower half of the core less the power generated in the upper half of the core, divided by the sum of the power generated in the lower and upper halves of the core (determined using the excore monitoring system).

1.1 Definitions

LEAKAGE

LEAKAGE shall be:

a. Identified LEAKAGE

1. LEAKAGE, such as that from pump seals or valve packing (except Primary Coolant Pump seal water leakoff), that is captured and conducted to collection systems or a sump or collecting tank;
2. LEAKAGE into the containment atmosphere from sources that are both specifically located and known not to interfere with the operation of leakage detection systems and not to be pressure boundary LEAKAGE; and
3. Primary Coolant System (PCS) LEAKAGE through a Steam Generator to the Secondary System (primary to secondary LEAKAGE).

b. Unidentified LEAKAGE

All LEAKAGE (except Primary Coolant Pump seal leakoff) that is not identified LEAKAGE;

c. Pressure Boundary LEAKAGE

LEAKAGE (except primary to secondary LEAKAGE) through a nonisolable fault in a PCS component body, pipe wall, or vessel wall.

MODE

A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average primary coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.

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