



PNP 2026-036

10 CFR 26.9

May 27, 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: One-Time Request for Exemption from Requirements of 10 CFR 26.3(a),
"Fitness For Duty Programs - Scope"

Pursuant to 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) is requesting U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the specific requirements of 10 CFR 26.3(a), *Scope*.

The Enclosure to this letter provides Palisades Energy's request for exemption from the specific requirements of 10 CFR 26.3(a). Attachment 1 to the Enclosure provides the Environmental Assessment supporting the exemption request. Attachment 2 to the Enclosure contains three new commitments regarding the controls on work hours to manage cumulative worker fatigue.

Palisades Energy requests approval of the exemption request no later than June 4, 2026, to support the ongoing activities that are critical for the successful restart of Palisades Nuclear Plant (PNP).

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

Respectfully,

Michael Schultheis
 Digitally signed by Michael Schultheis
DN: cn=Michael Schultheis, c=US,
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Reason: I am approving this document
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Michael Schultheis
Site Vice President
Holtec Palisades

References: 1. NRC letter to Holtec Palisades, Palisades Nuclear Plant – *One-Time Exemption from the Requirements of 10 CFR 26.205(d)* (EPID L-2026-LLE-0010), dated March 13, 2026 (ADAMS Accession No. ML 26065A011)

Enclosure: One-Time Request for Exemption from Requirements of 10 CFR 26.3(a)

- 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 2026-036

Enclosure

One-Time Request for Exemption from Requirements of 10 CFR 26.3(a)

One-Time Request for Exemption from Requirements of 10 CFR 26.3(a)

SUMMARY

By letter dated March 13, 2026 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) approved a one-time exemption from the specific requirements of 10 CFR 26.205, *Work hours*. The exemption allowed use of the less restrictive outage work hour controls in 10 CFR 26.205(d)(4) for a third 60-day period. The exemption applied only 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].

Following approval of the previous exemption, Palisades Energy re-evaluated the duration necessary to support the remaining PNP outage and restart activities and determined that an additional exemption period is required to continue implementation of the less restrictive work hour limitations of 10 CFR 26.205(d)(4). The requested exemption period will provide necessary flexibility in scheduling covered work activities and personnel resources during the final stages of pre-fuel-load restart work. This flexibility supports effective management of cumulative worker fatigue while allowing critical restoration, testing, and configuration activities to be completed safely and efficiently. Consistent with the intent of the fatigue management requirements, the proposed exemption supports maintaining the ability of covered individuals to perform their duties safely, competently, and with appropriate attention to human performance considerations.

Initial fuel loading is currently scheduled for September 2026.

APPLICABLE 10 CFR 26 REQUIREMENTS

10 CFR 26.3(a) provides the following requirements:

Licensees who are authorized to operate a nuclear power reactor under 10 CFR 50.57, and holders of a combined license under 10 CFR Part 52 after the Commission has made the finding under 10 CFR 52.103(g) shall comply with the requirements of this part, except for subpart K of this part. Licensees who receive their authorization to operate a nuclear power reactor under 10 CFR 50.57 after the date of publication of this final rule in the Federal Register and holders of a combined license under 10 CFR Part 52 after the Commission has made the finding under 10 CFR 52.103(g) shall implement the FFD program before the receipt of special nuclear material in the form of fuel assemblies.

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

Pursuant to 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) is requesting U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the specific requirements of 10 CFR 26.3(a), *Scope*.

In lieu of requesting successive exemptions from the work hour controls specified in 10 CFR 26.205, Palisades Energy hereby requests a one-time schedular exemption from 10 CFR 26.3(a), *Scope*, for the duration of restart activities. The requested schedular exemption would apply only during the period prior to implementation of full compliance with 10 CFR Part 26, including Subpart I, *Managing Fatigue*.

The proposed exemption period date of commencement is June 7, 2026, and would apply to personnel performing duties described in 10 CFR 26.4(a)(1) [Operations], (2) [Health Physics and Chemistry], (3) [Fire Brigade], and (4) [Maintenance and Projects].

The proposed exemption request would not apply to personnel performing duties described in 10 CFR 26.4(5) [Security]. The covered individuals in this group will continue to comply with the requirements described in 10 CFR 26.205(d)(7), *average work hours*, for the duration of the exemption period.

