



Pre-Submittal Meeting

Palisades Nuclear Plant

License Amendment Request to Support Resumption of Power Operations - Technical Specification Administrative Controls



February 6, 2024

Meeting Agenda



- Introductions
- Purpose & Outcome
- Background
- License Amendment Request (LAR) Content
- Reason for Proposed Changes
- Technical Specifications Administrative Controls (TS Admin) Section Reinstatement
- Regulatory Basis
- Environmental Assessment
- Licensee Actions to Support Reinstating Power Operations Licensing Basis (POLB)
- Schedule
- Questions

Introductions



- U.S Nuclear Regulatory Committee (NRC) Staff
- Holtec Decommissioning International, LLC (HDI)
 - Jean Fleming – Holtec International, Vice President of Licensing, Regulatory Affairs & PSA
 - Michael Schultheis – HDI, Manager of Regulatory Assurance for Palisades
 - Jim Miksa – HDI, Regulatory Assurance Engineer for Palisades

Purpose & Outcome

- Purpose:
 - Present proposed changes to the Palisades Nuclear Plant (PNP) Technical Specifications (TS):
 - Section 1.1, Definitions
 - Section 5.0, Administrative Controls
 - 5.1 Responsibility
 - 5.2 Organization
 - 5.3 Plant Staff Qualifications
 - 5.4 Procedures
- Outcome:
 - Solicit NRC Staff questions and comments ahead of submittal
 - Provide information to support NRC resource allocation

Background



- The Governor of the State of Michigan voices support for power operations at Palisades Nuclear Plant (PNP) (April 20, 2022, and September 9, 2022)
- PNP Docketed 10 CFR 50.82(a)(1) Certifications, Permanent Cessation Power Operations, Permanent Removal of Fuel from Reactor Vessel (June 13, 2022)
- Permanently Defueled Technical Specifications implemented at PNP (June 15, 2022)
- PNP ownership and license transferred from Entergy to Holtec (June 28, 2022)
- Holtec attends public meeting to present a proposed regulatory path for return of PNP to power operations (March 20, 2023)

Background



- Holtec attends public meeting to present a proposed regulatory framework for return of PNP to power operations with emphasis on exemption request to 10 CFR 50.82(a)(2) (May 24, 2023)
- The State of Michigan legislature expressed their support for the restart of PNP by approving a 2024 budget that includes 150 million dollars for the return of PNP to power operations (June 28, 2023)
- Holtec announces long-term power purchase agreement (PPA) with two PPA off-takers (September 12, 2023)
- HDI submitted Exemption to 10 CFR 50.82(a)(2) on September 28, 2023 (ADAMS Accession Number ML23271A140)

Background



- HDI submitted License Transfer Application for PNP Operational Authority on December 6, 2023 (ADAMS Accession Number ML23340A161)
- HDI submitted License Amendment Request Power Operations Technical Specifications on December 14, 2023 (ADAMS Accession Number ML23348A148)
- PNP Renewed Facility Operating License (RFOL) remains active (i.e., it has not been terminated)
- The PNP License Renewal 20-year term ends on March 24, 2031 (i.e., PNP return to power operations is currently within the License Renewal term)
- HDI Commences project to pursue subsequent license renewal for PNP to 2051 (October 2023)

LAR Content

- Reason for Proposed Change
- Description of Each Change with Basis
- Applicable Regulatory Requirements
- Precedent
- No Significant Hazards Consideration
- Environmental Evaluation
- Mark-ups and Clean TS Pages

Reason for Proposed Change



- Supports State of Michigan clean energy initiative
 - Governor of the State of Michigan Letters to US Secretary of Energy
 - Legislature State of Michigan 2024 Budget Approval 150 Million dollars for return of Palisades Nuclear Plant (PNP) to power operations
- Supports reinstatement of PNP POLB
- One of five key licensing actions
 - 10 CFR 50.82(a)(2) exemption to remove operational restrictions
 - License transfer application for operational authority
 - License amendment to restore Power Operations Technical Specifications
 - License amendment for Technical Specifications administrative changes (This proposed change)
 - License amendment to restore a power operations emergency plan

