



September 30, 2026

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

Docket Nos: 05000616 and 05000617

Subject: Holtec International – Submittal of the Construction Permit Application for Pioneer Units 1 and 2

References: [1] 300-USNRC123 “Submittal of Pioneer Units 1 and 2 Limited Work Authorization Application (ADAMS Accession No. ML26009A012)

[2] “Final Safety Evaluation for the ‘Topical Report on the Quality Assurance Program for Holtec International’s Small Modular Reactor (SMR) Design and Construction’ (EPID No. L-2023-TOP-0049)” (ADAMS Accession No. ML24228A060)

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, SMR, LLC is pleased to submit, on behalf of Palisades SMR, LLC the enclosed application requesting the US Nuclear Regulatory Commission (NRC) review and approve a Construction Permit (CP) for the construction of a dual-unit SMR-300 plant located at the Palisades Energy Center (PEC) in Covert, Michigan. The units are individually named Pioneer Unit 1 and Pioneer Unit 2.

By letter dated December 31, 2025 (ML26009A012), SMR, LLC, a Holtec International company, submitted the first part of a phased construction permit application to the U.S. Nuclear Regulatory Commission (NRC) for the proposed dual-unit SMR-300 facility at the Palisades Energy Center (PEC) in Covert, Michigan. This submittal is the second part (Part 2) of the construction permit application.

Enclosure I contains the proprietary version of the complete preliminary safety analysis report (PSAR) to support the CPA and Enclosure II contains the corresponding non-proprietary, redacted version. The application information has been prepared in accordance with the applicable requirements of 10 CFR Part 50 and is consistent, where applicable, with the format and content guidance provided in Regulatory Guide 1.206, “Applications for Nuclear Power Plants.”



Enclosure III contains an updated version of the Quality Assurance Topical Report that was previously approved by the NRC staff [2]. Holtec requests review of this revised topical report to support the CPA.

Enclosure IV contains a set of exemption requests which address aspects of the CPA that require exemption from the existing rules, with appropriate justification for each request.

SMR respectfully requests that the NRC docket and review this Construction Permit Application. Enclosure V is provided in support of SMR's request to withhold proprietary information from public disclosure pursuant to 10 CFR 2.390.

The Part 1 submittal [1] included the Environmental Report supporting the project, the site redress plan, and a proposed license condition related to funding sources. These items are unchanged with this Part 2 submittal. Similarly, the general and financial information submitted with the LWA is incorporated by reference into this Part 2 CP application. That information is currently under NRC review and any updates would apply equally to this application.

If you have any questions or require any additional information, please contact Kimberly Manzione, Executive Director of Licensing and Regulatory Affairs, k.manzione@holtec.com or 856-797-0900 ext. 3951.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 30, 2026.

Respectfully submitted,

Dr. Krisha P. Singh
Chairman & CEO
Holtec International



Enclosures:

- I. Pioneer Units 1 and 2 Preliminary Safety Analysis Report (Proprietary)
- II. Pioneer Units 1 and 2 Preliminary Safety Analysis Report Redacted Version (Non-Proprietary)
- III. Quality Assurance Topical Report (Non-Proprietary)
- IV. Exemption Requests (Non-Proprietary)
- V. Affidavit Pursuant to 10 CFR 2.390 to Withhold Information from Public Disclosure

CC:

- K. Manzione (Holtec, Executive Director of Licensing, Regulatory Affairs, and Environmental)
- J. Dolecki (Holtec, Senior Manager of Engineering Programs)
- S. Hanson (Holtec, Licensing Manager)
- M. Hayes (USNRC, DNRL, NLIB, Branch Chief)
- V. Huckabay (USNRC, DNRL, NLIB, Senior Project Manager)
- A. Johnson (USNRC, DNRL, NLIB, Project Manager)