



PNP 2026-005

10 CFR 50.55a

February 2, 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: Response to NRC Clarification Questions Regarding Relief Request RR 5-11, *Proposed Alternative to ASME Section XI Code Requirements for Primary Coolant System Piping Branch Connection Modifications*

Pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.55a, *Codes and standards*, Holtec Palisades hereby provides the response to the Nuclear Regulatory Commission (NRC) Clarification Questions. This request is regarding the revised Relief Request RR 5-11 for the Palisades Nuclear Plant (PNP) dated August 20, 2025 (ADAMS Accession Number ML25232A168).

The Attachment to this letter provides the NRC Questions and the Holtec Palisades Responses.

This letter contains no new regulatory commitment.

Please refer any questions regarding this submittal to Kami Miller – Manager, Regulatory Assurance & Emergency Preparedness, at (269) 764-2375.

Respectfully,

Jean A.  
Fleming

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Jean A. Fleming  
Vice President, Licensing and Regulatory Assurance  
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Attachment: Response to NRC Clarification Questions Regarding RR 5-11, *Proposed Alternative to ASME Section XI Code Requirements for Primary Coolant System Piping Branch Connection Modifications*

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

**ATTACHMENT**

**Response to NRC Clarification Questions Regarding RR 5-11,  
*Proposed Alternative to ASME Section XI Code Requirements  
for Primary Coolant System Piping Branch Connection Modifications***

**NRC Question**

1. In the initial version of the relief request (ML25232A168 from 8/20) the request references ASME Code Case N-770, Version 7 (N-770-7). However, the RAI response and the supplement (ML25353A329 from 12/19 and ML25364A158 from 12/30) reference Version 5 of Code Case N-770 (N-770-7[5]). Please clarify which version of the code case Palisades Energy intends to implement at Palisades.

**Palisades Response to Question 1:**

The revision level of N-770 applicable at the time of the Preservice Examinations is -5 (i.e., N-770-5). Volumetric examinations of the weld metal buildups were performed with procedures meeting the requirements of Code Case N-770-5. Per 10CFR50.55a, Code Case N-770-5 was permitted to be used no later than one year after September 30, 2024. The BCWMB examinations were performed prior to September 29, 2025. Therefore, Code Case N-770-5 was acceptable at the time of the examinations.

**NRC Question**

2. The NRC staff understands that the discussion of the inservice examination plans for the Primary Coolant System Piping Branch Connection Modifications was largely removed from the supplement to RR 5-11 and will be addressed in a later submittal. However, the staff would like to confirm whether the licensee intends to continue using ASME Code Case N-853-1 during this interim period, or whether some other program or protocol is being followed.

**Palisades Response to Question 2:**

Holtec will continue using ASME Code Case N-853-1 during the interim period until a Relief Request for the Inservice Inspection plan for the Primary Coolant System Piping Branch Connection Modifications is submitted.