Reason for Proposed Changes

- TS Section 1.0, Use and Application:
 - TS 1.1 Definitions
 - Delete CERTIFIED FUEL HANDLER and NON-CERTIFIED OPERATOR
- TS Section 5.0, Administrative Controls
 - Sections are reinstated (Added or Deleted Text) to match Amendment 271
 - Permanently Defueled Technical Specification (PDTS) Amendment 272 Retained Changes:
 - Previous title changes (ex. plant superintendent to plant manager)

TS Admin Section Reinstatement

- TS Section 5.0, Administrative Controls
 - TS 5.1, Responsibility - Reinstates
 - Control room command function
 - TS 5.2, Organization - Reinstates
 - Organizational authority and independence for safe plant operation
 - Operating crew composition and minimum staffing
 - TS 5.3, Plant Staff Qualification - Reinstates
 - The operating staff qualification requirements
 - TS 5.4, Procedures - Reinstates
 - The full scope of RG 1.33, “Quality Assurance Program Requirements” operating procedures
 - Emergency operating procedures for an operating plant

Regulatory Basis

- 10CFR 50.36, Technical specifications
- 10CFR 50.54, Conditions of licenses

Environmental Assessment



- 10 CFR 51.22(c)(9) Categorical Exclusion
 - No Significant Hazards Consideration
 - No changes proposed to the power operations design basis configuration or operation of the plant as originally designed / constructed / operated
 - No relaxations in criteria used to establish safety limits or safety system settings or TS Limiting Conditions of Operation (LCOs) that were in effect during power operations prior to the decommissioning certifications
 - No significant change in the types or significant increase in the amounts of any effluents that may be released offsite
 - No physical plant changes
 - Restoration of Systems, Structures and Components (SSCs) to monitor and limit the amounts of effluents released ensures the 1972 FES-OL, the 1978 final addendum, and the 2006 license renewal Supplemental Environmental Impact Statement (SEIS) environmental impacts are not significantly changed
 - Resumed power operations conducted under existing environmental permits

Environmental Assessment



- 10CFR51.22(c)(9) Categorical Exclusion (cont.)
 - No significant increase in individual or cumulative public or occupational dose
 - Plant programs and processes to support an operating plant will be restored to ensure 10 CFR 20 limits are not exceeded. The previous radiological impacts to the public, as evaluated in the Final Environmental Statement (FES) and 1978 Addendum for the original 40 years and the SEIS for the additional 20 years is still bounding.

Licensee Actions to Support Reinstating POLB



- Restore commitments closed based on decommissioning certification
- Restore Updated Final Safety Analysis Report (UFSAR) to reflect power operations plant
- Restore compliance to NRC Orders and industry initiatives
- Develop Return to Service Plans for Safety Related and Important to Safety SSCs
- Restore Regulatory Programs and Operating Procedures (e.g.)
 - Quality Assurance Program
 - Inservice Inspection Program
 - Emergency Operating Procedures

Schedule

Title	Submit	Request Approval	Effective
Exemption	Sept 28, 2023	Dec 31, 2024	Aug 2025
License Transfer	Dec 6, 2023	Dec 31, 2024	Aug 2025
Power Ops Tech Specs	Dec 14, 2023	Jan 31, 2025	Aug 2025
Power Ops Admin Tech Specs	Feb 2024	Mar 2025	Aug 2025
Emergency Plan – Power Ops	Mar 2024	Apr 2025	Aug 2025
10 CFR 50.82(a)(7) – PSDAR	Mar 2024	NA	NA
Notice of Transition - POLB	Aug 2025	NA	NA

Effective Date – Transition Date, Palisades Transitions from Facility in Decommissioning to Power Operations Plant

Questions / Comments



- NRC Staff Questions or Comments?



