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10 CFR 50.12

PNP 2021-020

June 15, 2021

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

Subject: Request for Partial Exemption from Record Retention Requirements in
10 CFR 50.12

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

References: Entergy Nuclear Operations, Inc., (Entergy), letter to U.S. Nuclear Regulatory Commission (NRC), *Supplement to Certification of Permanent Cessation of Power Operations*, (ADAMS Accession No. ML17292A032), dated October 19, 2017

In accordance with Title 10 of the Code of Federal Regulations, Part 50, Section 12 (10 CFR 50.12), *Specific exemptions*, Entergy Nuclear Operations, Inc. (Entergy), on behalf of Palisades Nuclear Plant (PNP) requests an exemption from the following record retention requirements:

- 1) 10 CFR 50, Appendix B, Criterion XVII, *Quality Assurance Records*, which requires certain records to be retained consistent with applicable regulatory requirements for a duration established by the licensee;
- 2) 10 CFR 50. Section 59, *Changes, tests and experiments*, subparagraph (d)(3) (50.59(d)(3)), which requires certain records to be maintained until, *termination of an operating license issued under this part*; and
- 3) 10 CFR 50 Section 71, *Maintenance of records, making of reports*, paragraph (c) (50.71(c)), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

Entergy is not requesting an exemption from 10 CFR 50, Appendix A, Criterion 1, *Quality standards and records*, which requires certain records to be maintained, *throughout the life of*

the unit, because the PNP unit is not a General Design Criteria plant and therefore this regulation is not applicable to PNP.

In the referenced letter, in accordance with 10 CFR 50 Section 82, *Termination of license*, subparagraph (a)(1)(i) (50.82(a)(1)(i)), Entergy submitted, on behalf of PNP, a notification of its intent to permanently cease operations at PNP no later than May 31, 2022. Once PNP permanently ceases operations and submits its certification required by 10 CFR 50.82(a)(1)(ii), in accordance with 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for PNP will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel. Once granted, the requested exemption and application of the exemption will eliminate the requirement to maintain records that are no longer necessary due to the permanently shutdown status of PNP.

Entergy requests that the NRC grant this exemption request by May 31, 2022. Entergy will use the exemption, if granted, to eliminate the applicable records associated with structures, systems, components, and activities no longer required by the licensing basis due to the permanently shutdown status of PNP. Entergy requests that the granted exemption request become effective for PNP following the docketing of the certification required by 10 CFR 50.82(a)(1)(ii), currently expected to be docketed in June 2022 for PNP.

This letter contains no new commitments and no revised commitments.

Should you have any questions or require additional information, please contact Jim Miksa, regulatory assurance engineer at (269) 764-2945.

Respectfully,

**Philip
Couture**
Philip Couture

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Enclosure: Request for Partial Exemption from Record Retention Requirements

cc: NRC Region III Regional Administrator
NRC Senior Resident Inspector – Palisades Nuclear Plant
NRC Project Manager – Palisades Nuclear Plant

Enclosure to

PNP 2021-020

Request for Partial Exemption from Record Retention Requirements

REQUEST FOR PARTIAL EXEMPTION FROM RECORD RETENTION REQUIREMENTS

I. BACKGROUND

Entergy Nuclear Operations, Inc. (Entergy) is the licensee and holder of Renewed Facility Operating License Number DPR-20 for Palisades Nuclear Plant (PNP). By letter dated October 19, 2017 (Reference 1), in accordance with 10 CFR 50.82(a)(1)(i), Entergy notified the U.S. Nuclear Regulatory Commission (NRC) of its intention to permanently cease power operations at PNP by May 31, 2022. Once fuel has been permanently removed from the reactor vessel, Entergy will submit a written certification to the NRC in accordance with 10 CFR 50.82(a)(1)(ii), *that meets the requirements of 10 CFR 50.4(b)(9)*. Upon docketing this certification, the 10 CFR Part 50 license for PNP will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel, as specified in 10 CFR 50.82(a)(2).

