

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: License Amendment Request to Revise Emergency Plan and Emergency Action Level Scheme (L-2022-LLA-0099)
Date: Friday, August 12, 2022 12:22:00 PM

Dear Ms. Fleming:

By letter dated July 12, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22193A090), Holtec Decommissioning International, LLC (HDI) submitted a license amendment request for Palisades Nuclear Plant (PNP) to revise the PNP Emergency Plan and Emergency Action Level (EAL) scheme for the permanently shutdown and defueled condition. The proposed changes are being submitted to the U.S. Nuclear Regulatory Commission (NRC) for approval prior to implementation, as required under Paragraph 50.54(q)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR) and 10 CFR Part 50, Appendix E, Section IV.B.2.

The proposed Permanently Defueled Emergency Plan (PDEP) and Permanently Defueled EAL scheme are commensurate with the significantly reduced risk associated with the spent fuel stored in the PNP spent fuel pool after it has sufficiently decayed such that the radiological impact of accidents is not expected to result in radioactive releases that exceed U.S. Environmental Protection Agency (EPA) Protective Action Guidelines (PAGs) beyond the site boundary. HDI requested approval of the proposed license amendment by April 29, 2023, with an effective date of May 31, 2023 (i.e., approximately 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 this amendment request. 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. Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

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 **500 hours** to complete. The proposed PDEP and Permanently Defueled EAL scheme are predicated on approval of requests for exemptions from portions of 10 CFR 50.47(b); 10 CFR 50.47(c)(2); and 10 CFR Part 50, Appendix E, Section IV, submitted on July 11, 2022. 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.

The associated notice of consideration of issuance of amendment to facility operating license, proposed no significant hazards consideration determination, and opportunity for a hearing will be published in NRC's monthly Notice in the Federal Register on September 6, 2022.

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.

Thank you and have a great weekend!
Marlayna

Marlayna Vaaler Doell

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Decommissioning Project Manager  
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