



PNP 2025-081

10 CFR 26.9

December 12, 2025

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Palisades Nuclear Plant
NRC Docket No. 50-255
Renewed Facility Operating License No. DPR-20

Subject: Second Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours"

- References:
- 1) Holtec Palisades, LLC (Holtec Palisades) letter to U.S. Nuclear Regulatory Commission (NRC), *Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours,"* dated August 12, 2025 (ADAMS Accession No. ML25224A206)
 - 2) Holtec Palisades letter to NRC, *Supplement and Response to Request for Confirmatory Information Regarding Request for Exemption from Requirements of 10 CFR 26.205,* dated October 15, 2025 (ADAMS Accession No. ML 25288A074)
 - 3) NRC letter to Holtec Palisades, *Palisades Nuclear Plant – One-Time Exemption from the Requirements of 10 CFR 26.205(d)(3) and (d)(7) (EPID L-2025-LLE-0022),* dated October 24, 2025 (ADAMS Accession Nos. ML25293A005 and ML25293A007)

By letter dated August 12, 2025 (Reference 1), in accordance with Title 10 of the Code of Federal Regulations (10 CFR), Part 26, *Fitness for Duty Programs*, Section 26.9, *Specific exemptions*, Palisades Energy, LLC (Palisades Energy) requested U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the specific requirements of 10 CFR 26.205, *Work hours*. The proposed exemption, as supplemented by the letter dated October 15, 2025 (Reference 2), would allow the use of the less restrictive work hour limitations specified in 10 CFR 26.205(d)(4) and (d)(5) in lieu of the requirements of 10 CFR 26.205(d)(3) and (d)(7) for an additional 60-day period to support outage activities for restart of the Palisades Nuclear Plant (PNP).

On October 24, 2025 (Reference 3), the NRC granted the requested one-time exemption to use the less restrictive outage work hour controls in 10 CFR 26.205(d)(4) and (d)(5) for a period not to exceed 60 days to support restart activities during the period of the proposed exemption. The exemption period commenced on November 3, 2025 and will expire on January 1, 2026.

The Enclosure to this letter provides Palisades Energy's second request for a one-time exemption from the specific requirements of 10 CFR 26.205. This proposed exemption would

allow use of the less restrictive outage work hour controls in 10 CFR 26.205(d)(4) for an additional period of 60 days, to commence on January 2, 2026. The proposed exemption would apply to personnel performing duties specified in 10 CFR 26.4(a)(2) [Health Physics and Chemistry] and 10 CFR 26.4(a)(4) [Maintenance and Projects].

An Environmental Assessment supporting the exemption request is provided in Attachment 1 to the Enclosure.

One new commitment regarding the controls on work hours to manage cumulative worker fatigue is provided Attachment 2 to the Enclosure.

Palisades Energy requests approval of the exemption request no later than December 19, 2025 to support the ongoing activities that are critical for the successful completion of the current outage and restart of PNP.

If you have any questions regarding this submittal, please contact Kami Miller, Regulatory Assurance Manager, at (269) 764-2375.

Respectfully,

Jean A.
Fleming

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Enclosure: Second Request for Exemption from Requirements of 10 CFR 26.205

Enclosure Attachments: 1. Palisades Nuclear Plant – Environmental Assessment

2. List of Regulatory Commitments

cc: NRC Region III Regional Administrator
NRC Senior Resident Inspector – Palisades Nuclear Plant
NRC Project Manager – Palisades Nuclear Plant

PNP 2025-081

Enclosure

Second Request for Exemption from Requirements of 10 CFR 26.205

Second Request for Exemption from Requirements of 10 CFR 26.205

SUMMARY

By letter dated August 12, 2025 (Reference 1), in accordance with Title 10 of the Code of Federal Regulations (10 CFR), Part 26, *Fitness for Duty Programs*, Section 26.9, *Specific exemptions*, Palisades Energy, LLC (Palisades Energy) requested U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the specific requirements of 10 CFR 26.205, *Work hours*. In the NRC letter dated October 24, 2025, *Palisades Nuclear Plant Exemption* (Reference 2), Palisades Energy was granted approval of a one-time exemption from the specific requirements of 10 CFR 26.205. The exemption allows use of the less restrictive work hour limitations specified in 10 CFR 26.205(d)(4) and (d)(5) in lieu of the requirements of 10 CFR 26.205(d)(3) and (d)(7) for an additional 60-day period to support ongoing outage activities and subsequent restart of the Palisades Nuclear Plant (PNP). The exemption commenced on November 3, 2025 and will expire on January 1, 2026.