Quality Assurance Program Reinstatement Plan

Palisades Nuclear Plant

To Support Resumption of Power Operations



February 6, 2024

Discussion Topics

- Purpose & Outcome
- Background
- Quality Assurance Program Manual (QAPM) Revision History
- Decommissioning Quality Assurance Program (DQAP)
- Power Operations QAPM
- Regulatory Basis
- Submittal Schedule
- Questions / Comments

Purpose & Outcome

- Purpose:
 - Present plan to reinstate the Palisades Nuclear Plant (PNP) Quality Assurance Program Manual (QAPM)
 - Pre-Shutdown Entergy QAPM
 - HDI Decommissioning Quality Assurance Plan (DQAP)
 - Palisades Power Operations QAPM
- Outcome:
 - Solicit NRC Staff questions and comments on QAPM reinstatement plan

Background



- PNP Docketed 10 CFR 50.82(a)(1) Certifications, Permanent Cessation Power Operations, Permanent Removal of Fuel from Reactor Vessel (June 13, 2022)
- Permanently Defueled Technical Specifications (PDTS) implemented at PNP coincident with Site Specific QAPM.
 - Site specific QAPM revised to reflect Certified Fuel Handlers (CFH) (June 15, 2022)
- PNP ownership and license transferred from Entergy to Holtec Decommissioning International, LLC (HDI) (June 28, 2022).
 - Palisades and Big Rock Point (BRP) added to HDI DQAP.

QAPM Revision History



- Entergy Fleet QAPM R42 effective at PNP prior to June 15, 2022
- PNP Site Specific QAPM R0 implemented on June 15, 2022
 - Removed Entergy Sites from QAPM except for PNP and BRP
- PNP Site Specific QAPM R1 implemented on June 15, 2022, until June 28, 2022.
 - Revised site specific QAPM to include Certified Fuel Handlers and removed licensed operators.
- Holtec Decommissioning International, LLC (HDI) DQAP R2 adopted at PNP on June 28, 2022.
 - Reduced commitments to reflect a facility in decommissioning.

- Effective at PNP and BRP until the transition date (Q3 2025).
 - Transition date – the date PNP transitions from a facility in decommissioning to a power operations plant
- Supports the current decommissioning licensing basis. Maintains alignment and prevents conflicts between current licensing basis documents.
- DQAP remains effective for BRP

Power Operations QAPM



- 2Q 2024 target submittal of PNP Power Ops QAPM for NRC staff review
- Power Ops QAPM followed during Palisades restart activities prior to Effective Date
- PNP Project Execution Plan (PEP) provides details for QAPM prior to Effective Date
- Effective and implemented at PNP on the Q3 2025 transition date to Power Operations
- QAPM enables verification of design classification, testing, and maintenance in preparation for reinstating SSC functionality / operability
 - Supports Return to Service Plans
- QAPM Aligns with previous power operations site implementing procedures

Power Operations QAPM

- Based on Entergy Fleet QAPM R42 (ML22104A078) - Effective at PNP prior to shutdown
 - Removes other Entergy Sites and Entergy Site Specific Information
 - Removes Big Rock Point
 - Changes Owner Description
 - Changes Organizational Titles
 - Updated Staff Position Responsibilities to Match Revised Power Operations Organization
 - Change name of off-site safety review committee to Nuclear Safety Review Board (NSRB)

Regulatory Basis

- 10 CFR 50.54(a), Conditions of licenses

- PDTs Section 5.4 (Current License Basis)

Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- The procedures applicable to the safe storage of spent nuclear fuel recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

- Power Operations TS Section 5.4 (Future License Basis)

Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.

NOTE: Regulatory Guide 1.33,
Quality Assurance Program Requirements (Operation)

Submittal Schedule

- Submit – April 2024
- Request Approval – May 2025
- Implement – Q3 2025 (On Transition Date)

Questions / Comments



- NRC Staff Questions or Comments?

Thank You



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