

From: [Dennis Galvin](#)
To: [Terry Lodge](#)
Cc: [Michael Keegan](#); [Kevin Kamps](#); wtaylor784@aol.com; [Petition Resource](#)
Subject: Status Update on the NRC Staff Evaluation of the Palisades Steam Generator Sleeving 2.206 Petition Submitted July 29, 2025
Date: Friday, November 21, 2025 2:57:10 PM

Dear Mr. Lodge,

By email dated July 29, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25212A137), you submitted, on behalf of Beyond Nuclear, Don't Waste Michigan, Michigan Safe Energy Future, Three Mile Island Alert and Nuclear Energy Information Service, a petition to the Nuclear Regulatory Commission (NRC) for consideration under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.206. The petition requested the following enforcement actions against Holtec Decommissioning International, LLC, and Holtec Palisades, LLC regarding the Palisades Nuclear Plant.

1. An immediate suspension of Holtec's premature installation of sleeves in degraded steam generator tubes, followed by thorough analysis of the status of the steam generators.
2. The legal intervention process be rigorously followed and that no further construction or reconstruction of the steam generator tubes be authorized until the end of the adjudication.

On September 30, I informed you that your petition screened into the 2.206 process in accordance with MD 8.11, DH Section II.A.2(d) and a petition review board (PRB) is evaluating your petition.

The Federal Government shut down from October 1 through November 12, 2025, resulted in a temporary suspension of most regulatory review activities at the U.S. NRC, including the review of 2.206 petitions. The NRC is assessing the impacts to the schedule for regulatory review activities under review during this period, including for the review of 2.206 petitions. Thus, your petition remains under evaluation.

I am also acknowledging the reception and issuance of some documents related to the petition since my last communication. On October 7, 2025, the licensee submitted the "Third Supplement to Response to Second Request for Additional Information Regarding License Amendment Request to Revise Selected Permanently Defueled Technical Specifications to Support Repairing of Steam Generator Tubes by Sleeving" (ML25280A082, which is an ADAMS package for 3 large files). The submittal contains in part Framatome documents 51-9382488-002, *Palisades Steam Generator Condition Monitoring for 1R28*, and 51-9394013-002, *Palisades Steam Generator Operational Assessment for Cycle 29*, (collectively referred to as the Condition Monitoring and Operational Assessment (CMOA)).

On October 30, 2025, the NRC issued Amendment No. 281 to Renewed Facility Operating License No. DPR-20 for the Palisades Nuclear Plant (ML25303A280). The amendment revises the technical specifications to allow the use of Framatome Alloy 690 sleeves to repair defective steam generator tubes as an alternative to removing the tubes from service

by plugging.

Please feel free to contact me with any questions about the process and/or the status of the PRB's evaluation.

Respectfully,

Dennis Galvin
Project Manager / Agency 2.206 Petition Coordinator
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Operating Reactor Licensing
Plant Licensing Branch II-2
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