The proposed exemption period would be limited to pre-fuel-load activities and would terminate

9 calendar days prior to fuel load, at which point PNP would transition to full compliance with 10 CFR 26, including subpart I.

Basis for the 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.

Reason Behind the Proposed Exemption

The remaining work activities necessary to support safe restart of PNP involve complex equipment restoration, integrated testing, configuration management, and emergent corrective maintenance activities that are inherently difficult to schedule with precision. Although Palisades Energy continues to actively manage and monitor the restart schedule, the exact duration necessary to safely complete the remaining pre-fuel-load activities cannot be accurately predicted due to the potential for emergent conditions identified during testing, equipment restoration, inspections, troubleshooting, post-maintenance testing, and system turnover activities.

The major remaining work scopes prior to fuel load include instrument air compressor replacement, main feed pump turbine rotor replacement, fuel handling system upgrades, switchyard restoration activities, and valve maintenance and restoration work. These activities involve coordination across multiple organizations and frequently require discovery and resolution of previously unidentified conditions as work progresses. In addition, completion of one activity often establishes prerequisites for subsequent testing or restoration activities, resulting in schedule uncertainty that cannot be fully resolved in advance.

Palisades Energy has determined that maintaining limited flexibility under the less restrictive outage work hour controls of 10 CFR 26.205(d)(4) is necessary to safely complete the remaining restart work and respond appropriately to emergent conditions without introducing unnecessary schedule-driven risk. Imposing more restrictive online work hour limitations during this period could require additional personnel turnover, reduced schedule continuity, or

reassignment of experienced workers during critical restoration and testing activities. These conditions could adversely affect human performance, configuration control, work coordination, and troubleshooting effectiveness during final plant restoration activities.

Justification for the Proposed Exemption

The proposed exemption will not endanger life or property because the requested exemption period is limited to pre-fuel-load restart activities while the reactor remains defueled and the plant is not operating in a licensed operating mode. During the requested exemption period, there will be no fuel loaded in the reactor vessel and therefore, no risk associated with reactor

criticality, power operation, or fuel damage resulting from reactor operations.

The remaining activities to be completed during the exemption period are primarily maintenance, restoration, modification, testing, and equipment turnover activities conducted under outage conditions. Although these activities continue to require appropriate human performance and supervisory controls, the plant condition during the requested exemption period presents substantially lower nuclear safety risk than fueled or operating conditions.

In addition, Palisades Energy will continue to maintain the fatigue management controls required by 10 CFR 26.205(d)(1), (d)(2), and 10 CFR 26.205(d)(4), including limits on maximum work hours, minimum break requirements, and minimum days off requirements applicable to outage activities. Covered individuals will continue to be monitored for fatigue, supervisors will continue to assess worker fitness and alertness, and workers will remain subject to the self-declaration requirements and fatigue assessment provisions of the site Fitness-for-Duty program.

The requested exemption is also limited in scope. Security personnel will continue to comply with the standard online work hour requirements and are excluded from the exemption request. In addition, the exemption will terminate 9 calendar days prior to initial fuel loading, ensuring that standard work hour controls be restored before the higher-risk period associated with fuel movement, reactor startup, and approach to criticality.

Granting the proposed exemption is in the public interest because it supports the safe and orderly completion of remaining pre-fuel-load restart activities while maintaining appropriate fatigue management controls and experienced work teams. The requested scheduling flexibility supports continuity of work activities and allows plant management to more effectively manage cumulative fatigue during the final stages of restart preparation.

Accordingly, Palisades Energy concludes that the proposed exemption is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest.

