



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

March 20, 2024

Mike Mlynarek
Site Vice President
Holtec Decommissioning
International, LLC
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT – PLANT REFERENCE SIMULATOR
INSPECTION REPORT 05000255/2024010

Dear Mike Mlynarek:

On March 13, 2024, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Palisades Nuclear Plant. The enclosed inspection report documents the inspection results, which the inspectors discussed on February 12, 2024, and March 13, 2024, with you and other members of your staff. Based on the results of this inspection, no findings or violations were identified.

On June 13, 2022, Palisades ceased permanent power operations and subsequently removed all fuel from the reactor, as detailed in the letter from Entergy to the NRC, "Certifications of Permanent Cessation of Power Operations and Permanent Removal of Fuel from the Reactor Vessel," (ADAMS Accession No. ML22164A067). Upon Palisades' transition into a decommissioning status, maintenance and modifications on the simulator stopped and specific parts of the simulator were used for other applications. On September 28, 2023, Holtec Decommissioning International, LLC (Holtec) submitted a letter to the NRC requesting exemptions from certain portions of the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.82(a)(2) to pursue the potential reauthorization of power operations at Palisades (ADAMS Accession No. ML23271A140). The NRC's initial acceptance to review Palisades' request for exemptions was documented in ADAMS at Accession No. ML23291A440 on November 3, 2023.

The Palisades Nuclear Plant simulation facility was certified as a plant-reference simulator under the Simulator Facility Certification documented in "Palisades Simulator Certification Submittal," dated June 11, 1990 (ADAMS Accession No. ML18057A261). This inspection was conducted to provide assurance that the simulation facility was restored back to its certified condition, after cessation of power operations for a period of time.

This inspection performed sections of Inspection Procedure 41502, Nuclear Power Plant Simulation Facilities. The inspectors assessed the simulation facility performance, simulation facility program adequacy and implementation, and the simulator deficiency reporting system. The inspectors examined a sample of activities performed by your staff to ensure that the Palisades Nuclear Plant simulation facility was being tested in accordance with ANSI/ANS-3.5-2009, "Nuclear Power Plant Simulators for Use in Operator Training and Examination." Additionally, the inspectors reviewed the facility licensee's established programs

and processes related to continued assurance of simulator fidelity in accordance with 10 CFR 55.46(d). The inspectors reviewed selected test procedures and programmatic procedures, reviewed simulator test records, observed activities, and interviewed personnel.

In accordance with Inspection Manual Chapter (IMC) 0613 section 17.02, the Enclosure to this report includes documentation of the scope of the inspection and the factual observations of the inspectors.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact us.

Sincerely,



Signed by Nguyen, April
on 03/20/24

April M. Nguyen, Chief
Operations Branch
Division of Operating Reactor Safety

Docket Nos. 50-255 and 72-007
License No. DPR-20

Enclosure:
Inspection Report 05000255/2024010
w/Attachment: Supplemental Information

cc: Distribution via LISTSERV®

Letter to Mike Mlynarek from April M. Nguyen dated March 20, 2024.

SUBJECT: PALISADES NUCLEAR PLANT – PLANT REFERENCE SIMULATOR
INSPECTION REPORT 05000255/2024010

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**U.S. NUCLEAR REGULATORY COMMISSION
Region III**

Docket Numbers: 50-255
72-007

License Numbers: DPR-20

Report Numbers: 05000255/2024010

Licensee: Holtec Decommissioning International, LLC

Company, Inc. Facility: Palisades Nuclear Plant

Location: Covert, MI

Inspection Dates: February 5 - 28, 2024

Inspectors: Bryan A. Bergeon, Senior Operations Engineer
Troy J. Henning, Senior Operations Engineer

Approved by: April M. Nguyen
Branch Chief
Operations Branch
Division of Operating Reactor Safety

SUMMARY OF FINDINGS

Inspection Report (IR) 05000255/2024010; 02/05/2024 through 03/13/2024; Palisades Nuclear Plant simulator inspection report.

This report covers an announced, infrequently performed inspection completed by regional inspectors.

