



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 8, 2024

LICENSEE: Holtec Decommissioning International, LLC

FACILITIES: Palisades Nuclear Plant

SUBJECT: SUMMARY OF MARCH 18, 2024, PRE-SUBMITTAL MEETING WITH HOLTEC DECOMMISSIONING INTERNATIONAL, LLC REGARDING PROPOSED EMERGENCY PLAN FOR RESUMPTION OF POWER OPERATIONS AT THE PALISADES NUCLEAR PLANT

On March 18, 2024, the U.S. Nuclear Regulatory Commission (NRC) staff held a hybrid meeting with representatives of Holtec Decommissioning International, LLC (Holtec, the licensee). The NRC staff, Holtec representatives, and members of the public participated in-person and remotely via Microsoft Teams. The purpose of this meeting was for the NRC staff and Holtec representatives to discuss proposed revisions to the emergency plan (EP) for the proposed resumption of power operations at the Palisades Nuclear Plant (PNP). Holtec intends to submit a license amendment request (LAR) to revise the PNP site EP in April 2024. The meeting notice and agenda dated February 26, 2024, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML24057A418. A list of attendees is provided as an enclosure. Holtec's presentation is available in ADAMS at Accession No. ML24074A330.

For the EP LAR submittal, Holtec plans to submit a proposed PNP Power Operations Site Emergency Plan (POSEP), to include changes from the pre-decommissioning PNP site EP. The Holtec representative explained that the proposed POSEP will be based on NUREG-0654/FEMA-REP-1, Revision 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants: Final Report" (ADAMS Accession No. ML19347D139). In the presentation, the Holtec representative indicated that the benefits of using NUREG-0654, Revision 2, is for consistency with industry precedent, and to minimize changes and impacts on PNP staff preparing for restart. The Holtec representative also explained that the PNP site EP that was in effect prior to permanent cessation of power operations was based on NUREG-0654, Revision 1, which is Revision 32 of PNP site EP. As denoted in Holtec's presentation, the proposed POSEP is primarily a reorganization of the content of the previous PNP site EP, Revision 32, that incorporates NUREG-0654, Revision 2, changes, with deviations. Holtec's proposed deviations from NUREG-0654, Revision 2 includes,

- Elimination of Emergency Operations Facility (EOF) Communicator Position;
- Combine Craft Supervisor to Single Position;
- Eliminate EOF Information Technology (IT) Technician Emergency Response Organization (ERO) Position;
- Credit Radiological Protection (RP) Task-Qualified Personnel in the Operations Support Center (OSC); and
- Allow Remote Response for Engineering and Dose Assessment

Also important to the discussion on POSEP changes, the Holtec representative indicated no plans to change the current On-Shift Staffing Analysis (ADAMS Accession No. ML17269A183), and Evacuation Time Estimate (ETE) (ADAMS Accession No. ML22250A524).

To address emergency action levels (EAL) for the resumption of power operations, Holtec plans to replace the current PNP Permanently Defueled Emergency Plan (PDEP) EALs that were approved by NRC on December 27, 2023 (ADAMS Accession No. ML23236A004), with the approved EALs that were in place immediately prior to cessation of power operations. Additionally, the proposed EALs for power operations would retain Independent Spent Fuel Storage Installation (ISFSI) EALs approved as part of PDEP LAR. Of note, the EALs that were in effect prior to permanent cessation of power operations were based on NEI 99-01, Revision 5, "Methodology for Development of Emergency Action Levels" (ADAMS Accession No. ML080450149).

In the discussion, the NRC staff emphasized that Holtec should be aware of two areas that applicants need to address in EP submittals. For the first area, the NRC staff observes that some licensees are not including sufficient detail about the actual proposed changes compared to its current EP based on NUREG-0654. More specifically, the NRC staff would be looking for submittals with full documentation and explanation of all changes being proposed to the current EP.

For the second area, the NRC staff has observed that some licensees are not providing enough information for the evaluation criteria to show a relationship to NEI 99-01. Specifically, the NRC staff would be looking for licensees to provide clear descriptions and address for example, alert notification, facility under evaluation criteria, technical centers, and EOF. Additionally, the NRC staff is looking for adherence to the NUREG-0654 guidance in their review and evaluation.

