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HDI PNP 2024-017

RFOL Appendix B 5.4.1

April 23, 2024

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Palisades Nuclear Plant
Docket No. 50-255
Renewed Facility Operating License No. DPR-20

Subject: 2023 Annual Non-Radiological Environmental Operating Report

In accordance with the requirements of Palisades Nuclear Plant (PNP) Renewed Facility Operating License (RFOL) Appendix B, *Environmental Protection Plan (Non-Radiological)*, section 5.4.1, *Routine Reports*, Holtec Decommissioning International, LLC (HDI) on behalf of Holtec Palisades, LLC (Holtec Palisades) is submitting the 2023 Annual Non-Radiological Environmental Operating Report for PNP. The enclosed report describes the implementation of the Environmental Protection Plan from January 1, 2023, through December 31, 2023.

This letter contains no new and no revised regulatory commitments.

Should you have any questions or require additional information, please contact Jim Miksa, Regulatory Assurance Manager at (269) 764-2945.

Respectfully,

William
Noval

Digitally signed by William Noval
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William Noval
Director Regulatory Affairs
Holtec Decommissioning International, LLC

Enclosure: Palisades Nuclear Plant Annual Non-Radiological Environmental Operating Report

Attachment 1: Herbicide and Pesticide Treatments

cc: NRC Region III Regional Administrator
NRC Decommissioning Inspector – Palisades Nuclear Plant
NRC NMSS Project Manager – Palisades Nuclear Plant

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Enclosure to
HDI PNP 2024-017
Palisades Nuclear Plant
Annual Non-Radiological Environmental Operating Report

2023 ANNUAL NON-RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

1.0 BACKGROUND

Appendix B of the Renewed Facility Operating License for the Palisades Nuclear Plant (PNP) requires the submittal of an annual environmental operating report to the Nuclear Regulatory Commission (NRC), describing the implementation of the Environmental Protection Plan (EPP) during the previous year. The reporting period is January 1, 2023, through December 31, 2023.

The PNP operated for 0 hours and produced a net total of 0 MWh during 2023. Palisades was removed from service on May 20, 2022 at 15:57.

2.0 ENVIRONMENTAL IMPACT EVALUATIONS

During 2023, there was one project that was reviewed in the Environmental Review process in accordance with DSP-EN-001. The Engineering Changes are as follows:

Engineering Change (EC), CCDECP-PAL-0005 was performed to reconfigure the security search area. This enhanced the Protection Area (PA) boundary in the search area by reducing the need for enhanced monitoring, installation of a gravity roller bin return system, and replacement of the enhanced monitoring Network Video Recorder (NVR) and associated cameras as well as other minor enhancements. All work was performed in previously disturbed and paved areas within the PA. No state or environmental permitting was required and there were no environmental impacts or concerns. The EC and fence modification were completed in 2023.

There were no additional changes, tests, or experiments that involved un-reviewed environmental questions or EPP changes.

3.0 ADDITIONAL ACTIVITIES AUTHORIZED UNDER NPDES

In-accordance with the department of Environment, Great Lakes, and Energy (EGLE) requirements a National Pollutant Discharge Elimination System (NPDES) permit application renewal was applied for and verified as being received by the State of Michigan prior to required due dates. Palisades' new NPDES permit has not been received from the State of Michigan at this time; however, by submitting by the required due date, in accordance with (IAW) the process Palisades is still covered under the old NPDES permit. No changes at this time are expected to the permit. No additional activities were authorized under the National Pollutant Discharge Elimination System (NPDES) permit. As of this report being written, the EGLE, has contacted the site with a number of questions, as they are in the process of submitting a draft of the new NPDES permit to the site for review as part of the renewal process. A new permit is expected to be implemented in 2024.

The Air Operating Permit renewal application package was submitted and received by the State prior to the required due date in accordance with Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A.451 of 1994 and the federal Clean Air Act of 1990. Palisades has received confirmation that the Air Operating Permit application is

administratively complete, has been granted an application shield pursuant to Rule 217(1)(a) from EGLE, and therefore the existing permit will not expire until the renewal permit has been issued or denied.

4.0 UNUSUAL ENVIRONMENTAL EVENTS

No unusual environmental events occurred during 2023.

5.0 ENVIRONMENTAL MONITORING

The site Operations crew, along with the Security department treated areas of the property for vegetation control and security needs during 2023. Herbicides were not applied to the transmission line exit corridor in 2023. The application of herbicides and pesticides is documented in Attachment 1.

The site continues to purchase an over-the-counter solution of herbicide for weed control, that was approved by Chemistry/Environmental. The approval was given in accordance with site procedure Admin 4.22, Environmental Protection Plan (Non-Radiological). Only premixed ready-to use products are purchased and applied. If the product being used is changed, approval prior to use is required by the Chemistry/Environmental department. If desired to use concentrated products, a certified vendor will be used for the application IAW industrial site application requirements.

