

Public Meeting Agenda



5:00-6:00 pm	Open House	NRC
6:00-6:15 pm	Welcome, Ground Rules, Opening Remarks	Facilitator, NRC
6:15-6:25 pm	NRC Presentation on Emergency Preparedness	NRC
6:25-6:40 pm	FEMA Presentation on Emergency Preparedness	FEMA
6:40-7:15 pm	Palisades Restart Panel Presentation	NRC
7:15-7:30 pm	Statements from Elected Officials	Public Officials
7:30-9:00 pm	Public Questions and Comments	
9:00 pm	Meeting Adjourned	

Potential Palisades Nuclear Plant Restart

U.S. Nuclear Regulatory Commission
November 20, 2024

Maximizing Engagement

Please silence phones, smart watches, and laptops.

Please keep your questions brief and concise to allow everyone to participate.



Questions

- In-Person: Use one of the microphones
- Dial-in using the bridgeline
- Raise Hands on Teams



Dial-In Info

- **1 (301) 576-2978**
Passcode:
734192637#
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Meeting Opening



Welcome & Ground Rules

Meredith Neubauer,
NRC Facilitator

Opening Remarks

Phil McKenna,
Deputy Director, Division of
Reactor Oversight (DRO)

Introductions

NRC Staff, FEMA



PALISADES RESTART EMERGENCY PREPAREDNESS

Jeffrey Herrera, Emergency Preparedness Specialist
Reactor Licensing Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission

How Emergency Preparedness is Verified



NRC's Role

- Evaluate if nuclear power plant emergency plans are adequate to protect public health and safety.
- Evaluate if nuclear power plant emergency plans can be used by emergency response personnel and ensure the plans provide for sufficient resources and equipment during an emergency.
- Review FEMA evaluations of offsite emergency preparedness.
- Make decisions on the overall state of emergency preparedness.

FEMA's Role

- Evaluate if State and local emergency plans are adequate to protect public health and safety.
- Evaluate if State and local emergency plans can be used by emergency response personnel and provide for sufficient resources and equipment during an emergency.
- Evaluate the alert and notification system for nuclear power plants, including outdoor warning sirens, as applicable.
- Assume responsibility for emergency preparedness training of State and local officials as a supplement to State, local and utility efforts.

Current State of the Emergency Plan



- A Permanently Defueled Emergency Plan was approved that eliminated the requirements for an offsite emergency plan and reduced the scope of onsite emergency planning activities.
- A Permanently Defueled Emergency Action Level scheme was approved for the storage of spent fuel.

Holtec's Requested Revisions



- Revise the emergency plan for power operations and upgrade the plan to the latest joint NRC/FEMA guidance
 - NUREG-0654/FEMA-REP-1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants - Final Report,” Revision 2.
- Restore the previously NRC-approved emergency action level scheme for power operations

Differences Between Operational and Decommissioning Emergency Plans



Decommissioned Site

Focused on addressing low consequence, limited impact emergencies

- No formal offsite radiological emergency preparedness (REP) planning:
 - No emergency planning zone (EPZ)
 - No alert and notification system (ANS)
 - No evacuation time estimate studies (ETE)
 - Removes Site area emergency (SAE) & General emergency (GE) classification levels
- Prompt offsite agency notification
- Recommended protective actions, if necessary
- Streamlined site emergency response organization
- No dedicated offsite facilities; common onsite facility
- Offsite response organizations invited to participate in biennial exercises

Operating Reactor

Multi-faceted, to address a variety of emergencies, including hostile action events, affecting public health and safety

- Formal offsite REP planning that includes:
 - Emergency Planning Zone
 - Alert and Notification System
 - Evacuation Time Estimate Studies
 - All Emergency Classifications
- Immediate offsite notification
- Predetermined offsite protective actions
- Extensive site/offsite emergency response organizations
- Dedicated on- and off-site facilities
- Joint, biennial exercises
- Comprehensive site/offsite training

Emergency Preparedness Review and Oversight



- Review of onsite and offsite emergency plans:
 - NRC is reviewing Holtec's proposed onsite emergency plan for compliance with the NRC regulations.
 - NRC has requested FEMA to review the State and local emergency plans.
 - Results of FEMA's review of State and local emergency plans are provided to the NRC to ensure public health and safety.
- NRC Region III will lead inspections of onsite facilities and procedures.
- Palisades will need to conduct a full participation emergency exercise with NRC inspecting onsite activities and FEMA evaluating offsite activities.