After receipt of the approved exemption, the period needed to support the PNP outage and restart activities was re-assessed, and it was determined that a second 60-day exemption period will be needed for use of the less restrictive work hour limitations of 10 CFR 26.205(d)(4). Note that it was determined that an exemption from the work hour limitations of 10 CFR 26.205(d)(5) would not be needed for the proposed second 60-day exemption period. The additional time under the less restrictive work hour limitations will allow more flexibility for the scheduling of covered work tasks and individual work hours to better manage cumulative fatigue. This supports the primary purpose of the fatigue rule, which is to ensure cumulative fatigue does not compromise the ability of covered individuals to perform their duties safely and competently.

The period of the proposed exemption would commence on January 2, 2026, and be in effect until the end of the current PNP Cycle 28 outage, or March 2, 2026, whichever is sooner. The proposed exemption would apply to the covered workers in the groups described in 10 CFR 26.4(a)(2) [Health Physics and Chemistry] and 10 CFR 26.4(a)(4) [Maintenance and Projects].

APPLICABLE 10 CFR 26 REQUIREMENTS

10 CFR 26.4(a) defines the categories of individuals that are subject to the work-hour controls specified in 10 CFR 26.205. These categories are for persons performing the following activities:

- (1) *Operating or onsite directing of the operation of systems and components that a risk-informed evaluation process has shown to be significant to public health and safety;*
- (2) *Performing health physics or chemistry duties required as a member of the onsite emergency response organization minimum shift complement;*
- (3) *Performing the duties of a fire brigade member who is responsible for understanding the effects of fire and fire suppressants on safe shutdown capability;*

- (4) *Performing maintenance or onsite directing of the maintenance of SSCs that a risk-informed evaluation process has shown to be significant to public health and safety; and*
- (5) *Performing security duties as an armed security force officer, alarm station operator, response team leader, or watchman, hereinafter referred to as security personnel.*

10 CFR 26.205(d)(3) provides the following requirements:

Licensees shall either ensure that individuals have, at a minimum, the number of days off specified in this paragraph, or comply with the requirements for maximum average workhours in § 26.205(d)(7). For the purposes of this section, a day off is defined as a calendar day during which an individual does not start a work shift. For the purposes of calculating the average number of days off required in this paragraph, the duration of the shift cycle may not exceed 6 weeks.

- (i) *Individuals who are working 8-hour shift schedules shall have at least 1 day off per week, averaged over the shift cycle;*
- (ii) *Individuals who are working 10-hour shift schedules shall have at least 2 days off per week, averaged over the shift cycle;*
- (iii) *Individuals who are working 12-hour shift schedules while performing the duties described in § 26.4(a)(1) through (a)(3) shall have at least 2.5 days off per week, averaged over the shift cycle;*
- (iv) *Individuals who are working 12-hour shift schedules while performing the duties described in § 26.4(a)(4) shall have at least 2 days off per week, averaged over the shift cycle; and*
- (v) *Individuals who are working 12-hour shift schedules while performing the duties described in § 26.4(a)(5) shall have at least 3 days off per week, averaged over the shift cycle.*

10 CFR 26.205(d)(4) provides the following requirements:

During the first 60 days of a unit outage, licensees need not meet the requirements of § 26.205(d)(3) or (d)(7) for individuals specified in § 26.4(a)(1) through (a)(4), while those individuals are working on outage activities. However, the licensee shall ensure that the individuals specified in § 26.4(a)(1) through (a)(3) have at least 3 days off in each successive (i.e., non-rolling) 15-day period and that the individuals specified in § 26.4(a)(4) have at least 1 day off in any 7-day period.

