



PNP 2026-001

10 CFR 26.9

January 5, 2026

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: Revision to Start Date for Second Exemption from Requirements of  
10 CFR 26.205, "Fitness for Duty Programs – Work Hours"

By letter dated August 12, 2025 (Reference 1), Palisades Energy, LLC (Palisades Energy) requested U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the specific requirements of Title 10 of the Code of Federal Regulations (10 CFR), 10 CFR 26.205, Fitness for Duty Programs, *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). The NRC granted the exemption on October 24, 2025 (Reference 3).

By letter dated December 12, 2025 (Reference 4), Palisades Energy requested a 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. 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].

On December 22, 2025 (Reference 5), Palisades Energy received a Request for Additional Information (RAI) by electronic mail (email) regarding the second exemption request. Palisades Energy provided the responses to the RAI on December 26, 2025 (Reference 6), and this was followed with a supplement to the RAI responses on December 31, 2025 (Reference 7).

On January 2, 2026, the NRC notified Palisades Energy that it expected to approve and issue the second 60-day exemption on January 5, 2026. Palisades Energy had previously proposed that the 60-day exemption commence on January 2, 2026. To align with the expected issuance date of the exemption, it was suggested that the start date for the 60-day exemption period be moved from January 2 to January 6, 2026.

Accordingly, Palisades Energy hereby requests that the second exemption allow use of the less restrictive outage work hour controls in 10 CFR 26.205(d)(4) for a period not to exceed 60 days,

commencing on January 6, 2026 and ending on March 6, 2026. Note that this exemption period revises and supersedes the exemption period proposed in the December 12, 2025 exemption request (Reference 4) and its supplements (References 6 and 7).

This letter identifies no new regulatory commitments and no revisions to existing regulatory commitments.

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

Respectfully,

Jean A.  
Fleming

Digitally signed by Jean A. Fleming  
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Jean A. Fleming  
Vice President, Licensing and Regulatory Assurance  
Holtec International

- 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)
  4. Holtec Palisades letter to NRC, *Second Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours,"* dated December 12, 2025 (ADAMS Accession No. ML25346A199)
  5. NRC email to Holtec Palisades, *Request for Additional Information RE: Request for Second Exemption from Part 26 Work Hours (LL-2025-LLE-0032),* dated December 22, 2025 (ADAMS Accession No. ML25357A221)
  6. Holtec Palisades letter to NRC, *Request for Additional Information Regarding Second Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours,"* dated December 26, 2025 (ADAMS Accession No. ML25360A002)

7. Holtec Palisades letter to NRC, *Supplement to Request for Additional Information Regarding Second Request for Exemption from Requirements of 10 CFR 26.205, "Fitness for Duty Programs – Work Hours,"* dated December 31, 2025 (ADAMS Accession No. ML25365A936)

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