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TH17– NRR

Regulatory Perspectives on the Potential Restart of Facilities in Decommissioning and Lessons Learned from Palisades

Opening Remarks

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Panelists

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Previous Co-Chair, Restart Panels (Palisades, Crane, Duane Arnold)

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Agenda

- Opening Remarks
- Deciding to Restart a Reactor in Decommissioning
- Oversight Activities at Palisades
- Lessons Learned from the Restart of Palisades
- Bringing Those Lessons to Crane
- Ensuring Safety—The Mission
- Impacts on the Future of Nuclear Power

What Does Restart Mean?

- A plant enters decommissioning status by certifying that it permanently ceased power operations and fuel was permanently removed from the reactor vessel under 10 CFR 50.82(a)(1).
- The 10 CFR Part 50 license has not been terminated but is amended to reflect decommissioning status.
- To restart, a licensee would need to—
  - Gain NRC approval to restore the licensing basis of the plant to an operational status.
  - Return plant components to a status that supports safe operation.
  - Make any upgrades necessary to meet the proposed operational licensing basis.

Deciding to Restart a Reactor in Decommissioning

NRC Regulatory Path

- The NRC strategy for ensuring safe resumption of power operations includes licensing safety reviews, program oversight, and inspection activities.
- The NRC staff expects to evaluate a plant's readiness to restart when the licensee provides assurance that the plant is ready to operate at power.
- The NRC chartered a dedicated panel of experienced NRC leaders for each restarting plant. The primary objective of the panel is to proactively identify and promptly resolve any licensing, inspection, or regulatory challenges that concern the restarting plant.

NRC Regulatory Strategy—Licensing

- A plant's existing 10 CFR Part 50 license can be modified using the NRC's standard regulatory processes to reestablish the licensing basis.
- The licensee must ask for an exemption from 10 CFR 50.82(a)(2) and make a series of licensing requests requiring NRC approval.
- The NRC's review of submitted licensing actions will focus on changes from the plant's licensing basis that existed just before shutdown.

NRC Regulatory Strategy—Requests

- A licensee's regulatory requests may vary depending on the status of the facility and any additional changes that the licensee would like to make to the licensing basis, but there are some minimum submittals the NRC would expect:
  - To be exempt from 10 CFR 50.82(a)(2) requirements.
  - To revise the operating license and permanently defueled technical specifications to reflect resumption of power operations.
  - To revise the site emergency plan to support resumption of power operations.
  - To rescind decommissioning exemptions.
- If all NRC requirements are met, all licensing and regulatory actions will be issued on the same day but implemented on a mutually agreed-upon date. Upon implementation, the unit transitions from decommissioning status to operational status and enters the Reactor Oversight Process (ROP).

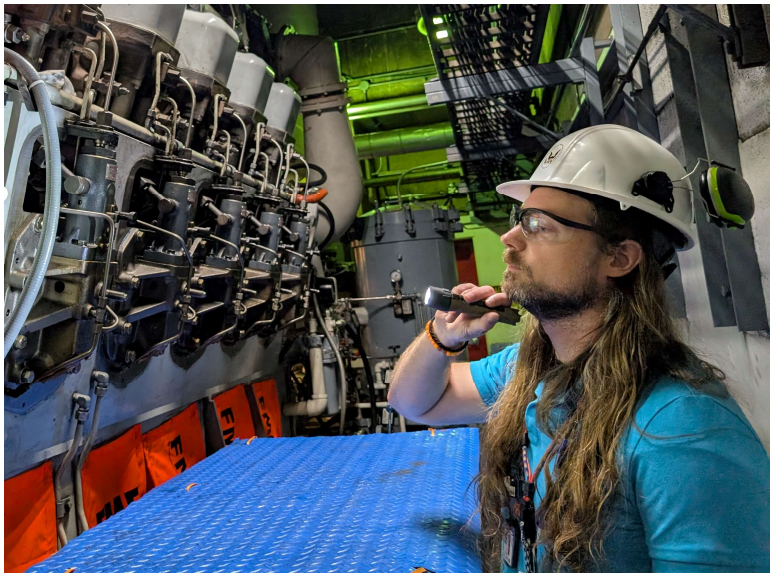
NRC Regulatory Strategy—QA/Environmental