MITIGATING STRATEGY

Management of Acute and Cumulative Fatigue During Restart Activities

Palisades Energy will reasonably manage acute and cumulative fatigue during the restart period through administrative controls, supervisory oversight, work management processes, and fitness for duty program implementation. Fatigue management actions will include:

- Continued compliance with 10 CFR 26.205(d)(1), (d)(2), and (d)(4) for all covered individuals through the utilization of the Certrec Fatigue Rule Management System (FRMS), thus ensuring Fatigue Management Program implementation;
- Scheduling practices intended to provide reasonable opportunities for restorative sleep;
- Monitoring of extended work durations, consecutive workdays, and shift rotations;

- Periodic management assessment of organizational workload and staffing adequacy;
- Use of additional qualified personnel and supplemental resources, as necessary;
- Evaluation of fatigue-related concerns entered into the corrective action program (CAP).
- Continued use of established procedures and programs including:
 - RA-023, Fatigue Management Program
 - RA-202, Personnel Expectations Related to Fatigue Management
 - SEC-407, Fitness For Duty Program
 - PI-001, Corrective Action Program

Behavioral Observation Program Enhancements

During the proposed exemption period, Palisades Energy will enhance implementation of the behavioral observation program to compensate for the temporary absence of work hour controls under certain portions of 10 CFR 26 Subpart I. Enhancements will include:

- A commitment to dedicate a portion of weekly supervisory observations to fatigue awareness, fatigue indicators, fitness-for-duty behaviors, and worker readiness;
- Increased supervisory and management engagement in the field;
- Reinforcement of individual responsibility to identify and report signs of fatigue;
- Reinforcement of stop-work authority and conservative decision making;

When fatigue concerns are identified, supervisors will take appropriate actions commensurate with the observed condition. Such actions may include additional monitoring, temporary work restrictions, removal from safety-significant activities, schedule modification, or time off to obtain restorative sleep prior to returning to duty.

Scheduling

Palisades Energy will continue to maintain work hours for covered individuals as low as reasonably achievable. Work hours will only increase for each group when it becomes necessary to complete work activities in support of restart.

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 because the exemption was needed to support plant restart. The exemption allowed 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 exemption period commenced on November 3, 2025 for a period not to exceed 60 days and expired on January 1, 2026.
- On January 5, 2026, the NRC approved a request for exemption from 10 CFR 26.205 for PNP (ML26002A075 and ML26002A077). PNP is cited as precedent because this was a second exemption needed to support plant restart. The exemption allowed 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 exemption period commenced on January 6, 2026, for a period not to exceed 60 days and expired on March 6, 2026.

- On March 13, 2026, the NRC approved a request for exemption from 10 CFR 26.205 for PNP (ML26065A011). PNP is cited as precedent because this was a third exemption needed to support plant restart. The exemption allowed 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 exemption period commenced on various dates based on work group, for a period not to exceed 60 days and will expire on June 2, 2026.
- On December 21, 2021, The NRC approved a request for exemption from specific requirements of 10 CFR 26.3 "Scope", for Vogtle Electric Generating Plant, Units 3 and 4 (ML21334A417). Vogtle is cited as precedent because it authorized the exemption of specific requirements of 10 CFR 26.3 before fuel loading.

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)

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Enclosure Attachment 1
Palisades Nuclear Plant
Environmental Assessment

Palisades Nuclear Plant Environmental Assessment

Pursuant to 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) is requesting U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the specific requirements of 10 CFR 26.3(a), *Scope*.

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, 4, and 5 which were approved by the NRC in References 6, 7, 8, 9, and 10. 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), *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)
2. Holtec Palisades letter to 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)
3. 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)
4. 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)
5. 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)
6. NRC letter to Holtec Palisades, *Palisades Nuclear Plant – One-Time Exemption from the Requirements of 10 CFR 26.205(d),* dated January 5, 2026 (ADAMS Accession No. ML26002A075 and ML26002A077)
7. 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)
8. 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)

9. 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)
10. 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)

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Enclosure Attachment 2
List of Regulatory Commitments

The table below identifies actions discussed in this letter for which, upon approval, Palisades Energy 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 all covered individuals remain subject to the requirements described in 10 CFR 26.205(d)(1), (2), and (4) for the duration of the exemption period.	09/30/2026
2. Palisades Energy will ensure that all covered individuals will transition to full compliance with 10 CFR 26, including Subpart I, 9 calendar days prior to initial fuel loading.	09/30/2026
3. Palisades Energy will ensure that a portion of weekly supervisory observations are dedicated to fatigue awareness, fatigue indicators, fitness-for-duty behaviors, and worker readiness.	09/30/2026