10 CFR 26.205(d)(7) provides the following requirements:

Licensees may, as an alternative to complying with the minimum days off requirements in § 26.205(d)(3), comply with the requirements for maximum average work hours in this paragraph.

- (i) *Individuals may not work more than a weekly average of 54 hours, calculated using an averaging period of up to six (6) weeks, which advances by 7 consecutive calendar days at the finish of every averaging period.*

- (ii) *For purposes of this section, when an individual's work shift starts at the end of a calendar day and concludes during the next calendar day, the licensee shall either consider the hours worked during that entire shift as if they were all worked on the day the shift started, or attribute the hours to the calendar days on which the hours were actually worked.*
- (iii) *Each licensee shall state, in its FFD policy and procedures required by § 26.27 and § 26.203(a) and (b), the work hour counting system in § 26.205(d)(7)(ii) the licensee is using.*

10 CFR 26.9, *Specific exemptions*, states:

Upon application of any interested person or on its own initiative, the Commission may grant such exemptions from the requirements of the regulations in 10 CFR 26 as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest.

PROPOSED EXEMPTION

Palisades Energy requests an exemption from the requirements of 10 CFR 26.205 that would allow the less restrictive work hour limitations described in 10 CFR 26.205(d)(4) to be applied to support the ongoing outage activities and subsequent plant restart, in lieu of the work hour limitations described in 10 CFR 26.205(d)(3) and (d)(7). The proposed exemption would be applicable for a period not to exceed 60 days. This proposed exemption period will effectively extend the current 60-day exemption period, which will expire on January 1, 2026, for an additional 60 days, and would commence on January 2, 2026. The exemption would remain in effect until the end of the current PNP Cycle 28 outage, or March 2, 2026, whichever is sooner. During the period of the exemption, Palisades Energy will apply the limitations of 10 CFR 26.205(d)(4) to the individuals performing the duties specified in 10 CFR 26.4(a)(2) [Health Physics and Chemistry] and 10 CFR 26.4(a)(4) [Maintenance and Projects].

BASIS FOR PROPOSED EXEMPTION

In accordance with 10 CFR 26.9, *Specific exemptions*, the NRC may grant exemptions from the regulations that are determined to be authorized by law, that do not endanger life or property or the common defense and security, and are otherwise in the public interest. This exemption request satisfies these requirements.

The proposed exemption is authorized by law in that no other prohibition of law exists to preclude the activities which would be authorized by the exemption. The provisions of 10 CFR 26.9 allow the NRC to grant exemptions from the requirements of 10 CFR 26. Therefore, the proposed exemption is authorized by law.

As described in the Federal Register Notice (73 FR 16966), the purpose of 10 CFR 26, Subpart I, *Managing Fatigue*, is to provide assurance that cumulative fatigue does not compromise the abilities of individuals to safely and competently perform their duties. The maximum average work hour requirements of 10 CFR 26.205(d)(7) address the long-term control of work hours while permitting the occasional use of extended work hours for short duration circumstances such as equipment failure, personnel illness, or attrition. The requirements of 10 CFR 26.205(d)(4) allow a 60-day period in which the maximum average work hour

requirements of 10 CFR 26.205(d)(7) are replaced by less restrictive requirements. The limitations in 10 CFR 26.205(d)(4) address the control of work hours for unique plant conditions, such as unit outages, which require extended work hours for a more sustained period of time. The less restrictive limitations of 10 CFR 26.205(d)(4) provide licensees flexibility in scheduling required days off while accommodating the more intensive work schedules that accompany a unit outage. Limiting the time period in which the less restrictive limitations may be applied provides assurance that cumulative fatigue does not compromise the ability of individuals to safely and competently perform their duties.

The proposed exemption would allow the less restrictive work hour limitations to be applied during an additional 60-day period to support the ongoing outage activities and subsequent plant restart. The exemption will apply to the personnel performing the duties defined in 10 CFR 26.4(a)(2) [Health Physics and Chemistry] and 10 CFR 26.4(a)(4) [Maintenance and Projects]. Prior to the January 1, 2026 expiration date of the current work hour exemption (Reference 2), these personnel will observe a two-week rest and reset period, which will begin on December 19, 2025 and extend through January 1, 2026. The proposed additional 60-day exemption period will commence on January 2, 2026.