Inspection Overview



- Perform comprehensive emergency preparedness inspections
 - Validate Holtec's emergency preparedness program meets requirements for operations
 - Verify Palisades' emergency response capabilities during an exercise
- Coordinate with FEMA to:
 - Transition to full operational offsite radiological emergency response plans

Inspection Overview (Cont'd)



Onsite Inspections:

- Emergency response facilities
 - Technical Support Center
 - Operations Support Center
 - Emergency Operations Facility
- Communication equipment status
- Emergency action level instrumentation and calibration
- Emergency response organization staffing, training and qualifications
- Alert and notification system equipment status

Full Participation Emergency Exercise



Full participation definition:

- Appropriate offsite local and State authorities and licensee personnel physically and actively take part in testing their integrated capability to adequately assess and respond to an accident at a commercial nuclear power plant.
- Full participation includes testing major observable portions of the onsite and offsite emergency plans and mobilization of State, local and licensee personnel and other resources in sufficient numbers to verify the capability to respond to the accident scenario.

Source 10 CFR 50, Appendix E (IV)(f)(2)(i) – Note 4

Palisades Emergency Preparedness Summary



- License amendment review (in progress)
- FEMA will review offsite plans
- Inspections will be performed
- Full participation emergency exercise needs to be conducted

Establishing an Offsite Preparedness Program

Joint NRC & FEMA Public Meeting / Palisades Restart



FEMA

Palisades Decommissioning Actions

- Following Holtec's request of 11 July 2022, the NRC exempted Holtec from certain provisions of the NRC's federal regulations concerning emergency response planning activities.
- As a result of the NRC exemption, the State of Michigan and the Counties of Allegan, Berrien, and Van Buren have no responsibility to maintain plans, procedures, equipment, or performance capabilities for the Palisades facility.
- This also eliminated Federal, state, and local funding for the Radiological Emergency Preparedness program for the Palisades facility.

Establishing an Offsite Program

- The regulations which govern FEMA's approval of an offsite program for the Palisades facility are outlined in the Code of Federal Regulations, Title 44 Part 350.
- The regulations establish policy and procedures for FEMA review and approval of State and local radiological emergency plans and procedures.
- These regulations have governed the start and expansion of every offsite program since the start of the FEMA Radiological Emergency Preparedness Program.

STEP 1 – Application submitted by the State

- The state of Michigan will submit State and local government plans and procedures related to Palisades Emergency Preparedness.
- FEMA will assist State and local government officials in developing their plans and procedures.
- It may be possible to adapt the plans and procedures that were in place prior to decommissioning.
- Plan submittal may happen as early as First Quarter 2025.

STEP 2 – Initial FEMA actions

- FEMA will conduct a detailed plan review. FEMA conducts annual plan reviews for every commercial nuclear power plant in the country.
- FEMA will solicit review and comment from other Federal Agencies.
- FEMA will begin planning for public participation and initial exercise (Steps 3 and 4.)

STEP 3 – FEMA-led Public Meetings

- FEMA will conduct public meetings to solicit comments and concerns from the public.
- The purpose of these public meetings is to provide information about the plans and the exercise and to ensure the public has adequate opportunity to engage in the review and approval process
- FEMA will describe how the plan will be implemented in the event of an actual emergency.
- FEMA will solicit public comments and questions about the plan.

STEP 4 – Joint Full Participation Exercise

- There will be an exercise involving the State, local government entities, and the licensee.
- Exercises are a cornerstone of the REP program and they occur biennially at every commercial nuclear power plant.
- This is an initial exercise, therefore all elements of the plan must be observed and evaluated.
- As in other REP Program exercises, DHS/FEMA will hold a participants' briefing and a public briefing within 48 hours after the completion of the exercise.
- Holtec proposed the exercise for Summer 2025.

STEP 5 – FEMA Review and Approval

- The plan review, public meeting comments, and the results of the evaluated exercise are reviewed by FEMA regional staff.
- The assembled documents will be submitted to the FEMA Deputy Administrator for review and approval.
- The FEMA Deputy Administrator approves the state plan and communicates it to the Governor of Michigan, the NRC, and to the public through the Federal Register.

Protecting the public is the purpose of the FEMA Radiological Emergency Preparedness program. Public comment is essential in ensuring your concerns and questions are addressed.

This email is available for you to send us your comments. Please share it widely.

FEMA-PublicComment-Palisades@fema.dhs.gov

What is FEMA's mission?