The NRC staff also made the following observations on Holtec's presentation regarding deviations from NUREG-0654, Revision 2.

- The NRC staff has not previously approved the use of RP Task-Qualified personnel in the OSC.
- There is no precedence for the proposed deviation for the use of RP Task-Qualified personnel.
- More deviations/difference from the guidance could increase the chance of having an extended review.
- The NRC staff is currently considering the endorsement of industry guidance for the use of remote response for engineering and dose assessment.

The NRC staff asked Holtec representatives if they would be submitting a LAR to change the EAL scheme back to what was the previous power operations since the scheme had been changed from an operating reactor status to decommissioning. The NRC staff also emphasized that Holtec would need to submit an LAR to get prior approval for the EAL scheme change per the regulations in Appendix E.IV.B.2 of Part 50 to Title 10 of the *Code of Federal Regulations*. Holtec representative explained that the LAR submittal is expected by mid-April 2024. There were several comments and questions from members of the public during the meeting.

There were several comments in favor of moving forward with the PNP restart activities for reasons related to belief that the NRC will do what it takes to make the plant safe, vital to the county and state of Michigan, an important long-term benefit, carbon free goals, and safe reliable energy. Other comments were against moving forward with the PNP restart activities for reasons such equipment (e.g., steam generator, dry storage casts) concerns, repairs, reducing onsite safety personnel, potential vulnerabilities of using remote personnel, environmental review process, waste disposal, condition of electrical and mechanical equipment that have not been in use since shutdown, and concerns over the use of the decommissioning trust funds. No Public Meeting Feedback Forms were received.

Please direct any inquiries to me at 301-415-6695, or via email at Ngola.Otto@nrc.gov.

/RA/

Ngola A. Otto, Project Manager
Licensing Projects Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure:
List of Attendees

cc: Listserv

List of Attendees

March 18, 2024, Meeting with Holtec Decommissioning International, LLC

Regarding Proposed Emergency Plan for the Proposed Resumption of
Power Operations at the Palisades Nuclear Plant.

Nuclear Regulatory Commission

- Jamie Pelton, Deputy Director, Office of Nuclear Reactor Regulation (NRR)/Division of Operating Reactor Licensing (DORL)
- Philip McKenna, Deputy Director, NRR/Division of Reactor Oversight (DRO)
- Justin Poole, NRR/DORL/Plant Licensing Branch III (LPL3)
- Jeff Whited, Branch Chief, NRR/DORL/LPL3
- Ngola Otto, Project Manager, NRR/DORL/Licensing Projects Branch
- Luis Cruz Rosado, Project Manager, DORL/LPL3
- Jessica Hammock, Project Manager, Division of New and Renewal Licenses, License Renewal Projects Branch
- Carolyn Wolf, Office of Congressional Affairs
- Sophie Holiday, Senior Emergency Response Coordinator, Office of Nuclear Security and Incident Response (NSIR)/Division of Preparedness and Response (DPR)
- Marlayna Doell, Project Manager, Office of Nuclear Material Safety and Safeguards (NMSS)/Division of Decommissioning, Uranium Recovery, and Waste Programs (DUWP)/Reactor Decommissioning Branch (RDB)
- Tanya Hood, Project Manager, NMSS/DUWP/RDB
- Laura Willingham, Environmental Project Manager, NMSS/Division of Rulemaking, Environmental, and Financial Support (REFS)/Environmental Review New Reactors Branch (ENRB)
- Mary Richmond, Environmental Project Manager, REFS/ENRB
- Michael Waters, Director, Division of Preparedness and Response, NSIR
- Kathryn Brock, Director, Division of Preparedness and Response, NSIR
- Michael Norris, Senior Emergency Preparedness Specialist, NSIR/DPR/Reactor Licensing Branch (RLB)
- Jessie Quichocho, Branch Chief, NSIR/DPR/RLB
- Keith Miller, Emergency Preparedness Specialist, NSIR/DPR/RLB
- Charles Murray, Emergency Preparedness Specialist, NSIR/DPR/Policy and Oversight Branch
- Jeffrey Herrera, Emergency Preparedness Specialist, NSIR/DPR/RLB
- Michael Spencer, Senior Attorney, Office of the General Counsel (OGC)
- Julie Ezell, OGC
- Todd Keene, Executive Technical Assistant, Office of the Executive Director for Operations
- Scott Burnell, Office of Public Affairs
- Jason Kozal, Region III, Director of the Division of Operating Reactor Safety
- April Nguyen, Region III
- Valerie Myers, Senior Health Physicists, Region III/Division of Radiological Safety and Security/Decommissioning Reactor ISFSI Health Physics Branch
- Allan Barker, Regional Governmental Liaison Officer, Region III