Palisades Energy uses the Certrec Fatigue Rule Management System (FRMS) to prepare work schedules and to track covered work hours. The FRMS individual work schedule reports for the period from November 3, 2025 through December 18, 2025 are available for NRC review upon request. A description of each group's typical work schedule is provided below.

Fatigue Management – Group 10 CFR 26.4(a)(2)		
10 CFR	Position	Schedule 11/03 to 12/18/2025
26.4(a)(2)	Chemistry	<ul style="list-style-type: none"> The individuals in this group work 8-hour and 9-hour shifts for 5 consecutive days, followed by 2 consecutive days off. Select individuals in this group work 12-hour shifts for 4 consecutive days, followed by 3 consecutive days off. This group will observe the two week rest/reset period.
26.4(a)(2)	Health Physics	<ul style="list-style-type: none"> The individuals in this group work 12-hour shifts for 4 consecutive days followed by 1 day off. Additional days off are provided where practicable, to support fatigue management. This group will observe the two week rest/reset period.

Fatigue Management – Group 10 CFR 26.4(a)(4)		
10 CFR	Position: Maintenance / Projects	Schedule 11/03 to 12/18/2025
26.4(a)(4)	Projects	<ul style="list-style-type: none"> • 12-hour shifts, 6 days on, 1 day off.
26.4(a)(4)	Alloy 600 Mitigation Project	<ul style="list-style-type: none"> • 12-hour shifts, 6 days on, 1 day off.
26.4(a)(4)	Mechanical Maintenance	<ul style="list-style-type: none"> • 12-hour shifts, 4 days on, 3 days off.
26.4(a)(4)	Champion Electricians	<ul style="list-style-type: none"> • 10-hour shifts, 5 days on, 2 days off.
26.4(a)(4)	Champion Projects	<ul style="list-style-type: none"> • 10-hour shifts, 5 days on, 2 days off with select individuals working 12-hour shifts, 5 days on, 2 days off.
26.4(a)(4)	Electrical Maintenance	<ul style="list-style-type: none"> • 12-hour shifts, 4 days on, 3 days off, or 5 days on, 2 days off.
26.4(a)(4)	Instrumentation and Controls (I&C) Maintenance	<ul style="list-style-type: none"> • 12-hour shifts, 4 days on, 3 days off.
26.4(a)(4)	Insulators	<ul style="list-style-type: none"> • 10-hour shifts, 5 days on, 2 days off.
26.4(a)(4)	Pipefitters	<ul style="list-style-type: none"> • 10-hour shifts, 5 days on, 2 days off.
26.4(a)(4)	Boilermakers	<ul style="list-style-type: none"> • 10-hour shifts, 5 days on, 2 days off.
<p>Summary</p> <p>As described above, to support the ongoing PNP outage activities and subsequent plant restart, the covered individuals in group 10 CFR 26.4(a)(4) will be required to work various schedules. All schedules will remain compliant with 10 CFR 26.205(d)(4). To ensure an adequate reset before continuing outage activities, the individuals in this group will work a maximum of 50 hours per week from December 19, 2025 through January 1, 2026. Accordingly, this group will observe the two week rest/reset period.</p>		

MITIGATING STRATEGY

- PNP has successfully identified three of the five covered worker classification groups to be excluded from this request. As described above, Operations, Fire Brigade, and Security will continue to maintain compliance with the non-outage maximum average work hour requirements of 10 CFR 26.205(d)(7). This strategy will ensure proper cumulative fatigue management for a percentage of the covered workforce.
- Since the start of the original exemption period on November 3, 2025, the covered workers in groups 10 CFR 26.4(a)(2) [Health Physics and Chemistry] and 10 CFR 26.4(a)(4) [Maintenance and Projects] have maintained work hours compliant with 10 CFR 26.205(d)(1), (d)(2), and (d)(4). In addition to complying with these requirements,

Palisades Energy is committing the individuals identified in groups (a)(2) [Health Physics and Chemistry] and (a)(4) [Maintenance and Projects] to a two-week rest and reset period prior to the start of the proposed 60-day extended exemption period. During the two-week rest and reset period (from December 19, 2025 through January 1, 2026), an average of 50 hours per week or less for the covered workers in the Health Physics department, Chemistry department, Maintenance department, and Projects department will be maintained.