PNP will transition to decommissioning after the spent fuel has been transferred from the reactor vessel to the spent fuel pool (SFP). The nuclear reactor and essentially all associated systems, structures, and components (SSCs) in the nuclear steam supply system and balance of plant that supported the generation of power will be abandoned in place and prepared for removal. SSCs that remain operable or functional are: 1) those required to support safe storage of spent fuel in the SFP; or 2) those that are needed to meet other regulatory requirements or are needed to support other site facilities (e.g., radwaste handling, heating, ventilation, and air conditioning (HVAC), etc.).

The decommissioning plans for PNP are described in the Post Shutdown Decommissioning Activities Report (PSDAR), submitted by Holtec Decommissioning International, LLC (HDI) to the NRC on December 23, 2020 (Reference 2), as required by 10 CFR 50.82(a)(4)(i), and are contingent on the consummation of the pending license transfer (Reference 3). Continued onsite management of spent fuel will be required because of the Department of Energy's failure to perform its spent fuel removal obligations under its contracts with Entergy. If granted, the exemption will be implemented once Entergy docketed for PNP the permanent cessation of operations and permanent removal of fuel from the reactor vessel. See the implementation section below for further details.

While Entergy intends to retain the records required by the PNP license as the project transitions from the current plant conditions to fully dismantled with the fuel in dry storage, the regulatory and business needs for maintenance of most of the records will be obviated. As the SSCs are removed from the licensing basis and the need to retain their associated records is, on a practical basis, eliminated, Entergy requests exemptions from the records retention requirements for PNP SSCs and historical activities that are no longer relevant. Such exemptions would eliminate the associated, unnecessary regulatory and economic burdens of retaining records for SSCs that are no longer part of the PNP licensing basis.

II. DETAILED DESCRIPTION

In accordance with 10 CFR 50.12, Entergy requests an exemption from the following record retention requirements for PNP:

- (1) 10 CFR 50, Appendix B, Criterion XVII, which requires certain records to be retained consistent with applicable regulatory requirements for a duration established by the licensee;
- (2) 10 CFR 50.59(d)(3), which requires certain records to be maintained until, *termination of an operating license issued under this part*, and
- (3) 10 CFR 50.71(c), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

The exemption is requested to allow Entergy to eliminate the requirement to maintain records that are no longer necessary or applicable due to the permanently defueled condition and decommissioning status of PNP. Specifically, Entergy proposes that the following records would no longer be retained:

- (1) Records associated with SSCs, and activities that were applicable to the nuclear unit, which are no longer required by the Part 50 licensing basis (e.g., removed from the Final Safety Analysis Report and/or Technical Specifications by appropriate change mechanisms); or
- (2) For SSCs associated with safe storage of fuel in the SFP, when spent nuclear fuel has been completely transferred from the SFP to dry storage, and the SFP is ready for demolition and the associated licensing bases are no longer effective.

Entergy is not requesting an exemption from 10 CFR 50, Appendix A, Criterion 1, which requires certain records to be maintained *throughout the life of the unit*, which is not applicable to PNP because the PNP unit is not a General Design Criteria plant. Nor is Entergy requesting an exemption associated with any record keeping requirements for storage of spent fuel at the PNP Independent Spent Fuel Storage Installations (ISFSIs) under 10 CFR 50, *Domestic Licensing of Production and Utilization Facilities*, the General License requirements of 10 CFR Part 72 (10 CFR 72), *Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste*, or for the other requirements of 10 CFR 50 or Renewed Facility Operating License Number DPR-20 as applicable to the decommissioning and dismantlement of PNP.

III. DISCUSSION

In order for an exemption to be granted from the requirements of 10 CFR Part 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c), the licensee must show that the requirements of 10 CFR 50.12(a)(1) are met and that special circumstances, as specified in 10 CFR 50.12(a)(2), exist. As discussed below, Entergy satisfies these standards for the requested exemptions.