S.P. O'Leary
Regional Assistance Committee Chair
DHS/FEMA Region 5



FEMA



FEMA

PRP Update



- Generic Letter (GL) 2004-02/
Generic Safety Issue (GSI) 191
- Inspection Activities
- Resident Inspectors Staffing

GL 2004-02/GSI-191



- Generic Letter (GL) 2004-02 requested plants perform an evaluation of the emergency core cooling system and containment spray system recirculation functions and, if appropriate, take additional actions to ensure system function.



- Prior to shutdown, Palisades completed analyses, testing, and modifications to improve containment sump performance.

GL 2004-02/GSI-191 Closure Plan



- The NRC staff held a public meeting in October with Holtec regarding resumption of work on GL 2004-02.
- Holtec plans to submit their updated GL 2004-02 plan by December 2024 and final plan by June 2026.
- The NRC staff plans to review Holtec's closure plan for Palisades.

Inspection Activities



- Most recent inspection results are documented in the 3rd Quarter Inspection Report
 - Primary Coolant System Decontamination
 - Reactor Pressure Vessel Inspections
 - Steam Generator Inspections



Primary Coolant System Decontamination



- Evaluated radiological hazards controls and worker performance
- Evaluated potential impacts to plant and impacts of temporary system connections

Reactor Pressure Vessel Inspections



- Inspectors observed and verified nondestructive examination activities and evaluation of examination results
- Purpose to verify the following are appropriately monitored for degradation:
 - Reactor coolant system boundary
 - Reactor vessel internals
 - Risk-significant piping system boundaries

Steam Generator Inspections



- Inspectors observed and verified steam generator (SG) inspection activities
- The purpose of the inspections is to verify that the SG tube integrity is appropriately monitored and any potential mechanisms that could lead to primary-to-secondary tube leakages are addressed

Steam Generator Inspections

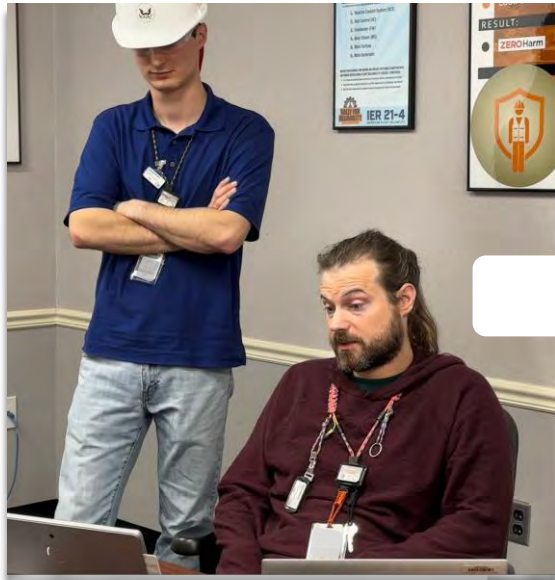


- Eddy current testing identified a large number of tubes that require activities to restore tube integrity in both SGs
- Holtec finalizing repair methodology and scope
- NRC Inspectors will be onsite to observe aspects of SG repair activities

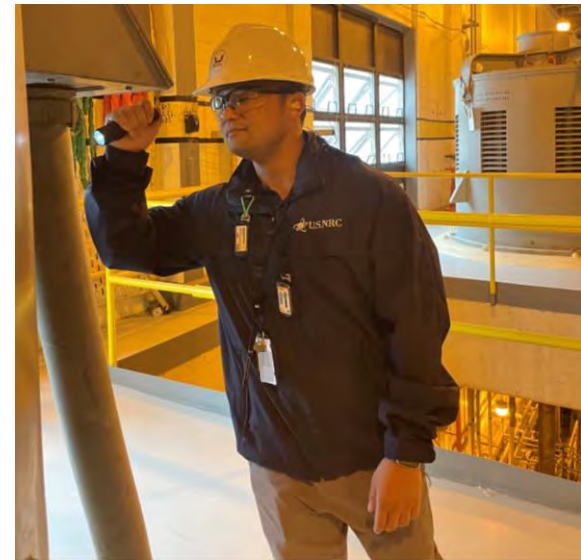
Palisades Resident Inspectors



Takuma Okamoto
Resident Inspector



Joseph Mancuso
Senior Resident Inspector



For Further Information



- Find further information about the Palisades Potential Restart Project:

<https://www.nrc.gov/info-finder/reactors/pali.html>



- Contact us at:
PalisadesRestartProject@nrc.gov

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