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HDI PNP 2022-036

10 CFR 50.90

10 CFR 50.54(q)

November 8, 2022

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

Palisades Nuclear Plant  
Docket No. 50-255  
Renewed Facility Operating License No. DPR-20

Subject: Response to Request for Additional Information Regarding License Amendment Request for Proposed Permanently Defueled Emergency Plan and Permanently Defueled Emergency Action Level Scheme

- References:
- 1) Holtec Decommissioning International LLC, Letter HDI PNP 2022-016, to U.S. Nuclear Regulatory Commission, *License Amendment Request: Proposed Permanently Defueled Emergency Plan and Permanently Defueled Emergency Action Level Scheme*, (NRC ADAMS Accession Number ML22193A090), dated July 12, 2022
  - 2) U.S. Nuclear Regulatory Commission, Letter to Holtec International, LLC, *Palisades Nuclear Plant – License Amendment Request to Revise the Emergency Plan and Emergency Action Level Scheme (EPID No. L-2022-LLA-0099)*, (NRC ADAMS Accession Package Number ML22292A256), dated October 25, 2022

In accordance with Title 10 of the Code of Federal Regulations (CFR) Part 50, Section 90 (10 CFR 50.90), *Application for amendment of license, construction permit, or early site permit*, Holtec Decommissioning International, LLC (HDI), on behalf of Holtec Palisades, LLC (Holtec Palisades), submitted a license amendment request (LAR) for a proposed revision to the Permanently Defueled Emergency Plan and Permanently Defueled Emergency Action Level Scheme, HDI letter number HDI PNP 2022-016 (Reference 1). The proposed changes were submitted to the U.S. Nuclear Regulatory Commission (NRC) for approval prior to implementation, as required by 10 CFR 50.54, *Conditions of licenses*, paragraph (q)(4) and 10 CFR Part 50, Appendix E, *Emergency Planning and Preparedness for Production and Utilization Facilities*, Section IV, *Content of Emergency Plans*, paragraph B.2.

In Reference 2, HDI received a request for additional information (RAI) from the NRC on the

Subject LAR (Reference 2). The HDI response to the RAI is provided in the enclosure to this letter.

This letter contains no new commitments and no revised regulatory commitments.

In accordance with 10 CFR 50.91, *Notice for public comment; State consultation*, paragraph (b), a copy of this RAI response, with enclosure, is being provided to the designated State Official.

The response to the RAI does not affect the No Significant Hazards Consideration Determination and the Environmental Evaluation provided in Reference 1.

Should you have any questions or require additional information, please contact Jim Miksa, Regulatory Assurance Engineer at (269) 764-2945.

I declare under penalty of perjury; the foregoing is true and correct. Executed on November 8, 2022.

Respectfully,

Jean A. Fleming

Digitally signed by Jean A.  
Fleming  
Date: 2022.11.08 11:52:24 -05'00'

Jean A. Fleming  
Vice President, of Licensing, Regulatory Affairs & PSA  
Holtec International, LLC

Enclosure: Response to Request for Additional Information Regarding License Amendment  
Request for Proposed Permanently Defueled Emergency Plan and Permanently  
Defueled Emergency Action Level Scheme

cc: NRC Region III Regional Administrator  
NRC Senior Resident Inspector – Palisades Nuclear Plant  
NRC Project Manager – Palisades Nuclear Plant  
Designated Michigan State Official  
American Nuclear Insurers – Principal Account Engineer

**Enclosure to**

**HDI PNP 2022-036**

**Response to Request for Additional Information Regarding License Amendment Request  
for Proposed Permanently Defueled Emergency Plan and Permanently Defueled  
Emergency Action Level Scheme**

**Response to Request for Additional Information Regarding License Amendment Request  
for Proposed Permanently Defueled Emergency Plan and Permanently Defueled  
Emergency Action Level Scheme**

**NRC RAI**

*By application 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 the Palisades Nuclear Plant (PNP) to revise the PNP Emergency Plan and Emergency Action Level (EAL) scheme to reflect the permanently shutdown and defueled condition. The proposed changes were 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 PNP 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 the U.S. Environmental Protection Agency Protective Action Guidelines beyond the PNP site boundary. The proposed amendment would revise the PNP PDEP and the Permanently Defueled EAL scheme to be consistent with the proposed approval of associated emergency preparedness and planning exemptions, which are under review by the NRC staff.*

*The following is a request for additional information (RAI) to facilitate the technical review of the proposed PNP PDEP and the Permanently Defueled EAL scheme changes being conducted by the NRC's Division of Preparedness and Response, Reactor Licensing Branch staff. Timely and accurate response to this RAI is requested in order to continue the staff's review of the PNP PDEP and the Permanently Defueled EAL license amendment request.*

**RAI 1**

Requirement:

- 10 CFR 50.47(b)(15), as proposed to be exempted in the HDI "Request for Exemptions from Certain Emergency Planning Requirements of 10 CFR 50.47(b); 10 CFR 50.47(c)(2); and 10 CFR Part 50, Appendix E," dated July 11, 2022 ([ML22192A134](#)), states: Radiological emergency response training is provided to those who may be called on to assist in an emergency.
- Associated guidance in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants (FEMA-REP-1)," as modified by NSIR/DPR/ISG-02, "Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants," Evaluation Criterion O.3, states:

*Training for individuals assigned to licensee first aid teams shall include courses equivalent to Red Cross First Aid, CPR, AED for Lay Responders or equivalent.*

*Issue:*

*HDI does not provide information related to if courses equivalent to Red Cross First Aid, CPR, or AED are offered for Responders or equivalent.*

*Request:*

*Please provide what level of training is offered to personnel assigned to respond to emergencies at PNP.*

**HDI Response to RAI 1**

The Palisades Emergency Response Organization (ERO) onsite initial responders, as part of their position qualification program, receive First Aid, Cardiopulmonary Resuscitation (CPR) and Automated External Defibrillator (AED) training. The training classes use American Heart Association (AHA) or American Red Cross (ARC) course materials and are instructed by AHA or ARC qualified trainers, respectively. ERO initial responders consist of Operations Department Certified Fuel Handlers (CFH), and Radiation Protection (RP) Department RP Technicians, who are responsible for responding to onsite emergencies, and for providing first aid and/or CPR/AED assistance to injured, and if necessary, injured contaminated personnel. A minimum complement of qualified CFHs and RP Technicians are required to be onsite on a continuous basis.