



NRC Meeting: Regulatory Path for Reauthorization of Power Operations at the Palisades Nuclear Plant



May 24, 2023

Meeting Agenda



- Introductions
- Purpose & Outcome
- Overview Palisades Site Status
- Regulatory Framework Overview
- Submittal Discussion
- Environmental Review
- Open Forum

Introductions



■ Nuclear Regulatory Commission (NRC) staff

■ Holtec Staff

- Jean Fleming – Holtec International, Vice President of Licensing, Regulatory Affairs & PSA
- Michael Schultheis – HDI, Manager of Regulatory Assurance for Palisades & Big Rock Point

Purpose & Outcome



PURPOSE: To present a regulatory framework of submittals associated with the reauthorization of power operations at the Palisades Nuclear Plant.

OUTCOME:

1. Obtain comment from the NRC staff on the clarity of the regulatory framework.
2. Obtain comment from the NRC staff on potential gaps in the regulatory framework.

Overview Palisades Site Status



- The Palisades Nuclear Plant (PNP) is located on Lake Michigan, in Van Buren County's Covert Township, Michigan, on approx. 432-acres site, 5 miles south of South Haven, Michigan, USA
- PNP is currently in Incremental DECON as described in the Post-Shutdown Decommissioning Activities Report (PSDAR) submitted in December 2020 [ML20358A232]
- The Holtec decision to pursue the restart of PNP was influenced by the Infrastructure Investment and Jobs Act (IIJA) and State Governor support to provide Michigan with;
 - 840 megawatts of safe and reliable carbon-free electricity added to Michigan electrical grid
 - A dependable baseload generation vital to Michigan residents and businesses
 - A viable path to clean energy transition

Regulatory Framework Overview

- Request an Exemption from 10 CFR 50.82(a)(2) – Allows Return to Power Operations
 - Rescinds Certification of permanent cessation of power operations and Certification of permanent fuel removal.
- Request License Amendments (LAR) to restore operating plant licensing basis and authorize power operations at PNP through 10 CFR 50.90, *Application for amendment of license, construction permit, or early site permit*, to include:
 - Palisades' Renewed Facility Operating License (RFOL);
 - Technical Specifications (TS); and
 - Emergency Plan
- Revise PNP regulatory programs to support power operations, such as:
 - Quality Assurance Program
 - Physical Security Plan (voluntary LAR for substantial revision)
 - Inservice Inspection Program
 - Emergency Operating Procedures

Regulatory Framework Overview



- Restore Updated Final Safety Analysis Report (UFSAR) for PNP power operations
 - Safety reclassification of Systems, Structures and Components (SSCs) to support operating the PNP reactor.
 - Accomplished under 10 CFR 50.59, *Changes, tests, and experiments* process
- Review NRC orders and industry initiatives for applicability to resume power operations
 - Docket plans to resolve outstanding actions
 - Example - Reinstate Security Order EA-02-026 ICM B.1.a.
- Restore Systems, Structures, and Components (SSCs) to power operations licensing basis operability/functionality through Return-to-Service plans
 - SSC Return-to-Service plans will document actions taken to reestablish equipment qualifications through maintenance and testing

Submittal Discussion



- **Exemption Request** from 10 CFR 50.82(a)(2), *Upon docketing of the certifications for permanent cessation of operations and permanent removal of fuel from the reactor vessel, or when a final legally effective order to permanently cease operations has come into effect, the 10 CFR part 50 license no longer authorizing operation of the reactor or emplacement or retention of fuel into the reactor vessel*
 - Per 10 CFR 50.12(a)(2)(vi), special circumstances are present that would benefit public interest
 - 10 CFR 50.82 certifications rescinded coincident with Exemption Implementation
 - Will include conditional rescission of granted decommissioning exemptions
 - Certified Fuel Handler Exemption Severe Weather Authority
 - Exemptions for Permanently Defueled Emergency Plan (PDEP) post zirconium fire off-site ERO
 - Exemption to 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) Use of Decommissioning Trust Fund for Spent Fuel Management and Site Restoration without prior NRC Notification
 - Record Keeping Exemption for Declassified Systems
 - Withdrawal PSDAR coincident with Exemption Implementation

Submittal Discussion

- **License Amendment Request (LAR)**, to reinstate the PNP Technical Specifications (TS) to support power operations
 - Per 10 CFR 50.90
 - No material changes being sought to previous operating TS's
 - Any future TS changes will be requested via future LARs
- **LAR**, to reinstate the PNP TS Administrative Controls to support power operations
 - Per 10 CFR 50.90
 - No material changes being sought to previous operating TS Administrative Controls
- **LAR**, to reinstate with updates the PNP Emergency Plan and Emergency Action Levels (EAL) for an Operating Reactor
 - Per 10 CFR 50.90
 - Update EALs to NEI 99-01 Rev 6 (Rev 7, if available)
 - Transition to an Integrated Public Alert & Warning System (IPAWS) - per 50.54(q)
- **LAR**, to Update the PNP Physical Security Plan
 - Per 10 CFR 50.90,
 - Details will be discussed with the Office of Nuclear Security and Incident Response

Environmental Review



- Exemptions and Amendments Expected to Meet Eligibility Criteria for 10 CFR 51.22 Categorical Exclusion
- Amendments and Exemptions
 - No Significant Hazards Consideration
 - No Significant Increase in the Amounts or Types of Effluents Released Offsite
 - No Significant Increase in Individual or Cumulative Public or Occupational Exposure
- Exemptions
 - No Significant Construction Impact
 - No Significant Increase in the Potential for or Consequences from Radiological Accidents
 - Exemption Involves Other Regulatory Requirements of an Administrative, Managerial, or Organizational Nature

Open Forum



Thank You



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