- The covered individuals in groups 10 CFR 26.4(a)(1) [Operations], (a)(3) [Fire Brigade], and (a)(5) [Security] will have maintained a schedule compliant with the non-outage maximum average work hour requirements of 10 CFR 26.205(d)(7) throughout the original exemption period from November 3, 2025 through January 1, 2026. Therefore, the individuals in the Operations department, the Fire Brigade, and Security department are not included in this exemption request and will not be subject to the rest and reset period from December 19, 2025 to January 1, 2025.
- In addition to maintaining the requirements in 10 CFR 205(d)(1), (2), and (4), and observing the two-week rest and reset period, cognizant supervisors will assess employees for fatigue and mental alertness during the proposed exemption period.

PRECEDENT

- On June 11, 2013, the NRC approved a request, as supplemented, for exemption from 10 CFR 26.205 for Fort Calhoun Station, Unit 1 (ML13157A135 and ML13157A139). Fort Calhoun is cited as precedent because the exemption was needed to support an extended outage. The exemption allowed the use of the less restrictive working hour limitations described in 10 CFR 26.205(d)(4) and (d)(5) to support activities for a period not to exceed 60 days.
- On October 28, 2013, the NRC approved a request, as supplemented, for a second exemption from the requirements of 10 CFR 26.205 for Fort Calhoun Station, Unit 1 (ML13274A025 and ML13274A026). Fort Calhoun is again cited as precedent because the exemption was needed to allow use of the less restrictive working hour limitations described in 10 CFR 26.205(d)(4) to support activities required for plant startup from the extended outage. The previous 60-day exemption period approved by the NRC on June 11, 2013 for the extended outage had expired. The second exemption was approved for a period not to exceed 45 days.
- On April 29, 2022, the NRC approved a request, as supplemented, for exemption from 10 CFR 26.205 for Watts Bar Nuclear Plant, Unit 2 (ML22117A185 and ML22117A186). Watts Bar is cited as precedent because the exemption was needed due to an extended outage. The exemption allowed use of the less restrictive working hour limitations described in 10 CFR 26.205(d)(4) to support outage activities for a period not to exceed 60 days.

- On March 20, 2025, the NRC approved a request for exemption from 10 CFR 26.205 for Sequoyah Nuclear Plant, Unit 2 (ML25070A295 and ML25070A296). Sequoyah is cited as precedent because the exemption was needed due to an extended outage. The exemption allowed use of the less restrictive working hour limitations described in 10 CFR 26.205(d)(4) to support startup activities for a period not to exceed 21 days.
- On October 24, 2025, the NRC approved a request, as supplemented, for exemption from 10 CFR 26.205 for Palisades Nuclear Plant (PNP) (ML25293A005 and ML25293A007). PNP is cited as precedent the exemption was needed to support plant restart. The exemption is currently in effect and allows use of the less restrictive working hour limitations described in 10 CFR 26.205(d)(4) and (d)(5) to support the ongoing outage and restart activities. The current exemption period commenced on November 3, 2025 for a period not to exceed 60 days and will expire on January 1, 2026.