A. NRC-Identified and Self Revealed Findings

No findings were identified.

B. Licensee-Identified Violations

No findings were identified.

REPORT DETAILS

1. 4OA5 Other Activities

1P01 Simulator Inspection (41502)

a. Inspection Scope

The inspectors partially completed Inspection Procedure (IP) 41502, Nuclear Power Plant Simulation Facilities. The inspectors examined a sample of activities performed by the facility licensee's staff to ensure that the Palisades Nuclear Plant simulation facility was being tested in accordance with the ANSI/ANS-3.5-2009 standard, "Nuclear Power Plant Simulators for Use in Operator Training and Examination." Additionally, the inspectors reviewed and assessed the facility licensee's established programs and processes related to continued assurance of simulator fidelity in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 55.46(d). The inspectors reviewed selected test procedures and programmatic procedures, reviewed simulator test records, observed activities, and interviewed personnel.

The facility licensee is committed to meet the requirements of ANSI/ANS-3.5-2009, as endorsed by Revision 4 of NRC Regulatory Guide 1.149, "Nuclear Power Plant Simulation Facilities for Use in Operator Training and License Examinations." This standard establishes the functional requirements for full scope nuclear power plant control room simulators used for operator training and examination. The ANSI/ANS-3.5 standard requirements for testing are specifically implemented in PNT-020 "Simulator Performance Testing." The facility licensee is committed to meet these requirements when utilizing the simulation facility to conduct training activities, regardless of the operational state of the nuclear power unit.

1. On-Site Simulation Facility Testing and Test Results

As detailed in the attached list of documents reviewed, the inspectors reviewed simulator test results and records for (a) three steady-state tests, (b) 11 transient tests, (c) one core performance test, (d) two post-event tests, (e) one real-time and repeatability test, and (f) seven Scenario Based Testing (SBT) tests.

In accordance with section 3.4.3.2 of the 2009 revision of the ANSI/ANS-3.5 standard, Scenario-Based Testing (SBT) is only required to be performed for (1) NRC initial license examination scenarios, (2) licensed operator requalification annual examination scenarios, and (3) scenarios used for reactivity control manipulation experience. The facility licensee could not produce the test records related to SBT associated with the most recent initial license examination (2020) or the previous licensed operator requalification annual examination (2021). The facility licensee was able to reperform the SBT for these examinations using the existing examination materials and provide those to the inspectors for review on February 27, 2024.

The inspectors also observed and reviewed the simulation facility performance during two simulator scenarios. These two scenarios were developed by the facility licensee for licensed operator requalification training. The facility licensee provided a

team of three previously licensed Senior Reactor Operator (SRO) individuals and two previously licensed Reactor Operator (RO) individuals to operate the simulation facility using the appropriate procedures for the associated events and transients as requested by the NRC inspectors.

The scope of the inspectors' review of the above items was informed by the requirements of 10 CFR 55.46(c)(1).

2. Simulation Facility Procedural Development

The inspectors reviewed a sample of the facility licensee's procedures related to the simulation facility conduct of testing, documentation of simulation facility issues requiring assessment and potential corrective actions, simulation facility modifications, and the use of the simulation facility for operator training and operator testing and evaluations. The inspectors ensured the procedures developed for the Palisades Nuclear Plant simulation facility correctly reflected ANSI/ANS-3.5-2009 requirements, where applicable, and were consistent with recognized practices as reflected in currently operating reactor plant reference simulators. The inspectors also reviewed a representative sample of the Palisades' training department procedures where there was associated involvement with the simulation facility. Finally, the inspectors reviewed the facility licensee's procedures related to maintaining examination and test integrity consistent with the requirements of 10 CFR 55.49. This review was informed by the requirement of 10 CFR 55.46(d)(4).

