



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

February 26, 2024

LICENSEE: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC

FACILITIES: PALISADES NUCLEAR PLANT

SUBJECT: SUMMARY OF FEBRUARY 6, 2024, PRE-SUBMITTAL MEETING WITH
HOLTEC DECOMMISSIONING INTERNATIONAL, LLC REGARDING
TECHNICAL SPECIFICATIONS ADMINISTRATIVE CONTROLS AND QUALITY
ASSURANCE PROGRAM

On February 6, 2024, the U.S. Nuclear Regulatory Commission (NRC) staff held a virtual meeting with representatives of Holtec Decommissioning International (HDI), LLC (Holtec, the licensee). The NRC staff, Holtec representatives, and members of the public participated remotely via Microsoft Teams. The purpose of this meeting was for the NRC staff and Holtec representatives to discuss a proposed license amendment request (LAR) for changes to the technical specifications (TSs) administrative controls, as well as to discuss Holtec's plans for a quality assurance (QA) program to support resumption of power operations at Palisades Nuclear Plant (PNP). Holtec later submitted the administrative controls TS LAR on February 9, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24040A089). In addition, Holtec plans to submit its operating QA plan in April 2024, as well as provide additional submittals as listed below to support resumption of power operations at PNP. The meeting notice and agenda dated January 14, 2024, are available in ADAMS at Accession No. ML24036A285. A list of attendees is provided as an enclosure. Holtec's presentation is available in ADAMS at Accession No. ML24036A108.

Holtec representatives began the presentation with an overview and background of the PNP planned restart activities, the purpose for requesting the administrative controls TS changes, a description of the previous submittals, and general expected outcome for the meeting. As part of the background information, Holtec representatives highlighted two recent submittals: the license transfer application for PNP operational authority, which was submitted on December 6, 2023 (ADAMS Accession No. ML23340A161), and a LAR to restore the power operations TS, which was submitted on December 14, 2023 (ADAMS Accession No. ML23348A148). Holtec representatives also indicated that they plan to pursue subsequent license renewal for PNP; the current 20-year license renewal ends in March 2031.

For the administrative TS discussion, Holtec representatives described the reason for the proposed changes, provided a description of each change considering the applicable regulatory requirements, and discussed the precedent, need for an environmental assessment, and sections proposed for reinstatement. As part of this discussion, the NRC staff asked about the planned submittal referencing PNP Amendment No. 271 as opposed to PNP Amendment No. 266 related to the administrative controls because Amendment No. 266 contained more detailed changes to the operating administrative controls TS. Holtec representatives indicated that they plan to reference Amendment No. 266 in the submittal.

Holtec indicated that the following submittals are expected in relation to the PNP resumption of operations:

- Request to reinstate the operating level Emergency Preparedness Plan – March 2024
- Update to the Post-Shutdown Decommissioning Activities Report (PSDAR) – March 2024
- Letter to the NRC regarding readiness to transition to an operating status – August 2025

There were also discussions on plans to restore previous regulatory commitments for compliance with NRC orders and industry initiatives, including the inservice inspection program and emergency operations procedures.

For the QA program discussion, Holtec representatives provided an explanation of the PNP transition from the pre-shutdown Entergy Quality Assurance Program Manual (QAPM) to the HDI Decommissioning Quality Assurance Plan (DQAP). The NRC staff asked if the pre-shutdown PNP-specific QA manual was issued by Entergy or HDI. The Holtec representative explained that the PNP-specific QA manual was issued by Entergy. The NRC staff stated that reuse of the Entergy QAPM by Holtec to support restart efforts without tailoring the QA program to the current licensee and site activities is not appropriate.

Holtec representatives stated that Holtec plans to submit the PNP power operations QAPM for NRC review by the second quarter of 2024. The NRC staff asked Holtec to clarify when the PNP power operations QAPM would be in effect. Holtec representatives stated that the plan is to have the QAPM in effect after the plant is at power and that prior to that, the official QA program in effect is the Holtec DQAP. The NRC staff asked about the issue of enforcement of QA during the transitional phase at PNP. Specifically, which quality controls would be applied to the efforts associated with the potential resumption of operations at PNP since the DQAP does not have adequate coverage of safety-related systems, structures, and components. At the end of the QA discussion, there was an understanding that another meeting may be needed before Holtec submits its QAPM.

There were several comments from members of the public during the public questions and comments portion of the meeting. There were some comments in favor of moving forward with the PNP restart activities for reasons related to providing local jobs, tax revenue, climate goals, and a clean energy source. Others indicated that the meeting provided an opportunity to answer public questions about the status of the PNP restart efforts. There was also strong support for restarting PNP to supplement power that will be lost from a coal plant that is going offline in August 2025.

Other comments were against moving forward with the PNP restart activities for reasons such concerns about the NRC not being able to enforce QA at PNP, environmental issues, and discussed their plans to intervene as the project moves forward. Others expressed a need for a special meeting to discuss all known safety issues at PNP prior to any potential resumption of operations. 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 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

February 6, 2024, Meeting with Holtec Decommissioning International, LLC
Regarding Power Operations Administrative Controls Technical Specifications
and Quality Assurance Program