6.0 NON-ROUTINE REPORTS

During 2023, no non-routine reports were generated.

HERBICIDE & PESTICIDE TREATMENTS

Company: Holtec – Palisades
Operations and Security
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Date of Treatment:	May 18, 2023	(36.61oz Active Ingredient) (1.33 gallons total applied)
	June 14,2023	(16.2oz Active Ingredient) (3.99 gallons total applied)
	June 15, 2023	(10.8oz Active Ingredient) (2.66 gallons total applied)
	June 28, 2023	(5.31 oz Active Ingredient) (0.67 gallons total applied)
	July 3,2023	(48.6oz Active Ingredient) (11.97 gallons total applied)
	July 7, 2023	(16.2oz Active Ingredient) (3.99 gallons total applied)
	July 10, 2023	(10.8oz Active Ingredient) (2.66 gallons total applied)
	July 19, 2023	(10.8oz Active ingredient) (2.66 gallons total applied)
	July 20, 2023	(5.4oz Active Ingredient) (1.33 gallons total applied)
	July 22, 2023	(10.8oz Active Ingredient) (2.66 gallons total applied)
	July 25, 2023	10.8oz Active Ingredient) (2.66 gallons total applied)
	July 26, 2023	(21.6 oz. Active Ingredient) (5.32 gallons total applied)
	August 1, 2023	(5.4oz Active Ingredient) (1.33 gallons total applied)
	August 2, 2023	(5.4 oz. Active Ingredient) (1.33 gallons total applied)
	August 4, 2023	(54 oz Active Ingredient) (13.3 gallons total applied)
	August 10,2023	(5.4oz Active Ingredient) (1.33 gallons total applied)
	August 16, 2023	(5.4oz Active Ingredient) (1.33 gallons total applied)
	August 23, 2023	(5.15 oz. Active Ingredient) (1 gallon total applied)
	September 5, 2023	(5.4oz Active Ingredient) (1.33 gallons total applied)
	September 30, 2023	(16.2oz Active Ingredient) (3.99 gallons total applied)
	October 1, 2023	(16.2oz Active Ingredient)

(3.99 gallons total applied)

Commercial Names of Products in Solution:

Roundup® Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II, Spectracide Weed & Grass, Ortho Home Defense Insect Killer for Indoor & Perimeter2

Chemical Names of Products:

Roundup® Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II -

Nonanoic and related fatty acids; {Pelargonic and related fatty acids}

Isopropylamine salt of N-(phosphonomethyl)glycine; {Isopropylamine salt of glyphosate}

Ammonium salt of 2-[4,5-dihydro-4-methyl-4-(1-methyl)-5-oxo-1H-imidazol-2-yl]-5-methyl-3-pyridinecarboxylic acid; {Ammonium salt of imazapic}

Spectracide Weed & Grass Diquat dibromide; Fluazifop-p-butyl; Dicamba, dimethylamine salt

Ortho Home Defense Insect Killer for Indoor & Perimeter2: Bifenthrin; Cypermethrin

Concentration of Active Ingredient in Field Use Mix:

4.06 oz of active ingredient per 1 gallon (Roundup® Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II) applied to 300 square feet.

36.61oz of active ingredient per 1.33 gallons (Spectracide Weed & Grass) applied to 300 square feet.

5.31oz of active ingredient per 0.67 gallons (Ortho Home Defense Insect Killer for Indoor & Perimeter2) applied to 300 square feet.

Diluting Substance:

No dilution was performed for Roundup Ready-to-use Extended Control Weed & Grass Killer plus Weed Preventer II, Spectracide Weed and Grass, and Ortho Home Defense Insect Killer for Indoor and Perimeter2 as products are purchased in ready to use concentrations.

Rate of Application:

1 gallon per 300 square feet liquid application (Roundup® Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II)

Total Amount Used:

68.83 gallons total volume used for liquid treatment of roundup ready-to-use extended control weed & Grass Killer Plus Weed Preventer II (280.55 oz. of active ingredient).

1.33 gallons total volume used for liquid treatment of Spectracide Weed & Grass (36.61 oz of active ingredient).

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0.67 gallons total volume used for liquid treatment of Ortho Home Defense Insect Killer for Indoor & perimeter² (5.31oz active ingredient).

Method of Application:

Hand sprayer for liquids

Frequency of Application:

Throughout the year spot treatments as needed

Location:

Along and near roadways, fence lines, walkways, parking lots, containment areas, substations, cooling towers, protected area, and microwave zones.

Purpose of Treatment:

Fertilizer, control of weed species, crabgrass, nuisance vegetation, nuisance broadleaf vegetation