

**From:** [Marlayna Doell](#)  
**To:** [James Miksa](#)  
**Subject:** Draft RAIs for OL TS LAR  
**Date:** Thursday, June 6, 2024 7:58:00 AM  
**Attachments:** [DRAFT REQUEST FOR ADDITIONAL INFORMATION - Palisades Operating TS LAR.docx](#)  
**Importance:** High

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Hi Jim,

As discussed, please find attached a draft version of the RAIs on the operating TS LAR in support of tomorrow's clarification call. Please let me know if you have any questions in the meantime and talk to you tomorrow!

Cheers,  
Marlayna

[Marlayna Vaaler Doell](#)

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DRAFT REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO THE LICENSE AMENDMENT REQUEST TO REINSTATE  
THE OPERATING TECHNICAL SPECIFICATIONS  
HOLTEC DECOMMISSIONING INTERNATIONAL, LLC  
PALISADES NUCLEAR PLANT  
DOCKET NO. 50-255

Question 1

The LAR Table of Contents refers to section 3.1.2, "Proposed Changes to the Permanently Defueled Technical Specifications," which appears to be an editorial error because it is listed within section 3.2, "Evaluation of the Proposed Change." It appears to the NRC staff that it should be numbered 3.2.2. This potential numbering error also appears to be present in the body of the LAR. The NRC staff requests the licensee review and make corrections to the LAR, as appropriate, because the NRC staff's evaluation will likely refer to this LAR section by number and title.

Question 2

In LAR Enclosure Section 2.1, "Reason for Proposed Change," the licensee explained that this LAR is needed to reinstate the PNP TS that were in effect just prior to the 10 CFR 50.82(a)(1) certifications to support returning PNP to a power operations licensing basis. Proposed changes to the PNP TS are described in LAR Enclosure Section 3.2.2, "Proposed Changes to the Permanently Defueled Technical Specifications [PDTS]." The LAR Enclosure Section 3.2.2 is arranged in a table format that summarizes the proposed changes to each affected PNP TS Section and provides a basis for the proposed changes.

The basis for the proposed changes typically states, "this TS is proposed for reinstatement in its entirety to that which was in effect prior to the 10 CFR 50.82(a)(1) certification to restore the PNP power operations renewed facility operating license." In addition, the basis for most proposed changes typically clarifies that the TS "is reinstated as it existed in the previously approved TS prior to Amendment 272 [PDTS], to reflect the power operation condition of the plant." However, a statement about Amendment 272 is not found in the basis description for the following TS sections: 1.2, 1.3, 1.4, 2.0, 3.0 (LCO), 5.6.2, and 5.6.3.

The NRC staff believe that referencing Amendment 272 (e.g., see basis for TS 3.0 Surveillance Requirement (SR) Applicability) provides information that supports and clarifies the basis for the proposed changes to the PDTS. Therefore, the NRC staff requests the licensee review the basis for the proposed changes to the TS Sections identified above and explain why reference to Amendment 272 as part of the basis discussion was not included or make any corrections to the LAR to include reference to Amendment 272, where appropriate.

Question 3

In LAR Enclosure Section 2.1, "Reason for Proposed Change," the licensee explained that this LAR is needed to reinstate the PNP TS that were in effect just prior to the 10 CFR 50.82(a)(1)

certifications to support returning PNP to a power operations licensing basis. In LAR Enclosure Section 3.2.2, "TS Section 3.7, Plant Systems," the licensee explained that the TSs within TS Section 3.7 are proposed for reinstatement in their entirety to that which was in effect prior to the 10 CFR 50.82(a)(1) certifications, with a few exceptions. The exceptions are that TS 3.7.14, TS 3.7.15, and TS 3.7.16 were modified (see LAR basis for change) to ensure they were reinstated in their entirety, as they existed in the previously approved TS prior to Amendment 272.

The basis for the proposed changes to TS 3.7.14, TS 3.7.15, and TS 3.7.16, does not refer to the "TS that were in effect prior to the 10 CFR 50.82(a)(1) certifications." It appears to the NRC staff that both statements have been used in the LAR "basis" discussion for other TS changes and both statements should be applicable here as well. Therefore, the NRC staff requests the licensee review the basis for the proposed changes to the TS Sections identified above and explain why reference to 10 CFR 50.82(a)(1) certifications as part of the basis discussion was not included or make any corrections to the LAR to include reference to 10 CFR 50.82(a)(1) certifications, where appropriate.

#### Question 4

LAR Enclosure Section 3.2.2, "TS Section 3.1, Reactivity Control Systems," states, "TS Section 3.1 is proposed for reinstatement in its entirety. Thus, a markup of this TS section is not provided." However, it appears that not all of TS Section 3.1 is being reinstated in its entirety. For example, TS 3.1.4 is being reinstated with revision that is related to a note in SR 3.1.4.3. Therefore, the NRC staff requests that the licensee address this apparent inconsistency in stating TS Section 3.1 is proposed for reinstatement in its entirety given that there is revision to TS 3.1.4.