IV. TECHNICAL EVALUATION

A. Nuclear Power Generation SSCs

The PNP nuclear steam supply system and balance of plant SSCs will be abandoned in place pending dismantlement. These SSCs will no longer be operable or maintained except as required to support safe storage of spent fuel in the SFP and other support needs described above. The general justification for eliminating records associated with that portion of the plant is straightforward in that these SSCs have been (or will be) removed from service, dismantled or demolished, and will not serve any PNP function regulated by the NRC.

Entergy recognizes that some records related to the nuclear steam supply system and balance of plant will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and the decommissioning activities are and will continue to be appropriately addressed through the license and current plant documents such as the Updated Final Safety Analysis Report (UFSAR) and Technical Specifications (TS). Except for future changes made through the applicable change process defined in the regulations (e.g., 10 CFR 50.48(f), 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a), 10 CFR 50.54(p), 10 CFR 50.54(q), etc.), these programmatic elements and their associated records are unaffected by the exemption request.

B. Spent Fuel Pool and Associated SSCs and Activities

Records necessary for spent fuel storage SSCs and activities will continue to be retained through the functional life of the SFP. Similar to the other plant records, once the SFP is emptied of fuel, drained and ready for demolition, there will be no safety-significant function or other regulatory need for retaining SFP related records. Also, similar to the power generation SSCs, Entergy recognizes that some records related to the SFP SSCs will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and the decommissioning activities are and will continue to be appropriately addressed through the license and current plant documents such as the UFSAR and TS. Except for future changes made through the applicable change process defined in the regulations (e.g., 10 CFR 50.48(f), 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a), 10 CFR 50.54(p), 10 CFR 50.54(q), etc.), these programmatic elements and their associated records are unaffected by the exemption request.

The requested exemption is consistent with the retention period for records of changes in the facility or spent fuel storage cask design implemented under 10 CFR Part 72 Section 48 (10 CFR 72.48), *Changes, Tests, and Experiments*. 10 CFR 72.48(d)(3)(i) specifically states that records are to be retained until ... *Spent fuel is no longer stored in the facility*. This is analogous to the condition when the fuel is no longer stored in the SFP and the SFP is ready for demolition.

C. Spent Fuel

Entergy is not requesting any exemption associated with retention of spent fuel records required by 10 CFR 50 and 10 CFR 72.

D. ISFSIs

Entergy is not requesting any exemption associated with the retention of records associated with the storage of spent fuel at the ISFSIs required by 10 CFR 72.

V. **PRECEDENTS**

This exemption request is consistent with similar exemption requests that have been approved recently by the NRC for other nuclear power reactor facilities beginning decommissioning. Specifically, the NRC granted similar exemptions to Zion Nuclear Power Station, Units 1 and 2 (Reference 4); Vermont Yankee Nuclear Power Plant (Reference 5); San Onofre Nuclear Generating Station, Units 1, 2, and 3 (Reference 6); Kewaunee Power Station (Reference 7); Oyster Creek Nuclear Generating Station (Reference 8); Pilgrim Nuclear Power Station (Reference 9); and Indian Point Nuclear Generating (Indian Point) Units 2 and 3 (Reference 10).

VI. **JUSTIFICATION FOR EXEMPTION AND SPECIAL CIRCUMSTANCES**

In accordance with 10 CFR 50.12, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of Part 50 which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. 10 CFR 50.12 also states that the Commission will not consider granting an exemption unless special circumstances are present.

As discussed below, the Entergy exemption request satisfies the provisions of 10 CFR 50.12.

A. The exemption is authorized by law

Paragraph 50.71(d)(2) allows for the granting of specific exemptions to the record retention requirements specified in the regulations. Paragraph 50.71(d)(2) states, in part: *...the retention period specified in the regulations in this part for such records shall apply unless the Commission, pursuant to 50.12 of this part, has granted a specific exemption from the record retention requirements specified in the regulations in this part.*

If the specific exemption requirements of 10 CFR 50.12 are satisfied, the exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, and 10 CFR 50.59(d)(3) is authorized by law. The request does not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, the exemptions are authorized by law.

