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Pre-Submittal Meeting

Palisades Nuclear Plant

Power Operations Quality Assurance Program Manual



April 29, 2024

Meeting Agenda

- Introductions
- Meeting Purpose & Outcome
- Background
- Palisades Quality Assurance Program Manual (QAPM) Revision History
- Submittal Content
- Schedule
- Questions

Introductions



- U.S Nuclear Regulatory Committee (NRC) Staff
- Holtec Decommissioning International, LLC (HDI)
 - Jean Fleming – Holtec International, Vice President of Licensing and Regulatory Affairs
 - Michael Schultheis – HDI, Director of Regulatory and Site Strategies at Palisades

Meeting Purpose & Outcome

- Purpose:
 - Present the Palisades Energy power operations Quality Assurance Program Manual (QAPM), submitted by Holtec Decommissioning International, LLC, that will support the Palisades power operations licensing basis (POLB).
 - Primarily organizational changes as a result of the transfer of PNP ownership from Entergy to HDI
 - Some minor administrative changes
- Outcome:
 - Inform the NRC of changes to the QAPM due to the Palisades ownership transfer from Entergy to HDI.

Background



- April 20, 2022, The Governor of the State of Michigan voices support for power operations at Palisades Nuclear Plant (PNP)
- June 13, 2022, PNP docketed 10 CFR 50.82(a)(1) Certifications of Permanent Cessation Power Operations and Permanent Removal of Fuel from Reactor Vessel (ADAMS Accession No. ML22164A067)
- June 15, 2022, Site specific QAPM revised to reflect Certified Fuel Handlers (CFH)
- June 28, 2022, PNP ownership and license transferred from Entergy to Holtec
 - Palisades and Big Rock Point (BRP) added to HDI DQAP.
- March 20, 2023, Holtec holds a public meeting to present a proposed regulatory path for return of PNP to power operations
- May 24, 2023, Holtec holds a 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)

Background



- June 28, 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
- September 28, 2023, HDI submitted Request for Exemption from Certain Termination of License Requirements of 10 CFR 50.82 on (ADAMS Accession No. ML23271A140)
- December 6, 2023, HDI submitted License Transfer Application for PNP Operational Authority on (ADAMS Accession No. ML23340A161)
- December 14, 2023, HDI submitted License Amendment Request Power Operations Technical Specifications (ADAMS Accession No. ML23348A148)
- December 27, 2023 , NRC approves Permanently Defueled Emergency Plan (PDEP) and Revised Emergency Action Levels (EALs) for Decommissioning (ADAMS Accession No. ML23236A004)

Background



- February 9, 2024 , HDI submitted License Amendment Request to Revise Selected Permanently Defueled Technical Specifications Administrative Controls to Support Resumption of Power Operations (ADAMS Accession No. ML24040A089)
- March 27, 2024, Holtec secured a \$1.5 Billion USD loan from the US Department of Energy to support the repowering of the Palisades Nuclear Plant.
- 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)

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.

Submittal Content

- Proposed Power Operations Quality Assurance Program Manual
- 50.54(a) Change Evaluation
 - Purpose
 - Discussion
 - Conclusion
 - Table of Changes and Associated Evaluation
- Entergy Power Operations Quality Assurance Program Implemented at Palisades.

50.54(a) Purpose

- Proposed Power Operations Quality Assurance Program Manual
- 50.54(a) Change Evaluation
 - Purpose
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 - Table of Changes and Associated Evaluation
- Entergy Power Operations Quality Assurance Program Implemented at Palisades.

50.54(a) Table of Changes

- 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
 - Deleted reference to Nuclear Oversight and replaced with Quality Assurance.
 - Changes Owner Description and 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)
 - Consolidated the function of the Entergy Oversight Manager and QA Supervisor into one position at Palisades; the Quality Assurance Manager.

50.54(a) Discussion

■ 50.54(a) Change Evaluation

10 CFR 71.106 Questions		Yes, No or N/A
Is the change editorial in nature?		No
Does the change represent a reduction in commitment?		No
Is the change a change to a QA standard?		No
Does the change use generic organizational titles, rather than specific titles?		No
Does the change use descriptive text to describe functional relationships?		Yes
Does the change eliminate QA program information duplicating language in QA Reg Guides and QA Standards?		No
Does the change continue to ensure persons or organizations performing QA functions continue to have requisite authority and organizational freedom, including sufficient independence from cost and schedule?		Yes

50.54(a) Conclusion

- Since the change is not considered editorial and does not utilize generic organizational changes, the change requires an LAR.
- To note, no reduction of commitments exist.

Power Operations QAPM - What is not changing



- With the exception of the organizational and administrative changes, the body of the QAPM remains the same in terms of wording, grammar and sequence.

Schedule

Title	Submit	Request Approval	Effective
Exemption	Sep 2023	Dec 2024	Aug 2025
License Transfer	Dec 2023	Jan 2025	Aug 2025
Power Ops Tech Specs	Dec 2023	Jan 2025	Aug 2025
Power Ops Admin Tech Specs	Feb 2024	Mar 2025	Aug 2025
10 CFR 50.82(a)(7) - Post-Shutdown Decommissioning Activities Report (PSDAR)	Mar 2024	N/A	Mar 2024
Notification of Intent to Pursue Subsequent License Renewal	April 2024	N/A	N/A

Transition Date - Palisades Transitions from Facility in Decommissioning to Power Operations Plant

Schedule - Continued

Title	Submit	Request Approval	Effective
Emergency Plan – Power Ops	May 2024	Jun 2025	Aug 2025
Power Operations Quality Assurance Plan – POLB	May 2024	June 2025	Aug 2025
Supplement Power Ops Tech Specs to docket Physical Security Plan for Power Operations	June 2024	Jan 2025	Aug 2025
Notification of Readiness to Transition - POLB	Jul 2025	N/A	N/A
Notification of Transition – POLB	Aug 2025	N/A	Aug 2025

Transition Date - Palisades Transitions from Facility in Decommissioning
to Power Operations Plant

Questions

- NRC Staff Questions or Comments?

Thank You



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