

From: Mary Richmond
Sent: Thursday, November 14, 2024 10:35 AM
To: PalisadesRestart-EnvDocsPUBLICem Resource
Subject: FW: 2024 NRC Environmental Audit for Palisades RAI (ML24278A027) follow-up email communication

From: Johann Britting <j.britting@holtec.com>
Sent: Thursday, October 17, 2024 3:51 PM
To: Mary Richmond <Mary.Richmond@nrc.gov>
Subject: [External_Sender] 2024 NRC Environmental Audit for Palisades RAI (ML24278A027) follow-up email communication

Mary,

The verbal questions from the Nuclear Regulatory Commission (NRC) staff and Holtec Decommissioning International (HDI) responses from the meeting on October 9th, 2024, regarding HDI submittal ML24278A027 (Response to Requests for Additional Information Regarding the Proposed Reauthorization of Power Operations of Palisades Nuclear Plant under Renewed Facility Operating License Number DPR-20) were/are;

1. Question:

For the new South Radiological Waste Storage Facility, what is the planned excavation depth?

HDI Response:

The building specifications for the new South Radiological Waste Storage facility have not yet been defined. Excavation depths and building foundation requirements will be in accordance with international building codes. It is anticipated that the excavation depth will be a minimum of 42 inches deep. HDI submittal ML24278A027 (Response to Requests for Additional Information Regarding the Proposed Reauthorization of Power Operations of Palisades Nuclear Plant under Renewed Facility Operating License Number DPR-20) documented an estimated land disturbance area of 1 Acre for this activity.

2. Question:

For the new Digital Staging Testing Building, what is the planned excavation depth?

HDI Response:

The current planned excavation depth for the Digital Staging Testing Building is estimated to be approximately one foot.

3. Question:

For excavation activities associated with the erection of new buildings onsite how is groundwater intrusion controlled or mitigated?

HDI Response:

Ground Water intrusion during excavation activities is controlled and mitigated in accordance with State and Federal Regulations and site procedures. Palisades National Pollutant Discharge Elimination System (NPDES) permit (No. MI0001457) and Palisades Licensing Basis Documents, such as the Offsite Dose Calculation Manual, provides limits with respect to water quality and permitted outfalls. Palisades NPDES permit contains one permitted outfall (outfall 001) and three permitted monitoring points (001A, 001D, and 001F). The permitted monitoring points contain unique engineering controls (such as flow totalizers, oil-water separators, or flow controllers) and unique sampling and reporting requirements. Palisades NPDES permit also implements the requirements of the storm water pollution prevention plan (SWPPP), which among other things, defines monitoring requirements, nonstructural control requirements, and structural control requirements. Palisades NPDES permit Section B, *Storm Water Pollution Prevention Plan* states, "Discharges of material other than storm water shall be in compliance with an NPDES permit issued for the discharge. Storm water shall be defined to include all of the following non-storm water discharges, provided pollution prevention controls for the non-storm water component are identified in the SWPPP... j. uncontaminated groundwater...". Palisades licensing basis documents, such as the Offsite Dose Calculation Manual, contains, among other things, the requirements for the operation, monitoring, limits, and reporting of permitted radiological discharge pathways. All work activities are screened for appropriate radiological controls in accordance with occupational radiological control regulations. Palisades implements an "As Low as is Reasonably Achievable" (ALARA) program in accordance with Federal regulations.

4. Question:

What is the approximate volume of water required to refill the cooling tower basins?

HDI Response:

Summary

The total volume of the circulating water system from the circulating water pumps to the condenser outlet water boxes is approximately 604,000 ft³ or 4.5 million gallons.

Supply Pipes to the Cooling Tower

The supply lines to Cooling Tower A are approximately 44,100 ft³.

The supply lines to Cooling Tower B are approximately 79,100 ft³.

Cooling Tower Water Deck

The Cooling Tower Water Deck is approximately 11,700 ft³ per cooling tower.

Cooling Tower Basin

The Cooling Tower Basin is approximately 158,500 ft³ per cooling tower.

Return Pipes to the Condenser

The Return Pipes to the Condenser is approximately 47,000 ft³ for Cooling Tower A.

The Return Pipes to the Condenser is approximately 77,000 ft³ for Cooling Tower B.

Supply Water box

The supply water box is approximately 2160 ft³ for each of the two supply water boxes (4320 ft³ total for both).

Condenser Tubes

The Condenser Tubes are approximately 8,050 ft³ total.

Discharge Water Box

The discharge water boxes are approximately the same dimensions as the supply water boxes; 2160 ft³ for each of the two discharge water boxes (4320 ft³ total for both).

Thank you,

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