#### Question 5

The LAR does not identify if there were any nonconservative technical specifications (see RG 1.239, ML20294A510) entered in the Palisades corrective action process prior to decommissioning that were subsequently assessed as no longer in need of correction due to docketing of 10 CFR 50.82(a)(1) certifications (permanent cessation of operations). For any nonconservative technical specifications subject to this situation, the NRC staff requests the licensee to evaluate its applicability to the proposed power operations technical specifications and to include a discussion of plans to complete the corrective action(s), as appropriate.

#### Question 6

The LAR description of changes for applicable TS sections typically includes a statement regarding the TS Bases such as, "The corresponding TS Bases are also reinstated to reflect these changes." Bases changes are not mentioned in LAR Enclosure Section 3.2.2, "TS Section 2.0, Safety Limits (SLs)," as they are for other applicable LAR TS sections. However, Bases revisions for TS Section 2.0 are provided in LAR Attachment 3 (Bases markups). Therefore, the NRC staff requests that the licensee address this apparent inconsistency regarding a Bases statement in LAR Enclosure Section 3.2.2 for TS Section 2.0 given that there are Bases revisions provided in LAR Attachment 3.

### Question 7

The title to LAR Enclosure Section 3.2.2, "TS Section 3.0, Limiting Conditions for Operation (LCO) Applicability," (emphasis added) is missing the word "Applicability." The NRC staff request the licensee review and make any necessary corrections to the LAR, as appropriate.

### Question 8

The staff request the licensee evaluate and correct the identified TS, as appropriate, for the following items associated with LAR enclosure attachments (i.e., TS markups and clean pages):

1. TS Table 3.3.8-1: The table heading contains a misspelled word i.e., "PARAMATER"
2. TS 3.4.6, Required Action C.2: the indent for the logical connector "OR" between "C.2.1 OR C.2.2" is not consistent with PNP TS 1.2 logical connector examples.
3. TS 3.5.1, Completion Time for Condition B: "hour" should be "hours"
4. TS 3.7.10, Condition E: the indent and underline (missing) for the logical connector "OR" is not consistent with the PNP TS 1.2 logical connector examples.
5. TS 3.7.11, Required Action D.2: the indent for the logical connector "AND" between "D.2.1 AND 2.2 AND D.2.3" is not consistent with PNP TS 1.2 logical connector examples.
6. TS 5.5.8.d: on retyped page 5.0-12, the indent for the title "Provisions for SG tube inspections. (continued)" is not consistent with the format for this specification.
7. TS 5.5.14: on retyped page 5.0-18, 1) the spacing between lines within paragraph 5.5.14.d.1 does not appear to be consistent with the formatting for this section and 2) there are paragraphs numbered as "di" "dii" "diii". This numbering scheme is not consistent with the numbering approach used in this section.
8. TS 5.6.5: the title "COLR (continued)" is not indented consistently (a few instances) with the indenting approach used in this section.
9. There are numerous instances where the ACTIONS table or the SURVEILLANCE REQUIREMENTS table is continued on the next page without the appropriate heading, for example, missing ACTIONS (continued) or SURVEILLANCE REQUIREMENTS (continued).

### Question 9

TS 5.5: On retyped pages 5.0-9, 5.0-15, and 5.0-16, please explain why Amendment No. 271 is listed as one of the previous Amendments in the bottom right corner?

### Question 10

The following items were identified in the Bases provided in the LAR Attachment 3. For each item the NRC staff requests that the licensee review and make any necessary corrections to the LAR, as appropriate.

1. The LAR contains PDTS Bases markups to section B 3.0. There are a couple instances where “red text” (e.g., inserted text with arrow detailing location) is placed on top of existing text that is not subject to change. This makes it difficult to read and should be fixed to ensure readability. For example, see Bases pages B 3.0-1, B 3.0-3, and B 3.0-4.
2. The LAR contains PDTS Bases markups to section B 3.1. On page B 3.1.3-3, the LCO description states "... the MTC to be  $< 0.5 \text{ E-4 } \otimes \rho / ^\circ\text{F}$  at  $\leq 2\% \text{ RTP} \dots$ ". It appears that it should state "... the MTC to be  $< 0.5 \text{ E-4 } \Delta \rho / ^\circ\text{F}$  at  $\leq 2\% \text{ RTP} \dots$ "(emphasis added).
3. The LAR contains PDTS Bases markups to section B 3.7.16. On page B 3.7.16-1 text was deleted as part of the PDTS that should (it appears) be reinstated to support power operation TS. For example, Bases B 3.7.16, "Spent Fuel Pool Storage," does not address storage of new (unirradiated) fuel assemblies. Storage of new (unirradiated) fuel assemblies is needed to support power operations TS and is included in LAR markups to proposed TS 4.3, "Fuel Storage." Bases B 3.7.16 text during power operations, just prior to defueled TSs, specified storage of "either new (nonirradiated) nuclear fuel assemblies, or used (irradiated) fuel assemblies...."