B. The exemption will not present an undue risk to public health and safety

Removal of the underlying SSCs associated with the records from the PNP licensing bases has been or will be evaluated in accordance with the applicable change process defined in the regulations to have no adverse public health and safety impact. Elimination of associated records for these SSCs will have no additional impact.

The partial exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, Criterion XVII; and 10 CFR 50.59(d)(3), for the records described above is administrative in nature and will have no impact on any remaining decommissioning activities or on radiological effluents. The exemption will merely advance the schedule for no longer maintaining the specified records. Considering the content of these records, the elimination of these records on an advanced timetable will have no reasonable possibility of presenting any undue risk to the public health and safety.

C. The exemption is consistent with the common defense and security

The elimination of the recordkeeping requirements is administrative in nature and does not involve information or activities that could potentially impact the common defense and security of the United States. Upon removal of the affected SSCs from the PNP licensing basis, the records have no functional purpose relative to maintaining the safe operation of the SSCs nor to maintaining conditions that would affect the ongoing health and safety of workers or the public. Rather, the exemption request is administrative in nature and would merely advance the current schedule for destruction of the specified records. Therefore, the partial exemption from the recordkeeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B; and 10 CFR 50.59(d)(3), for the types of records described above is consistent with the common defense and security.

D. Special circumstances

In accordance with 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption to its regulations unless special circumstances are present. Special circumstances are present as discussed below.

1. **10 CFR 50.12(a)(2)(ii): Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.**

Appendix B of 10 CFR 50, Criterion XVII, states in part: *Sufficient records shall be maintained to furnish evidence of activities affecting quality.*

Paragraph 50.59(d)(3) states in part: *The records of changes in the facility must be maintained until the termination of an operating license issued under this part...*

Paragraph 50.71(c), states in part: *Records that are required by the regulations in this part or Part 52 of this chapter, by license condition, or by technical specifications must be retained for the period specified by the appropriate regulation, license condition, or technical specification. If a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license...*

The common and underlying purpose for the records related regulations cited above is to ensure that the licensing and design basis of the facility is understood, documented, preserved and retrievable relative to establishing and maintaining the SSC's safety functions for the life of the facility. These regulations, however, do not consider the reduction in safety related SSCs during the decommissioning process. Removal of these SSCs from the licensing basis has been, or will be, evaluated in accordance with the applicable change process in the regulations to have no adverse public health and

safety impact prior to elimination of any records. Elimination of associated records for these SSCs can have no additional impact. Retention of records associated with SSCs that are or will no longer be part of the facility licensing basis serves no safety or regulatory purpose. Ultimately, the SSCs will be physically removed from the facility. Therefore, application of these record requirements in those circumstances does not serve the underlying purpose of the regulations.

Based on the above, the application of the subject record keeping requirements to the PNP records specified above is not required to achieve the underlying purpose of the rule. Thus, special circumstances are present which the NRC may consider, in accordance with 10 CFR 50.12(a)(2)(ii), to grant the requested exemption.

2. 10 CFR 50.12(a)(2)(iii): Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted.

The records retention requirements applied by the NRC to the construction and operation of nuclear power plants are intended to demonstrate, on a broad basis, that SSCs and activities are supportive of the safety analysis and the requirements of the NRC license for an operating reactor and operability of its safety functions. The records program requirements provide assurance that records will be captured, indexed, and stored in an environmentally suitable and retrievable condition resulting in a significant volume of records of many forms and a significant associated cost. The burden associated with the operations phase records requirements was understood and considered appropriate by the NRC and their reactor licensees. However, the effect of the operations phase record retention requirements that survived the life of a facility and no longer served an underlying safety purpose were not fully understood or considered. This is the current situation at the decommissioning facilities. The operating reactor records retention requirements to which PNP is currently regulated are no longer necessary or appropriate in that the SSCs and activities to which many of the records apply are no longer important to the facility, the public or worker health and safety.