3. Simulation Facility Programs for Assurance of Continued Simulator Fidelity

In addition to reviewing the specified procedural requirements that define the Palisades Nuclear Plant simulation facility programs for assurance of continued simulator fidelity, the inspectors compared the degree of similarity between the simulator and the reference plant control room. The inspectors also reviewed the facility licensee's simulator deficiency reporting (DR) program, including open and closed deficiencies. Finally, the inspectors reviewed facility licensee records related to the determination of whether simulator discrepancies resulted in an impact on operator training and the determination of the impact of identified simulator discrepancies on the pass/fail criteria of associated test results.

The inspectors compared the DRs identified by the facility licensee against the simulator test records and results to assess the effectiveness of the facility licensee's program for identification and prioritization of issues, reporting, evaluation, schedule for implementing timely corrective actions, and corrective actions. The inspectors assessed whether the facility licensee was effectively identifying any simulator discrepancies that could result in negative training of operators. The inspectors verified whether the facility licensee adequately captured simulator problems and deficiencies; and that corrective actions were performed, tracked, trended, and completed in a timely fashion commensurate with the safety significance of the item. The inspector's review included confirming that the corrective actions taken did not introduce new errors into the simulation facility modeling and response (reference IP 41502 section 02.02.a.2 and 02.02.b.5).

The inspectors also evaluated documented simulator differences and recent modifications impacting the simulator and the reference plant control room (reference IP 41502 section 02.02.b.3).

The scope of the inspectors' review of the above items was informed by the requirements of 10 CFR 55.46(d).

4. Summary of IP 41502 Completion

The inspectors completed the following IP 41502 inspection requirements: 02.02.b.1.(a) through (e), 02.02.b.2, 02.02.b.3, 02.02.b.4.(a) through (d), and 02.02.b.5.

b. Observations and Findings

No findings were identified.

c. Assessment

1. On-Site Simulation Facility Testing and Test Results

(a) Steady-State Test Results

Steady state testing was reviewed for the 100%, 69%, and 47% power levels under Palisades Simulator Test Procedure, SS-01, spanning at least 50% of the operating range for which reference unit data was available. The inspectors reviewed the licensee's testing and determined that it adequately addressed the requirements of ANSI/ANS-3.5-2009 section 4.1.3.1. No discrepancies were identified.

(b) Transient Test Results

The inspectors reviewed all 11 of the licensee's transient tests obtained on the simulator compared to the design data guidance in ANSI/ANS-3.5-2009 Appendix B.3. No discrepancies were identified.

(c) Core Performance Testing Results

The facility licensee used the most recent reactor core load (cycle 28) to perform the core performance testing, which was documented in Palisades Simulator Test Procedure, DR 20-033, Cycle 28 Core Performance Test. The inspectors reviewed the licensee's testing data and determined that it adequately addressed the requirements of ANSI/ANS-3.5-2009 section 3.4.3.3. No discrepancies were identified.

(d) Post-Event Testing Results

Two post-event tests were conducted and reviewed by the inspectors, Palisades Simulator Test Procedure, DR 18-007, Simulator Limits Test, on December 18, 2023, and Palisades Simulator Test Procedure, DR 19-003, Event – Automatic Plant Trip, on January 9, 2019. The inspectors reviewed the data and determined

that both post-event tests demonstrated the capability of the simulator to adequately reproduce the events, as required in ANSI/ANS-3.5-2009 section 4.4.3.4. No discrepancies were identified.

(e) Real-Time and Repeatability Test Results

The inspectors reviewed Palisades Simulator Test Procedure, RT&R, Real Time and Repeatability Test, and the licensee's associated actions and determined that they met the requirements of ANSI/ANS-3.5-2009 section 4.1.1. No discrepancies were identified.

(f) Scenario Based Testing Results

The inspectors reviewed facility licensee procedure PNT-024, Simulator Scenario Based Testing Guideline, and determined that it met the requirements of ANSI/ANS-3.5-2009 section 3.4.3.2.

In accordance with section 3.4.3.2 of the 2009 revision of the ANSI/ANS-3.5 standard, SBT is only required to be performed for (1) NRC initial license examination scenarios, (2) licensed operator requalification annual examination scenarios, and (3) scenarios used for reactivity control manipulation experience. The facility licensee was able to provide SBT associated with item (3), scenarios used for reactivity control manipulation experience. The inspectors reviewed Palisades Simulator Test Procedures, SBT-1, Rapid Down Power; SBT-2, 15% Down Power; SBT-3, 15% Power Escalation; and SBT-4, Turbine Sync; and identified no discrepancies.