Enclosure

- Herral Logaras, Regional Governmental Liaison Specialist, Region III
- Prema Chandrathil, Office of Public Affairs, Region III
- Viktoria Mitlyng, Office of Public Affairs, Region III

Holtec Decommissioning International, LLC (Holtec)

- Jean Flemming, Vice President of Licensing, Regulatory Affairs and Probabilistic Safety Analysis
- James P. Miksa, Manager, Regulatory Assurance Engineer for Palisades
- Michael Schultheis, Manager of Regulatory Assurance for Palisades

Members of the Public (who identified themselves)

- Terry Alsterda
- David Asselin, Michigan Department of Environment, Great Lakes, and Energy (EGLE)
- Gregory Baustian
- Jana Bergman
- Jan Boudart
- Mike Chappell
- Sarah Clark
- Colleen Coffey, Department of Energy (DOE)
- Shasta Cole
- Henrietta Cosentino
- Nicholas Culp
- Ashley Demeter
- Brian Disette
- Kurt Doroh, Van Buren County, Michigan
- John Egdorf
- Danica Ewing
- Ed Everett
- Jacob Fakory, New Jersey Department of the Environmental Protection (DEP)
- John Faul
- Bruce Fetzer
- Ryan Fuld, DOE
- Mike Gallagher
- Timothy Gardner (Reuters)
- Greg Gothard, EGLE
- Carlyn Greene
- Veena Gubbi, New Jersey DEP
- Alexis Hall
- Leah Hare
- David Hills
- Ray Hochsprung, Van Buren County, Michigan
- Jerry Humphreys, New Jersey DEP
- Tom Jeffers
- Jody
- Mary Judnich, Stabenow.senate.gov
- Kevin Kamps, Beyond Nuclear
- Michael Keegan
- Lisa Kindschy, Licensing and Regulatory Affairs, Michigan

- Michael Lee
- Terry Lodge
- Edwin Lyman
- Cynthia Madansky
- Eric Magnuson
- Scott Martzke, Michigan State Police (MSP)
- Sheri McWhirter
- Kami Miller
- Zachary Morris
- Jennifer Pema, DOE
- Bette Pierman
- Commissioner Pitchford
- Jeffrey Quinn
- Dillon Reed
- Brenna Roos, MSP
- Debra Schneck
- Linda Sahagian
- Melissa Shahzadeh, The Council of State Governments
- Rosemary Shields
- Dave E. Simonelli
- Craig Smith, Constellation Nuclear
- Adam Stein, Breakthrough Institute
- Doug Stewart
- Phillip Stewart, Reuters
- Kathy Wagaman, South Haven Chamber of Commerce, Michigan
- Jonathan Zeitz, New Jersey DEP

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RidsNsrDpr Resource	SBurnell, OPA	VMitlyng, RIII

ADAMS Accession Nos.:

Package: ML24089A246

Meeting Summary: ML24089A247

Meeting Presentation: ML24074A330

***via eConcurrence**

NRC-001

OFFICE	NRR/DORL/LLPB/PM*	NRR/DORL/LLPB/LA*	NRR/DORL/LPL3/BC*	NRR/DORL/LLPB/PM*
NAME	Notto	DHarrison	JWhited	NOtto
DATE	4/2/2024	4/5/2024	4/8/2024	4/8/2024

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