VII. ENVIRONMENTAL ASSESSMENT

The proposed exemption meets the eligibility criterion for categorical exclusion set forth in 10 CFR Part 51, Subparagraph 22(c)(25) (51.22(c)(25)), because the proposed exemption involves: (i) no significant hazards consideration; (ii) no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (iii) no significant increase in individual or cumulative public or occupational radiation exposure; (iv) no significant construction impact; (v) no significant increase in the potential for or consequences from radiological accidents; and (vi) the requirements from which the exemption is sought involve recordkeeping requirements. Therefore, in accordance with 10 CFR 51.22(b), no environmental impact statement or environmental assessment need to be prepared in connection with the proposed exemption.

(i) No Significant Hazards Consideration Determination

Entergy Nuclear Operations, Inc. (Entergy) has evaluated the proposed exemption to determine whether or not a significant hazards consideration is involved by focusing on

the three standards set forth in 10 CFR 50.92, *Issuance of Amendment*, as discussed below:

1. Does the proposed exemption involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed exemption is administrative in nature. The proposed exemption has no effect on structures, systems, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed exemption would not increase the likelihood of the malfunction of any plant SSC.

The probability of occurrence of previously evaluated accidents is not increased, since most previously analyzed accidents will no longer be able to occur and the probability and consequences of the remaining accidents are unaffected by the proposed exemption.

Therefore, the proposed exemption does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed exemption create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed exemption does not involve a physical alteration of the plant. No new or different type of equipment will be installed and there are no physical modifications to existing equipment associated with the proposed exemption. Similarly, the proposed exemption will not physically change any SSCs involved in the mitigation of any accidents. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed exemption does not create the possibility of a new accident as a result of new failure modes associated with any equipment or personnel failures. No changes are being made to parameters within which the plant is normally operated, or in the setpoints which initiate protective or mitigative actions, and no new failure modes are being introduced.

Therefore, the proposed exemption does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed exemption involve a significant reduction in a margin of safety?

The proposed exemption does not alter the design basis or any safety limits for the plant. The proposed exemption does not impact station operation or any plant SSC that is relied upon for accident mitigation.

Therefore, the proposed exemption does not involve a significant reduction in a margin of safety.

Based on the above, Entergy concludes that the proposed exemption presents no significant hazards consideration, and, accordingly, a finding of, *no significant hazards consideration*, is justified.

- (ii) **There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.**

There are no changes in the types, characteristics, or quantities of effluents discharged to the environment associated with the proposed exemption. There are no materials or chemicals introduced into the plant that could affect the characteristics or types of effluents released offsite. In addition, the method of operation of waste processing systems will not be affected by the exemption. The proposed exemption will not result in changes to the design basis requirements of SSCs that function to limit or monitor the release of effluents. Therefore, the proposed exemption will result in no significant change to the types or significant increase in the amounts of any effluents that may be released offsite.

- (iii) **There is no significant increase in individual or cumulative public or occupational radiation exposure.**

The proposed exemption does not involve any physical alterations to the plant configuration or any changes to the operation of the facility that could lead to a significant increase in individual or cumulative occupational radiation exposure.

- (iv) **There is no significant construction impact.**

No construction activities are associated with the proposed exemption.

- (v) **There is no significant increase in the potential for or consequences from radiological accidents.**

See the no significant hazards considerations discussion in item (i)(1) above.

- (vi) **The requirements from which exemption is sought involve recordkeeping requirements.**

The requirements from which the exemption is sought involve recordkeeping requirements as defined in 10 CFR 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c).

