

**From:** [Doell, Marlayna](#)  
**To:** [Jean Fleming](#)  
**Cc:** [Bill Noval](#); [Matthew Johnson](#); [Walter Wittich](#); [Jim Miksa](#); [Anderson, Shaun](#); [Wall, Scott](#)  
**Subject:** Palisades Nuclear Plant – Acceptance Review: Exemption Request from 10CFR50.47(b), 10 CFR 50.47(c)(2), and 10 CFR Part 50, Appendix E, Section IV [EPID: L-2022-LLE-0024]  
**Date:** Friday, August 12, 2022 11:19:00 AM

---

Dear Ms. Fleming:

By letter dated July 11, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22192A134), Holtec Decommissioning International, LLC (HDI) submitted exemption requests from portions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.47(b), 10 CFR 50.47(c)(2), and 10 CFR Part 50, Appendix E, Section IV, for the Palisades Nuclear Plant (PNP). The requested exemptions would allow HDI to reduce PNP emergency planning requirements consistent with the permanently shutdown and defueled condition of PNP.

HDI performed site specific analyses utilizing the NRC-approved methodology in Holtec Report HI-2200750, “Holtec Spent Fuel Pool Heat Up Calculation Methodology Topical Report,” to determine the end of the zirconium fire period for PNP. These site-specific analyses show that the requested Permanently Defueled Emergency Plan may be implemented with an optimized PNP spent fuel pool layout approximately 12 months after power operations ceased at PNP, which occurred on May 20, 2022. Therefore, HDI requested review and approval of the exemptions by April 29, 2023, with the approved exemptions to become effective May 31, 2023 (i.e., 12 months following the permanent shutdown of PNP).

The purpose of this e-mail is to provide the results of the NRC staff’s acceptance review of these exemption requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed exemption in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff’s ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence by November 1, 2022, and a response will be due 30 days from the receipt of the request for additional information.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately **750 hours** to complete. In addition, the staff requirements memorandum (SRM) to SECY-08-0024 requires Commission approval for any reduction in the effectiveness of a licensee’s emergency plan that requires an exemption from the requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. Therefore, the NRC staff expects to complete this review by **July 29, 2023**. If there are

emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this email will be available electronically for public inspection from the Publicly Available Records component of ADAMS. ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please contact me at (301) 415-3178 or e-mail at [Marlayna.Doell@nrc.gov](mailto:Marlayna.Doell@nrc.gov).

Thank you and have a great weekend!  
Marlayna

Marlayna Vaaler Doell

~~~~~  
Decommissioning Project Manager  
U.S. Nuclear Regulatory Commission  
NMSS/DUWP/RDB

Phone: 301.415.3178  
Mobile: 440.668.7399  
Home: 605.348.2334  
E-mail: [marlayna.doell@nrc.gov](mailto:marlayna.doell@nrc.gov)  
Office Location: Fulltime Telework  
from Rapid City, South Dakota!  
Mail Stop: T-5A10