- Quality Assurance (QA) Plan
  - The licensee will need to upgrade the existing decommissioning QA program to address quality activities conducted during the transition to potential restart, known as a transitional QA Program.
- Environmental Assessments (EAs)
  - The NRC staff will prepare EAs to assess environmental impacts of potential restart to meet its National Environmental Policy Act obligations associated with the combined actions.
  - The NRC staff will issue the draft EAs for public comment.
  - The results of the EAs will inform the outcome and schedule for the NRC licensing reviews.

NRC Regulatory Strategy—Oversight

- The NRC staff developed guidance for oversight of potential restart of operating reactor facilities from decommissioning based on similarities to previous plant restarts from extended shutdown and new reactor startups.
- The NRC staff developed Inspection Manual Chapter (IMC) 2562. It is generic to any plant restart.
- IMC 2562 describes the restart panel, transition between oversight processes, and development of an inspection plan.
- The Restart Panel informs the NRR Director and the Regional Administrator that the site will transfer to the ROP after issuance of the licensing action bundle and assessment of the licensee's readiness to transition to the ROP.

NRC Regulatory Strategy—Inspection



- The NRC region develops a high-level inspection plan that describes the types of activities to be inspected as they relate to the cornerstones of safety.
- Inspectors and technical experts execute a detailed, risk-informed inspection schedule to ensure assessment of all key areas of operational readiness.

Restart inspection activities are site specific.

Oversight Activities at Palisades

Oversight—Ensuring Safety

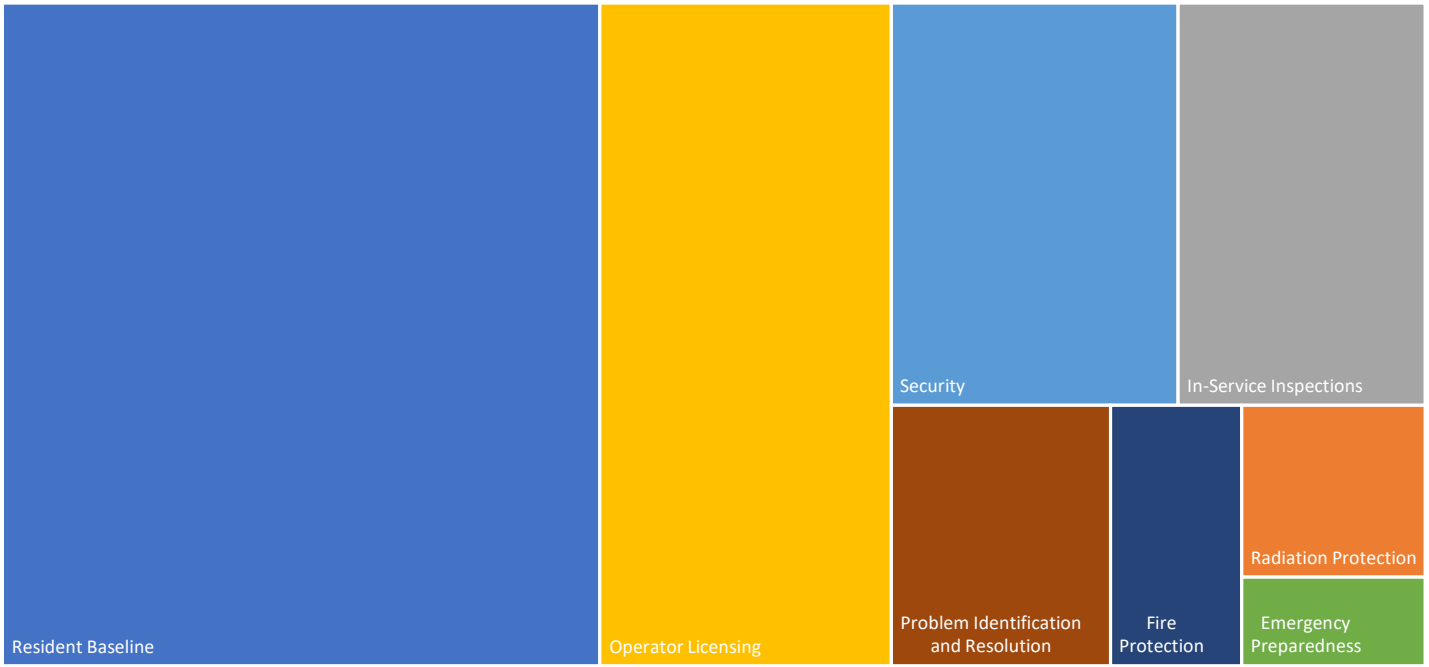
- Palisades transitioned to the ROP on August 25, 2025.
- As outlined in the ROP transition plan, the transition from restart inspections to operational inspections is an ongoing process.
- The NRC will continue to inspect restart activities under the structure of the ROP, and the site will start to accrue performance indicator data (in a phased approach).
- Restart inspections align with the site's start-up schedule. The inspectors perform real-time observations of in-field work, review completed documentation, and record their inspection activities in publicly available reports.