REFERENCES

1. Holtec Palisades, LLC (Holtec Palisades) letter to U.S. Nuclear Regulatory Commission (NRC), *Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours,"* dated August 12, 2025 (ADAMS Accession No. ML25224A206)
2. NRC letter to Holtec Palisades, *Palisades Nuclear Plant – One-Time Exemption from the Requirements of 10 CFR 26.205(d)(3) and (d)(7) (EPID L-2025-LLE-0022)*, dated October 24, 2025 (ADAMS Accession Nos. ML25293A005 and ML25293A007)

Enclosure Attachment 1

PNP 2025-081

**Palisades Nuclear Plant
Environmental Assessment**

Palisades Nuclear Plant Environmental Assessment

In accordance with Title 10 of the Code of Federal Regulations (10 CFR), Part 26.9, *Specific exemptions*, Palisades Energy, LLC (Palisades Energy) is requesting a second one-time exemption for the Palisades Nuclear Plant (PNP) from the specific requirements of 10 CFR 26.202, *Fitness for Duty Programs – Work Hours*, Section (d)(7). The requirements of 10 CFR 26.205(d)(4) permit the use of less restrictive work hour limitations during the first 60 days of a unit outage, in lieu of the requirements of 10 CFR 26.205(d)(7). The proposed exemption would allow the use of the less restrictive work hour limitations described in 10 CFR 26.205(d)(4) for an additional 60 days to support the remaining outage activities for restart of PNP. The period of the proposed exemption would commence on January 2, 2026.

As required by 10 CFR 51.41, *Requirement to submit environmental information*, Palisades Energy hereby provides the following environmental assessment for the proposed exemption. This environmental assessment is consistent with those provided in similar, previous exemption requests, including the examples provided in References 1, 2, 3, and 4, which were approved by the NRC in References 5, 6, 7, and 8. The proposed exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(25), as supported by the assessment below. Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is required to be prepared in connection with granting the exemption.

1. Describe any change to the types, characteristics, or quantities of non-radiological effluents discharged to the environment as a result of the proposed exemption.

Palisades Response:

There are no expected changes in the types, characteristics, or quantities of non-radiological effluents discharged to the environment as a result of the proposed exemption. The proposed exemption is administrative in nature and is limited to changing the timeframe when less restrictive hours can be worked. This does not result in any changes to the design basis requirements for the structures, systems, and components (SSCs) at PNP that function to limit the release of non-radiological effluents during and following postulated accidents. The SSCs associated with limiting the release of non-radiological effluents to the environment will continue to perform or be capable of performing their functions, and as a result, there is no significant non-radiological effluent impact. In light of the administrative nature of the proposed exemption, there are no materials or chemicals introduced into the plant that could affect the characteristics or types of non-radiological effluents. In addition, the method of operation of non-radiological waste systems will not be affected by the proposed exemption.

2. Describe any changes to liquid radioactive effluents discharged as a result of the proposed exemption.

Palisades Response:

There are no expected changes to liquid radioactive effluents discharged as a result of the proposed exemption. The proposed exemption is limited to administrative changes regarding the timeframe when less restrictive work hours can be worked and will not result in the production of any different quantity or type of radioactive material in the primary coolant system.

The proposed exemption will not result in changes to the design basis requirements for the SSCs at PNP that function to limit the release of liquid radiological effluents during and following postulated accidents. The SSCs associated with limiting the release of liquid radiological effluents will continue to perform or be capable of performing their functions, and as a result, there is no significant liquid radiological effluent impact.

3. *Describe any changes to gaseous radioactive effluents discharged as a result of the proposed exemption.*

Palisades Response:

There are no expected changes to gaseous radioactive effluents discharged as a result of the proposed exemption. The proposed administrative changes to the timeframe when less restrictive work hours can be worked will not result in the production of any different quantity or type of radioactive material in the primary coolant system. Further, these changes will not result in changes to the design basis requirements for SSCs at PNP that function to limit the release of gaseous radiological effluents during and following accidents. The SSCs associated with limiting the release of gaseous radiological effluents will continue to perform or be capable of performing their functions, and as a result, there is no significant gaseous radiological effluent impact.

4. *Describe any change in the type or quantity of solid radioactive waste generated as a result of the proposed exemption.*

Palisades Response:

There are no expected changes to the solid radioactive waste generated by the facility as a result of the proposed exemption. The proposed administrative changes to the timeframe when less restrictive work hours can be worked have no impact on the processing, storage, or shipping of radwaste and will not result in the production of any different quantity or type of solid radioactive waste during and following postulated accidents. In addition, radiation surveys will continue to be performed in accordance with plant radiation protection procedures. The SSCs associated with limiting the release of solid radioactive waste will continue to perform or be capable of performing their functions, and as a result, there is no significant solid radioactive waste impact.

