



SMR, LLC. A Holtec International Company  
Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104  
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December 31, 2025

Request for Limited Work Authorization  
10 CFR 50.10(d)

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

**Subject: Submittal of Pioneer Units 1 and 2 Limited Work Authorization Application  
(Project No. 99902049)**

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) 50.10, "License required; limited work authorization," SMR, LLC (SMR), on behalf of Palisades SMR, LLC, hereby submits the enclosed application requesting the U.S. Nuclear Regulatory Commission (NRC) review and approve a limited work authorization (LWA) to begin construction of a dual-unit SMR-300 plant located at the Palisades Energy Center (PEC) in Covert, Michigan. The units are individually named Pioneer Unit 1 and Pioneer Unit 2.

This submittal is the first part (Part 1) of an application for a construction permit for a utilization facility under 10 CFR Part 50 to authorize the construction of a dual-unit SMR-300 plant, consisting of two individual SMR-300 small modular reactors. This Part 1 includes a request for an LWA, an exemption from 10 CFR 50.10(d) to authorize certain construction activities prior to issuance of a full construction permit, an exemption from 10 CFR 50.10(c) to allow permanent installation of retaining walls, and an exemption from 10 CFR 50.33(f)(1) and 10 CFR Part 50 requirements to identify specific sources of funding at this stage of the project. Part 2 will include the remaining information to support issuance of the construction permit and will be filed no later than 18 months after this Part 1 submittal.

Enclosure I describes, with applicable proprietary information redacted, the planned activities to be performed for this project as well as the general and financial information required by 10 CFR 2.101(a)(9).

Enclosure II contains, with applicable proprietary information redacted, a preliminary safety analysis report (PSAR) describing relevant structures, systems, and components. The PSAR also includes a discussion of construction hazards to the operating Palisades Nuclear Plant at the PEC.

Enclosure III contains a comprehensive Environmental Report (ER) that meets the requirements of 10 CFR 51.49(f) and 10 CFR 51.50(a). The comprehensive ER addresses the environmental impacts associated with LWA activities (including requested exemptions), the remainder of construction to complete the plant, and plant operations.

Enclosure IV contains three exemption requests. These requests address aspects related to the scope of construction to be performed prior to obtaining full construction permit approval, installation of permanent retaining walls prior to obtaining LWA approval, and identification of specific sources of construction funding.

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**Enclosure VI contains information to be withheld from public disclosure under 10 CFR 2.390. Upon removal of Enclosure VI, this letter is uncontrolled.**



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Enclosure V captures the proposed license condition that is provided to support communication of the funding sources for the project.

Enclosure VI contains confidential and business proprietary information that was redacted from Enclosures 1 and 2. SMR requests that this information be withheld from public disclosure pursuant to 10 CFR 2.390, as described in the affidavit provided in Attachment A to this letter.

Enclosure VII provides information related to the quality assurance requirements associated with the project.

Enclosure VIII contains a site redress plan.

SMR requests approval of the proposed LWA application by December 31, 2026. SMR requests that the exemption request against 10 CFR 50.10(d)(1) (to install additional structures under the LWA) as well as the exemption request against 10 CFR 50.33(f)(1) and 10 CFR 50, Appendix C (regarding identification of specific sources of construction funds) be reviewed and approved concurrently with the LWA application. Separately, SMR requests a 6-month review schedule for the exemption request in Enclosure IV against 10 CFR 50.10(c) (to install permanent excavation supports prior to LWA approval). Upon receiving NRC approval, SMR will commence the construction activities described in the LWA application.

If you have questions regarding this submittal, please contact Phil Lashley, SMR Director of Licensing, at (856) 559-3783.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 31, 2025.

Respectfully,

Jean Fleming  
Vice President of Licensing and Regulatory Affairs  
Holtec International



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Attachments:

- A. Affidavit Pursuant to 10 CFR 2.390

Enclosures:

- I. General and Financial Information
- II. Preliminary Safety Analysis Report (PSAR)
- III. Environmental Report (ER)
- IV. Exemptions
- V. Proposed License Conditions
- VI. Withheld Information
- VII. Quality Assurance Program Description
- VIII. Redress Plan

CC:

- K. Trice (SMR, LLC, President)
- J. Hawkins (SMR, LLC, Executive Director of SMR)
- P. Lashley (SMR, LLC, Director of Licensing)
- M. Hayes (USNRC, DNRL, NLIB, Branch Chief)
- V. Huckabay (USNRC, DNRL, NLIB, Senior Project Manager)
- D. Barnhurst (USNRC, REFS, ENRB, Branch Chief)
- R. Hoffman (USNRC, REFS, ENRB, Environmental Project Manager)