



PNP 2026-032

10 CFR50.55a

April 27, 2026

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

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

Subject: Revised Response to Request for Additional Information Regarding Relief Request 5-14, Proposed Alternative Requirements for the Pressurizer Spray Nozzle to Safe End and Safety Nozzles RV-1039 and RV-1040 to Flange Welds

Pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.55a, *Codes and standards*, Holtec Palisades hereby provides a revised response to Nuclear Regulatory Commission (NRC) Request for Additional Information (RAIs) dated April 11, 2026 (EPID: L-2026-LLR-0011). This RAI is regarding the Palisades submittal of Relief Request Number RR 5-14 dated February 20, 2026 (ML26051A112) (Reference).

PNP ceased operation in the Spring of 2022. Holtec Palisades is performing modifications to the Plant to support restart of plant operations. The Palisades Pressurizer nozzle welds are fabricated from materials that are susceptible to Primary Water Stress Corrosion Cracking (PWSCC). There exists the potential that flaws may develop in these unmitigated welds and result in leakage.

Holtec preemptively mitigated Alloy 82/Alloy 182/Alloy 600 materials in the pressurizer spray nozzle-to-safe end weld and two pressurizer safety nozzle-to-flange welds. The Alloy 82/Alloy 182 welds and Alloy 600 safe end attached to the Spray Nozzle as well as the Safety Nozzles RV-1039 and RV-1040 flanges were replaced with austenitic stainless steel materials.

Palisades is requesting relief under 10 CFR 50.55a (z)(1) from the post weld heat treatment (PWHT) requirements of ASME Code Section III, Subsection NB, Paragraph NB-2211, specifically in that during the review of the previous PWHT hours for the welds listed in Section 1.0 of the original submittal (Reference), it has been determined that the historical records for these welds could not be located and therefore, the number of PWHT hours that were initially applied to these welds cannot be determined exactly.

The Attachment to this letter provides the NRC Request for Additional Information as well as the Palisades revised response to the NRC's question.

This letter contains no new regulatory commitments.

Please refer any questions regarding this submittal to Kami Miller – Director, Regulatory at (269) 764-2375.

Sincerely,

Jean A.  
Fleming

Digitally signed by Jean A. Fleming  
DN: cn=Jean A. Fleming, c=US,  
o=Holtec Decommissioning  
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Date: 2026.04.27 08:33:29 -0400

Jean A. Fleming  
Vice President of Licensing and Regulatory Affairs  
Holtec International

Reference:

Relief Request Number RR 5-14, Proposed Alternative Requirements for the Pressurizer Spray Nozzle to Safe End and Safety Nozzles RV-1039 and RV-1040 to Flange Welds (ML26051A112)

Attachment:

Revised Response to NRC RAIs Regarding Relief Request RR-5-14, Proposed Alternative Requirements for the Pressurizer Spray Nozzle to Safe End and Safety Nozzles RV-1039 and RV-1040 to Flange Welds

cc: NRC Region III Administrator  
NRC Senior Resident Inspector, PNP  
NRC Project Manager, PNP

## **ATTACHMENT**

Palisades Nuclear Power Plant  
Docket No. 50-255/Renewed License No. DPR-20

Revised Response to Request for Additional Information (RAI) Regarding Relief Request RR-5-14, Proposed Alternative Requirements for the Pressurizer Spray Nozzle to Safe End and Safety Nozzles RV-1039 and RV-1040 to Flange Welds

**NRC RAI -**

By letter dated February 20, 2026, Relief Request 5-14 (Reference 1) (ADAMS Accession No. ML26051A112), Palisades is requesting relief under 10 CFR 50.55a (z)(1) from the post weld heat treatment (PWHT) requirements of ASME Code Section III, Subsection NB, Paragraph NB-2211, specifically in that during the review of the previous PWHT hours for the welds listed in Section 1.0 of the submittal, it has been determined that the historical records for these welds could not be located and therefore, the number of PWHT hours that were initially applied to these welds could not be determined exactly.

Below is the NRC request for additional information question followed by the Palisades response.

**NRC Question – Verification of Material Traceability for Heat No. BT2615**

In Section 6.1 of the submittal, the licensee states that the chemical composition of both the representative (sample) heat and the three as-installed nozzles (the spray nozzle and both safety nozzles) (Heat No. BT2615) meet the requirements of ASTM A508-64, Class II material. However, the submittal does not explicitly describe the methodology used to confirm that all three nozzles originate from this specific heat number.

To support the NRC staff's evaluation of material applicability and the validity of the surrogate data used in the relief request, please provide the following:

Confirm the method used to verify Heat Number BT2615 as applicable to all three nozzles. Specifically, identify if this was confirmed via:

- a) Direct physical stamping or marking on each of the three individual nozzle forgings;  
or
- b) An alternative material traceability method (e.g., original vessel "as-built" records, shop fabrication maps, or specific CMTR associations).

If an alternative traceability method was used, please explain the process and identify the specific records that establish the link between Heat No. BT2615 and the three physical as-installed components.

This confirmatory information is required to make the determination that the proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(z)(1).

**Palisades Revised Response to the NRC RAI –**

The nozzles do not exhibit any physical stamping or marking with the material heat number therefore, material traceability was established via vessel 'as-built' records.

The 'as-built' record used to establish the Heat Numbers for the nozzles was Palisades Drawing Number VEN-M1-LA, Sheet 965, Rev. 4 (M0001LA-0965), "Material Identification Pressurizer." This Drawing contains a table that lists the pressurizer nozzles and safe ends and the heat numbers for each. The Top of the drawing provides a layout of the pressurizer and location of each nozzle and safe end attachment. The bottom of the drawing provides the table that is the basis for the statement made in Section 6.1 of Attachment 2 in Reference [ 2 ].

The drawing identifies Safety Nozzle RV-1040 as PC No. 986-12 C, and the Table identifies the associated material Heat Number as BT 2615.

The drawing identifies Safety Nozzle RV-1039 as PC No. 986-12 D, and the Table identifies the associated material Heat Number as BT 2615.

and

The drawing identifies the Spray Nozzle as PC No. 986-02, and the Table identifies the associated material Heat Number as BT 2615.

## REFERENCES

1. Relief Request Input for PWHT of Pressurizer Spray Nozzle and Safety Nozzles RV-1039 and RV-1040
2. Holtec Palisades letter dated February 20, 2026, "Relief Request RR 5-14, Proposed Alternative Requirements for the Pressurizer Spray Nozzle to Safe End and Safety Nozzles RV-1039 and RV-1040 to Flange Welds" (ADAMS Accession No. ML26051A112)