Nuclear Regulatory Commission

- Jamie Heisserer, 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
- Jeff Whited, Branch Chief, NRR/DORL/Plant Licensing Branch III
- Ngola Otto, Project Manager, NRR/DORL/Licensing Projects Branch
- Carolyn Wolf, Office of Congressional Affairs
- Sophie Holiday, Senior Emergency Response Coordinator, Office of Nuclear Security and Incident Response/Division of Preparedness and Response
- 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, NMSS/REFS/ENRB
- Clint Ashley, NRR/Division of Safety Systems (DSS)/Technical Specifications Branch (STSB)
- Craig Harbuck, NRR/DSS/STSB
- Steve Smith, NRR/DSS/STSB
- Andrea Russell, NRR/DSS/STSB
- Matthew Hamm, NRR/DSS/STSB
- Kerri Kavanagh, Branch Chief, DRO/Quality Assurance and Vendor Inspection Branch
- Deanna Zhang, NRR/DRO/Quality Assurance and Vendor Inspection Branch
- Michael Spencer, Senior Attorney, Office of the General Counsel
- Jason Kozal, Region III, Director of the Division of Operating Reactor Safety,
- Valerie Myers, Senior Health Physicists, Region III/Division of Radiological Safety and Security/Decommissioning Reactor ISFSI Health Physics Branch
- Allan Barker, Region III/Regional Governmental Liaison Officer
- Harral Logaras, Region III/ Regional Governmental Liaison Specialist
- Prema Chandrathil, Region III/Office of Public Affairs
- Viktoria Mitlyng, Region III/Office of Public Affairs
- Robert Krsek, Technical Assistant, NRC Advisory Committee for Reactor Safeguards

Enclosure

Holtec Decommissioning International, LLC (Holtec)

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

Public

- Terry Alsterda
- Lee Blackburn
- Nick Capone, MI House
- Brandon Clark
- Colleen Coffey, Department of Energy
- Milton Concepcion, Constellation Nuclear
- Shawn Connors
- Cyler N Conrad, Pacific Northwest National Laboratory
- Jordan Bauer
- Gregory Baustian
- Jana Bergman
- Gerry Bundle, Board Chair for the Wolverine Cooperative
- Kurt Doroh, Van Buren County, MI
- Jacquelyn Drechsler
- Timothy Enfinger, GE Hitachi Nuclear
- John Faul, County Administrator
- Carolyn Ferry, SBC Global
- Bruce Fetzer
- Darby Fetzer
- Remy Fortin
- Allison Fuhrman, MI House
- Ryan Fuld, Department of Energy
- Mike Gallagher, Energy Consulting
- Regina B Genovese
- Julie Ginevan, Licensing and Regulatory Affairs, Michigan
- Greg Gothard, Michigan Government
- Griffin Graham, South Haven Michigan Government
- Carlyn Greene
- Andrew Green
- Ray Hochsprung, Van Buren County, Michigan
- James Hopf
- Jaclyn Hulst
- Justin Johnson, Allegan County
- Mary Judnich, Stabenow.senate.gov
- Kevin Kamps, Beyond Nuclear
- Michael Keegan
- Lisa Kindschy, Licensing and Regulatory Affairs, Michigan

- Alvin Leong, Department of Energy
- George Mack, Department of Energy
- Alan Medsker
- Traven Michaels
- Roger Mills, DTE Energy
- Zachary Morris, Van Buren County
- Bill Noval, Holtec
- Ronald O'Connell
- Tom Palmisano
- Justin Palthe
- Jennifer Pema, Department of Energy
- Joshua Przygocki, Senate.michigan.gov
- Lisa Ransler, Van Buren County, Michigan
- Dillon Reed
- Ross Stein
- Robert G Schaaf, Pacific Northwest National Laboratory
- Kraig Schultz
- Grant Schwab, Detroit news
- Isuru Seneviratne
- Dale Shugars
- Melissa Shahzadeh, The Council of State Governments
- Dave E. Simonelli
- Jamie Sloan
- Craig Smith, Constellation Nuclear
- Melissa Smith, Department of Energy
- Travis Smith, Senior Health Physicist, University of Michigan
- Jim Storey, Allegan County
- Kathy Wagaman, South Haven Michigan
- Derek Weldon, Van Buren County, Michigan
- Craig Wright
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Others Registered for the Meeting

Jordan Bauer, Berrien County

Westley Beck, Holtec

Jana Bergman

Annie Brown

Gerry Bundle

Michael Callahan

Nick Culp

Ken Erwin, Department of Energy

Brian Dissette, Berrien County

Ben Dodson
Lichao Du
Graham Filler
Julie Ginevan, Licensing and Regulatory Affairs, Michigan
Richard Godfrey
Megan Haan
Kate Hosier, South Haven, Michigan Govt.
Mike Johnston, Michigan Manufacturers Association
Michael Lee
Mari Inoue
Michael Mlynarek, Holtec
Mick Middaugh
Eric Magnuson
David Manson, Van Buren Intermediate School District
Alfred Meyer
Jon Okafor, Department of Energy
Jeffrey Quinn
Ryan Pickering
Craig Smith
Lonzey Taylor
Alicia Williamson, Department of Energy
Craig Wright
J. Vail
Keith Vermillion
Jennifer Zordan

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TECHNICAL SPECIFICATIONS ADMINISTRATIVE CONTROLS AND QUALITY
ASSURANCE PROGRAM DATED: FEBRUARY 26, 2024

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JWhited, NRR	JKozal, RIII
JPoole, NRR	VMyers, RIII
NOtto, NRR	ABarker, RIII
PMcKenna, NRR	PChandrathil, RIII
ARussell, NRR	VMitlyng, RIII
CAshley, NRR	

ADAMS Accession Nos.:

Package: ML24051A102

Meeting Presentation: ML24036A108

Meeting Summary: ML24051A094

OFFICE	NRR/DORL/LLPB/PM*	NRR/DORL/LLPB/LA*	NRR/DORL/LPL3/BC*	NRR/DORL/LLPB/PM*
NAME	NOtto	DHarrison	JWhited	NOtto
DATE	2/20/2024	2/20/2024	2/26/2024	2/26/2024

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