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Pre-Submittal Meeting

Palisades Nuclear Plant Open Phase Detection Closure Plan



April 29, 2025

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Meeting Agenda

- Introductions
- Purpose & Outcome
- Background
- Closure Plan
- Regulatory Approach
- 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 Holtec Palisades LLC, Director of Regulatory and Site Strategies
 - Joe Jerz Holtec Palisades LLC, Engineering Director
 - Kate Chenier Holtec Palisades LLC, Engineering Design Manager
 - Johann Britting Holtec Palisades LLC, Licensing Engineer



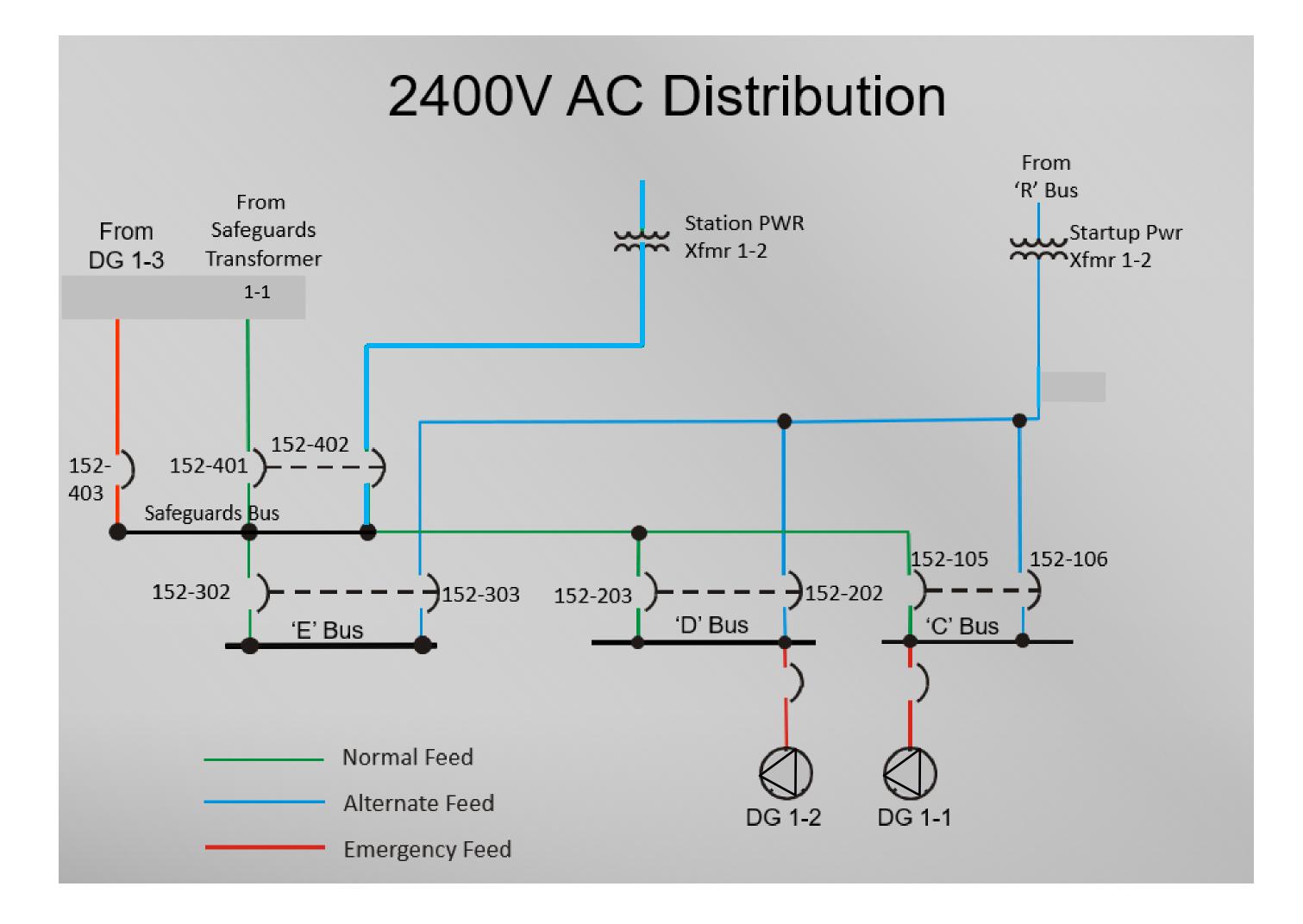
Purpose & Outcome

Purpose:

- Inform NRC of Palisades Nuclear Plant (PNP) plans to resume work on Open Phase Detection
- prior to placing the plant in decommissioning status.
- Provide a summary of Open Phase Detection activities completed Present key elements of the Open Phase Detection closure plan
- Outcome:
 - Solicit NRC Staff questions and comments on proposed closure plan
 - Provide schedule information to support NRC resource allocation



Background



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Background

- 2012 NRC issued Bulletin 2012-01, "Design Vulnerability in Electric Power System" (ML12074A115)
- 2012 Entergy Nuclear Operations, Inc. letter to NRC, PNP 2012-093, "90-Day Response to NRC Bulletin 2012-01, Design Vulnerability in Electric Power System," dated October 25, 2012 (ML12300A063).
 - Entergy made plans to implement a hardware modification to eliminate the vulnerability to an undetected open phase condition on the offsite power circuits at Palisades Nuclear Plant (PNP).
- 2013 NEI letter to the NRC, "Industry Initiative on Open Phase Condition" (ML13333A147)
- 2014 NEI letter to the NRC, "Regulatory Issues Related to Open Phase Conditions, dated August 14, 2014 (ML14226A805, ML14226A806)
- 2014 NEI letter to Entergy Nuclear Operations, Inc, "Guidance for Deviations to the Open Phase Condition (OPC) Initiative" (APC 14-25) dated October 14, 2014



Background

- 2015 NEI letter to NRC, "Industry Initiative on Open Phase Condition, Revision 1" (Project Number: 689), dated March 16, 2015.
- 2018 Entergy Nuclear Operations, Inc. letter to NRC, "Schedule Change to Open Phase Condition Detection Implementation", (CNRO2018-00053) dated December 20, 2018 (ML18354A823).
- 2018 Open Phase Detection System was installed on Startup Transformer 1-2 (EX-04) during the 1R26 refueling outage in Fall of 2018.
- 2021 Entergy Nuclear Operations, Inc. letter to NRC, "Schedule Change to Open Phase Condition Detection Implementation", (PNP 2021-017) dated April 1, 2021 (ML21091A062).



Closure Plan

Re-develop Engineering Change Plan to install Open Phase Detection on the 345kV side of Safet guards Transformer 1-1 (EX-07). This will be installed in the next Refuel Outage window.



<u>Schedule</u>

Milestone

Redevelop Design Change Package

Implement Design Change Package

Monitor Data Report

Final Adjustments after Monitoring Period

Design Change Closeout

Update Design Basis Information

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Date
2Q2027
4Q2027
2Q2028
3Q2028
3Q2028
3Q2028

Questions

NRC Staff Questions, Comments & Feedback

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Thank You



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