VIII. IMPLEMENTATION

On October 19, 2017, in accordance with 10 CFR 50.82(a)(1)(i), Entergy submitted, on behalf of PNP, a notification of its intent to permanently cease operations not later than May 31, 2022 (Reference 1). If granted, the exemption would become effective after docketing the certification required by 10 CFR 50.82(a)(1)(ii), after which the implementation of the exemption is currently expected to occur in June of 2022.

IX. CONCLUSION

The information provided above gives the NRC sufficient basis for granting an exemption from the recordkeeping requirements of 10 CFR 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3),

and 10 CFR 50.71(c) for: 1) records pertaining to SSCs or activities associated with the nuclear power unit and associated support systems that are no longer required to support licensed operations at the PNP site; and 2) records pertaining to the SFP and associated support systems for the safe storage of fuel in the SFP after all the spent nuclear fuel has been transferred from the SFP to the ISFSI and the SFP is ready for demolition. This exemption does not apply to any record keeping requirements for spent fuel or storage of the spent fuel at the ISFSIs under 10 CFR 50 or the general requirements of 10 CFR 72.

Based on the considerations discussed above, the requested exemption is authorized by law, otherwise in the public interest, and consistent with the common defense and security.

Entergy requests that the NRC approve this exemption request by May 31, 2022. Entergy will use the exemption, if granted, to eliminate the applicable records associated with SSCs and activities no longer required by the PNP licensing basis.

X. REFERENCES

1. Entergy Nuclear Operations, Inc. (Entergy) letter to U. S. Nuclear Regulatory Commission (NRC), *Supplement to Certification of Permanent Cessation of Power Operations*, (ADAMS Accession No. ML17292A032), dated October 19, 2017
2. Holtec Decommissioning International letter to NRC, *Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Palisades Nuclear Plant*, (ADAMS Accession No. ML20358A075), dated December 23, 2020
3. NRC letter to Entergy, *Palisades Nuclear Plant – Holtec Proposed Post Shutdown Decommissioning Activities Report with Site-Specific Decommissioning Cost Estimate (EPID L-2020-LLM-0003)*, (ADAMS Accession No. ML21011A067), dated February 1, 2021
4. NRC letter to Zion Solutions, LLC., *Zion Nuclear Power Station, Units 1 and 2 - Exemption from Record Keeping Requirements (TAC Nos. J00400 and J00401)*, (ADAMS Accession Package No. ML111260277), dated June 23, 2011
5. NRC letter to Entergy, *Vermont Yankee Nuclear Power Station - Partial Exemptions from the Requirements of 10 CFR Part 50, Appendix B, Criterion XVII; 10 CFR 50.59(d)(3) and 10 CFR 50.71(c) (CAC No. MF5846)*, (ADAMS Accession No. ML15344A243), dated December 22, 2015
6. NRC letter to Southern California Edison Company, *San Onofre Nuclear Generating Station, Units 1, 2, and 3 - Exemption from Record Keeping Requirements (CAC Nos. L53076 and L53077)*, (ADAMS Accession No. ML15355A055), dated July 18, 2016
7. NRC letter to Dominion Energy Kewaunee, Inc., *Kewaunee Power Station – Exemption from Record Retention Requirements (CAC No. L53174)*, (ADAMS Accession No. ML17069A394) dated May 10, 2017

8. NRC letter to Exelon Nuclear, *Oyster Creek Nuclear Generating Station - Exemption from Certain Record Retention Requirements (EPID L-2018-LLE- 0006)*, (ADAMS Accession No. ML18122A306), dated June 26, 2018
9. NRC letter to Entergy, *Pilgrim Nuclear Power Station – Partial Exemption from Record Retention Requirements (EPID L-2019-LLE-0002)*, (ADAMS Accession No. ML19087A152), dated May 21, 2019
10. NRC letter to Entergy, *Indian Point Nuclear Generating Unit Nos. 2 and 3 – Partial Exemption from Record Retention Requirements (EPID L-2019-LLE-0028)*, (ADAMS Accession No, ML20236J852), dated September 28, 2020