During the inspection, the facility licensee could not initially produce SBT associated with (1), NRC initial license examination scenarios, or (2) licensed operator requalification annual examination scenarios, as those records were lost upon the facility's transition from an operational status to decommissioning in June 2022. In response to questions from the NRC inspectors, the facility licensee was able to reperform the SBT for these scenarios using the approved examination documentation and provided these documents to the inspectors on February 27, 2024. The inspectors reviewed the reperformed SBT data documented under Palisades Simulator Performance Testing Documentation, LOR SES-267, LOR SES-250, and ILT NRC 2020 NRC-1, and determined that the simulator could meet the section 3.4.3.2 requirements.

10 CFR 55.46(d)(1) requires facility licensees to *conduct performance testing throughout the life of the simulation facility in a manner sufficient to ensure that paragraphs (c)(2)(ii), as applicable, and (d)(3) of this section are met. The results of performance tests must be retained for four years after the completion of each performance test or until superseded by updated test results.* The failure to retain necessary records was determined to be a minor violation of 10 CFR 55.46(d)(1), as simulator fidelity was determined to not be impacted. The facility documented this issue in CR-PAL-1821.

(g) Scenario Results

The inspectors observed the simulation facility performance during two simulator scenarios. These two scenarios were developed by the facility licensee for licensed operator requalification training. The inspectors determined the simulator adequately addressed the requirements of ANSI/ANS-3.5-2009.

2. Simulation Facility Procedural Development

The inspectors reviewed the following facility licensee's simulator testing procedures:

PNT-020, Simulator Performance Testing
PNT-021, Simulator Steady State Testing Guideline
PNT-022, Simulator Transient Testing Guideline
PNT-023, Reactor Core Testing Guideline
PNT-024, Simulator Scenario Based Testing Guideline

The procedures laid out testing methodologies and schedules for all required tests and appropriately included the necessary acceptance criteria. The inspectors determined the procedures adequately addressed the requirements of ANSI/ANS-3.5-2009. No discrepancies were identified.

3. Simulation Facility Programs for Assurance of Continued Simulator Fidelity

The inspectors reviewed the following facility licensee's simulator configuration control and maintenance procedures: PNT-018, Simulator Configuration Control, and PNT-019, Simulator Change Request Implementation.

The inspectors also reviewed a list of open and closed deficiency reports (DRs) generated by the licensee to determine the types of issues that were being identified and included. The inspectors also reviewed a sample of the records to determine the impact on operator training and the effect on the previously completed ANSI/ANS-3.5-2009 required testing. The inspectors found that the licensee had a very low threshold for submitting deficiency requests. When the deficiency could not be corrected, the staff then submitted the issue for a Training Needs Analysis.

The inspectors then reviewed the licensee's database of outstanding deficiencies to ensure that they were being tracked adequately for resolution. The licensee maintained a spreadsheet of all DRs created. The spreadsheet included the DR identification number, a brief description of the issue and a priority for issue restoration. Feedback was provided the facility licensee training staff that the spreadsheet could be improved to include information pertinent to the simulator review board (SRB), who reviews and prioritizes the DRs, to include improved deficiency descriptions, issue status updates, and the status of the training needs analysis. As it was, the inspectors found the spreadsheet an effective tool to track DRs and that the SRB was effectively evaluating simulator deficiencies.

Finally, the inspectors performed a review of the simulator control room environment to the reference plant control room to verify the simulator replicated the control room in accordance with ANSI/ANS-3.5-2009 section 3.2.1.3 and that noticeable differences were corrected or that a training needs analysis had been conducted in accordance with the criteria provided in section 4.2.1.4. The inspectors identified that the font size, font

type, and bulb color of the simulator annunciators were different than that in the reference unit control room. Additionally, the light intensity of multiple control board indications in the simulator were different than those in the reference unit control room. The simulator annunciator bulb color and control board indicator bulb intensities were tracked on the DR list, as appropriate. The facility licensee was determined to not have identified and was not tracking the simulator annunciator differences. The facility licensee documented this issue in DR 2024028.