5. *What is the expected change in occupational dose as a result of the proposed exemption under normal and design basis accident conditions?*

Palisades Response:

The proposed exemption will allow less restrictive work hours for a limited period. The exemption will not increase or decrease the amount of work activities that must be completed in preparation for plant restart. As such, no change in occupational dose as a result of the proposed exemption under normal or design basis accident (DBA) conditions is expected.

6. What is the expected change in the public dose as a result of the proposed exemption under normal and design basis accident conditions?

Palisades Response:

Public dose is not changed by the proposed exemption for normal operations or DBA conditions. As noted in items 2, 3, and 4 above, there is no basis to contemplate an increased source of liquid, gaseous, or solid radiological effluents, or an associated leak rate that could contribute to increased public exposure during normal or DBA conditions.

7. What is the impact to land disturbance for the proposed exemption?

Palisades Response:

The proposed exemption will allow less restrictive work hours for a limited period. As such, the proposed exemption is administrative in nature and will not result in a land disturbance or affect a historical site.

Conclusion:

There is no significant radiological environmental impact associated with implementing less restrictive work hours for a limited period. The proposed changes will not result in a land disturbance or affect any historical sites, nor will they affect non-radiological plant effluents.

References:

1. Holtec Palisades, LLC (Holtec Palisades) letter to U.S. Nuclear Regulatory Commission (NRC), *Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours,"* dated August 12, 2025 (ADAMS Accession No. ML25224A206)
2. Tennessee Valley Authority (TVA) letter to NRC, *Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours,"* dated February 5, 2025 (ADAMS Accession No. ML25036A070)
3. TVA letter to NRC, *Request for Exemption from Requirements of 10 CFR 26.205(d)(4), 26.205(d)(6) and 26.205(d)(7), "Fitness for Duty Programs – Work Hours,"* dated April 15, 2022 (ADAMS Accession No. ML22105A579)
4. Omaha Public Power District (OPPD) letter to NRC, *Request for Exemption from Requirements of 10 CFR 26.205(d)(7),* dated August 16, 2013 (ADAMS Accession No. ML13231A018)
5. NRC letter to Holtec Palisades, *Palisades Nuclear Plant – One-Time Exemption from the Requirements of 10 CFR 26.205(d)(3) and (d)(7) (EPID L-2025-LLE-0022),* dated October 24, 2025 (ADAMS Accession Nos. ML25293A005 and ML25293A007)
6. NRC letter to TVA, *Sequoyah Nuclear Plant, Unit 2 – One-Time Exemption from the Requirements of 10 CFR 26.205(d)(7) (EPID L-2025-LLE-0007),* dated March 20, 2025 (ADAMS Accession Nos. ML25070A295 and ML25070A296)

7. NRC letter to TVA, *Watts Bar Nuclear Plant, Unit 2 – Exemptions from the Requirements of 10 CFR Part 26, Section 26.205(d)(7)*, dated April 29, 2022 (ADAMS Accession No. ML22117A185)
8. NRC letter to OPPD, *Fort Calhoun Station, Unit No. 1 – Exemption from the Requirements of 10 CFR Part 26, Section 205 (TAC NO. ME9770)*, dated June 11, 2013 (ADAMS Accession Nos. ML13157A135 and ML13157A139)

Enclosure Attachment 2
PNP 2025-081
List of Regulatory Commitments

(1 Page Follows)

List of Regulatory Commitments

The table below identifies actions discussed in this letter for which, upon approval, Holtec commits to perform. Any other actions discussed in this submittal are described for U.S. Nuclear Regulatory Commission (NRC) information and are **not** commitments.

Commitment	Proposed Completion Date
1. Palisades Energy will ensure that no individual covered by 10 CFR 26.4(a)(2) [Health Physics and Chemistry] and (a)(4) [Maintenance and Projects] works more than 50 hours per week averaged over the two-week period prior to the effective date of the exemption.	01/01/2026