Inspection Focus

- Increase focus on return-to-service of high-risk systems that can impact the reactor safety strategic performance area.
- Review system modifications that can impact operational risk.
- Address historical equipment, design, and regulatory issues, which include open or deferred items before shutdown.
- Inspect reestablishment of programs, including the corrective action program and safety culture effectiveness.

Oversight by the Numbers

Over
5,400 Hours
of
Direct
Inspection
Effort



Lessons Learned from the Restart of Palisades

Lessons Learned—Licensing

- Transparent and open communication is key.
- Set up a transitional QA program.
- Sequence the issuance of the licensing actions so as to restore the operational licensing basis.
- Engage the Federal Emergency Management Agency (FEMA) early for the emergency preparedness review.
- Apply lessons to enhance public communications.
- Set up the project in the NRC's tracking/charging systems.

Lessons Learned—Oversight

- Site plans/status
  - Enable open communications with the licensee at all levels.
  - Establish early communications within the agency.
  - Staff resident inspectors and the restart inspection team early in the process to provide a day-to-day status of the plant and identify and address issues as early as possible.
- Inspection and technology tools
  - Incorporate flexible scoping of inspections.
  - Conduct remote reviews by agency subject-matter experts.
  - Use onsite preinspection information-gathering trips to help inspection teams understand the current site status.

Lessons Learned—Oversight (cont.)

- Outreach to external stakeholders
  - Hold local public meetings.
  - Conduct discussions with State and local governments.
  - Coordinate with other partner agencies at the Federal level.

Bringing Those Lessons to Crane

Applying Oversight Lessons Learned

- IMC 2562
- Resident site assignment on site tied to equipment restoration
- Phased approach for system restoration reviews
- Flexible inspection schedule
- Problem identification and resolution team inspection
- Flexible implementation of the ROP

Impacts on the Future of Nuclear Power

Tie to National Priorities

- Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024 (ADVANCE Act)

- Executive Order 14302, “Reinvigorating the Nuclear Industrial Base”

For Further Information

Find further information about the Palisades Restart Project at https://www.nrc.gov/info-finder/reactors/pali.html
Contact us at PalisadesRestartProject@nrc.gov

Find further information about the Crane Potential Restart Project at https://www.nrc.gov/info-finder/reactors/ccec
Contact us at CraneEnergyRestartProject@nrc.gov

Find further information about the Duane Arnold Potential Restart Project at https://www.nrc.gov/info-finder/reactors/duan
Contact us at DuaneArnoldRestartProject.Resource@nrc.gov