The inspectors determined that other simulator differences were appropriately documented and assessed in accordance with ANSI/ANS-3.5-2009 section 3.2.1.3.

4. OTHER INSPECTION RESULTS

4A06 Meetings, Including Exit

Exit Meeting

On February 12, 2024, the inspectors presented the preliminary inspection results to Mike Mlynarek, Site Vice President, along with other members of your staff. On March 13, 2024, the inspectors presented the final inspection results to Mike Mlynarek, Site Vice President, and the Palisades staff. The inspectors stated that no proprietary information would be included in the inspection report.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

Mike Mlynarek, Palisades Site Vice President
Mike Schultheis, Palisades Regulatory Assurance Manager
Bill Townes, Palisades Operations Shift Manager
Scott Summer, Palisades Security Manager
Gerry Wright, Palisades Radiation Protection Manager
Jim Miksa, Palisades Regulatory Assurance Engineer
Kevin Block, Palisades Nuclear Oversight Manager
Mike Lee, Palisades Chemistry Manager
Jean Fleming, Holtec International Vice President, Licensing, Regulatory Affairs & PSA
Rich Burroni, HDI Palisades Chief Nuclear Officer
Ken Morris, Palisades Radiation Protection Supervisor
Mike Bailey, Palisades Operations Supervisor
Joe Jerz, Palisades Engineering Manager
Walt Nelson, Palisades Training Manager
Chuck Sizemore, Palisades Training Contractor
Jeremy Osborn, Palisades Training Contractor
Kami Miller, Palisades Emergency Planning Manager
Chad Burton, Palisades Finance Manger

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None

LIST OF DOCUMENTS REVIEWED

Simulator Deficiency Reports:

DR 2352, Training Building HVAC, 05/31/2023
DR 2353, UPS and Simulator Power, 05/31/2023
DR 2369, Convert simulator to LEDs, 05/31/2023
DR 2374, Turbine Control System (DEH), 05/31/2023
DR 2371, Plant Process Computer Restoration, 06/06/2023
DR 2023018, Simulator room desk top systems, equipment and displays, 12/22/2023
DR 2023012, Simulator Security system. Ability to lock simulator, isolate simulator network and clear, 12/22/2023
DR 2023013, Simulator LEDs for annunciators and control board equipment do not match reference unit, 12/22/2023
DR 2023015, Turbine Control System (DEH) computer has been removed and needs to be updated, 12/22/2023
DR 2024028, Simulator Annunciator Panel Labeling, 02/12/2024

Plant Condition Reports:

CR 12354904, Simulator I/O Failure Causes Training Delay, 05/04/2020
CR 12410062, Simulator Crash During Training, 08/19/2020
CR 12463757, Simulator During Daily Simulator Operational Readiness Test, 12/11/2020
CR 12507274, Simulator Indications not working as Expected, 03/18/2021
CR 12759039, Tagging for Simulator Dismantlement, 05/12/2022
PAL-1821, SBT Data Retention, 02/12/2024

Procedures:

PNT-018, Simulator Configuration Control, Revision 1
PNT-019, Simulator Change Request Implementation, Revision 0
PNT-020, Simulator Performance Testing, Revision 0
PNT-021, Simulator Steady State Testing Guideline, Revision 0
PNT-022, Simulator Transient Testing Guideline, Revision 0
PNT-023, Reactor Core Testing Guideline, Revision 0
PNT-024, Simulator Scenario Based Testing Guideline, Revision 0
PNT-217, Examination Security, Revision 0

Simulator ANSI/ANS-3.5-2009 Appendix B Transient Tests:

