



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 18, 2026

MEMORANDUM TO: Michelle W. Hayes, Chief
Advanced Reactor Licensing Branch 2
Division of Advanced Reactor Licensing
Office of Advanced Reactors

FROM: Andrea Johnson, Project Manager **/RA/**
Advanced Reactor Licensing Branch 2
Division of Advanced Reactor Licensing
Office of Advanced Reactors

SUBJECT: SUMMARY OF THE APRIL 23, 2026, PUBLIC MEETING WITH
HOLTEC INTERNATIONAL COMPANY TO DISCUSS PLANNED
EXEMPTION REQUEST FOR PIONEER UNITS 1 AND 2
CONSTRUCTION PERMIT APPLICATION

Meeting Information:

Vendor: Holtec International Company (Holtec)

Docket / Project No.: 99902049

Meeting Title: Planned Exemption Request and Proposed Preliminary Safety Analysis Report
Chapters 15 and 6.2 Contents for Pioneer Units 1 and 2 Construction Permit Application

Meeting Date: April 23, 2026

Meeting Type: Observation Meeting

Public Meeting Notice Agencywide Documents Access and Management System (ADAMS)
Accession No.: [ML26103A347](#)

Meeting Attendees: See Enclosure 1 for list of meeting attendees

CONTACT: Andrea Johnson, OAR/DARL/ARLB2
(301) 415-2890

Meeting Summary:

The purpose of the meeting was for (Holtec to describe the planned exemption request related to the information required to be provided in Chapters 15 and 6.2 of the Preliminary Safety Analysis Report (PSAR) for the Pioneer Units 1 and 2 Construction Permit Application (CPA). The U.S. Nuclear Regulatory Commission (NRC) staff's feedback emphasized that the preliminary safety analysis must be sufficient to support the safety findings necessary to issue a construction permit.

The NRC staff conducted the meeting in accordance with NRC Management Directive 3.5, "Attendance at NRC Staff-Sponsored Meetings" ([ML21180A271](#)).

Holtec presented their licensing approach for the forthcoming Pioneer Units 1 and 2 construction permit applications, including a proposed exemption request from Title 10 of the *Code of Federal Regulations* (10 CFR) 50.34(a)(4) and a proposed schedule for submitting PSAR Chapters 15 and 6.2 content (ML26103A196).

NRC staff emphasized that under 10 CFR 50.35(a) the NRC is required to make a finding that the applicant has sufficiently described the principal architecture and engineering design criteria for the design and identified the major features and components incorporated therein for the protection of public health and safety. The regulations also require NRC to find that the PSAR is adequate to support a reasonable assurance finding that the facility can be constructed and operated without undue risk and that it has identified any research or testing that needs to be completed. NRC staff expressed interest in understanding the specific timing of Holtec construction needs and suggested other strategies such as an LWA amendment, a staged submittal, or possibly construction permit conditions that act as hold points. NRC staff then noted that cost and schedule benefits, while important, are common to many applicants and may not constitute special circumstances for granting exemptions.

The NRC staff highlighted the need for preliminary analyses of all safety-related systems, including emergency core cooling systems (ECCS), containment sizing, and radiological consequence assessments. They stressed the importance of including system descriptions, diagrams, and bounding analyses for all accident types (including Anticipated Operational Occurrences and Design-Basis Accident) in the PSAR. NRC staff noted that a PSAR must contain information related to system design, such as mechanical, electrical, and Instrumentation and Control (I&C) systems that will be credited in the safety analysis of Chapter 15, including their importance to safety and the safety-related functions of those systems.

Holtec confirmed that descriptions and diagrams of engineered safety features and their functionality, including heat removal and ECCS systems, will be included in the PSAR, even if final analysis results are not yet available. They noted that Holtec could provide preliminary analyses in the PSAR using industry-standard codes though the Evaluation Model Development and Assessment Process (EMDAP) would not be complete at that stage, and that Holtec could offer applicability assessments for preliminary analyses, such as pressures, temperatures, and mass fluxes, referencing legacy experiments, but not full-scale validation. Holtec further noted they can provide a preliminary maximum hypothetical accident (MHA) radiological consequence assessment in the PSAR.

NRC staff clarified that NRC regulations require a preliminary safety analysis, not a final analysis, for the construction permit. The preliminary analysis should demonstrate confidence in the design and be sufficient for permit issuance, even if the evaluation model is not fully approved. NRC staff noted that the use of industry-standard codes for preliminary analysis is acceptable and aligns with past NRC practice. NRC staff also noted that while there are different regulatory requirements for non-light-water reactors, recent non-light water reactor construction permit applications have been accepted without fully validated methodologies.

The meeting concluded with both parties agreeing to continue engagement to clarify expectations for preliminary safety analyses and methodologies.

At the end of the meeting, members of the public were invited to provide comments or ask the NRC staff questions pertaining to the scope of the meeting. No members of the public raised questions or comments during the meeting.

Enclosure:
List of Attendees

SUBJECT: SUMMARY OF THE APRIL 23, 2026, PUBLIC MEETING WITH HOLTEC INTERNATIONAL COMPANY TO DISCUSS PLANNED EXEMPTION REQUEST FOR PIONEER UNITS 1 AND 2 CONSTRUCTION PERMIT APPLICATION DATED: JUNE 18, 2026

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Memo: **ML26169A312**

**April 23, 2026, Public Meeting with Holtec International Company (Holtec) to Discuss
Planned Exemption Request and Proposed Preliminary Safety Analysis Report Chapters
15 and 6.2 Contents for Pioneer Units 1 and 2 Construction Permit Application**

Meeting Attendees

Name	Organization
Victoria Huckabay	U.S. Nuclear Regulatory Commission (NRC)
Michelle Hayes	NRC
Andrea Johnson	NRC
Candace de Messieres	NRC
John Parillo	NRC
Jake Davis	NRC
Brian McWilliams	NRC
Ravi Penmetsa	NRC
Reed Anzalone	NRC
Dr Sean Piela	NRC
Lou McKown	NRC
Syed Haider	NRC
Clay Lietwiler	NRC
Hiral Kadakia	NRC
Edward Stutzcage	NRC
Matthew Hamm	NRC
Ahsan Sallman	NRC
Mihaela Biro	NRC
Shanlai Lu	NRC
Luis Colon Fuentes	NRC
Julie Winslow	NRC
April Nguyen	NRC
Greg Oberson	NRC
Jack Bryan Minzer	NRC
Brian McWilliams	Holtec
Michael Mlynarek	Holtec
Alex Chereskin	Blue Energy
TJ Kim	Holtec
Justin Hawkins	Holtec
PJ Seel (BTI)	Member of Public
Jan Mazza	Holtec
Debu Majumdar	Holtec
Jackson Coyle	Holtec
Abrar Mohammad	Holtec
Jake Dolecki	Holtec
Stephen Wardle	ONR
Lydia Neidlinger	Blue Energy

Nicole Schlichting	Enercon
Dwayne Blaylock	Enercon
Ouellette, Paul	EPM
Charles Lyden	DOE
Jeff Mitman	Member of the public
Phil Lashley	Holtec
Monica Haneman	Holtec
Tim Parkes	ONR