Palisades Simulator Test Procedure, T01, Manual Reactor Trip, 12/13/2023
Palisades Simulator Test Procedure, T02, Simultaneous Trip of All Feedwater Pumps, 12/13/2023
Palisades Simulator Test Procedure, T03, Simultaneous Closure of all Main Steam Isolation Valves, 12/13/2023
Palisades Simulator Test Procedure, T04, Simultaneous Trip of All Reactor Coolant Pumps, 12/21/2023
Palisades Simulator Test Procedure, T05, Manual Trip of Any Single Reactor Coolant Pump, 12/21/2023
Palisades Simulator Test Procedure, T06, Main Turbine Trip from Maximum Power Level which does not result in immediate Reactor Trip, 12/21/2023

Palisades Simulator Test Procedure, T07, Maximum Rate Power Ramp from 100% to Approximately 75% and back up to 100%, 12/21/2023
Palisades Simulator Test Procedure, T08, Maximum Size Reactor Coolant System Rupture combined with a Loss of all Offsite Power, 12/21/2023
Palisades Simulator Test Procedure, T09, Maximum Size Unisolable Main Steam Line Rupture, 12/21/2023
Palisades Simulator Test Procedure, T10, Slow Primary System Depressurization to Saturated Condition with Pressurizer Relief or Safety Valve Stuck Open, 12/21/2023
Palisades Simulator Test Procedure, T11, Maximum Design Load Rejection, 12/21/2023

Simulator ANSI/ANS-3.5-2009 Scenario Based Tests:

Palisades Simulator Test Procedure, SBT-1, Rapid Down Power, 08/22/2023
Palisades Simulator Test Procedure, SBT-2, 15% Down Power, 08/22/2023
Palisades Simulator Test Procedure, SBT-3, 15% Power Escalation, 08/22/2023
Palisades Simulator Test Procedure, SBT-4, Turbine Sync, 08/22/2023
Palisades Simulator Performance Testing Documentation, LOR SES-267, Revision 1
Palisades Simulator Performance Testing Documentation, LOR SES-250, Revision 1
Palisades Simulator Performance Testing Documentation, ILT NRC 2020 NRC-1, Revision 1

Simulator ANSI/ANS-3.5-2009 Post-Event Tests:

Palisades Simulator Test Procedure, DR 18-007 Simulator Limits Test, 12/18/2023
Palisades Simulator Test Procedure, DR 19-003, Event – Automatic Plant Trip, 01/09/2019

Simulator ANSI/ANS-3.5-2009 Steady State Tests:

Palisades Simulator Test Procedure, SS-01, Steady State Test 100% Power, 12/13/2023
Palisades Simulator Test Procedure, SS-01, Steady State Test 69% Power, 12/13/2023
Palisades Simulator Test Procedure, SS-01, Steady State Test 47% Power, 12/13/2023

Simulator ANSI/ANS-3.5-2009 Real Time and Repeatability Test:

Palisades Simulator Test Procedure, RT&R, Real-Time and Repeatability Test, 12/21/2023

Simulator ANSI/ANS-3.5-2009 Core Performance Tests:

Palisades Simulator Test Procedure, DR 20-033, Cycle 28 Core Performance Test, Cycle 28

Miscellaneous Documents:

Palisades Malfunction List, List of All ANSI/ANS-3.5 Malfunctions, 12/14/2023
EC 82400, Cycle 28 Core Reload, Revision 0
EC 84561, Reduce Letdown Normal Operating Pressure, Revision 0
EC 84218, PY-0102A, PY-0102
EC 90901, EK-0946, P-50D Seal Leakage Flow Low Alarm Set
Simulator Differences List, 10/13/2021
Simulator Discrepancy Report, 02/03/2024
Simulator Design Changes Installed Since 01/01/2020
PNT-018-TF-SRB, Simulator Review Board Minutes (01/04/2024)

LIST OF ACRONYMS

ANS	American Nuclear Society
ANSI	American National Standards Institute
CR	Condition Report
DR	Discrepancy Report
EC	Engineering Change
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
NRC	Nuclear Regulatory Commission
PWR	Pressurized Water Reactor
SBT	Scenario Based Testing
SRB	Simulator Review Board