



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 21, 2015

SECRETARY

Mr. Brian Huffine, President
Palisades Park Country Club, Inc.
79336 Ravine Way
Covert, MI 49043

Dear Mr. Huffine:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated August 4, 2015, and your email dated September 10, 2015. In your correspondence, you expressed concern about the reactor pressure vessel at Entergy's Palisades Nuclear Plant. Specifically, you requested that the NRC require the licensee, Entergy Nuclear Operations, Inc., to conduct direct testing of physical samples from the Palisades reactor. Along those lines, you further recommended that the Commission uphold the Atomic Safety and Licensing Board's recent decision to hold an evidentiary hearing regarding materials issues associated with Palisades' reactor pressure vessel.

As your letter and email indicate, a hearing request on this subject is currently pending before the NRC. In March 2015, Beyond Nuclear, Don't Waste Michigan, Michigan Safe Energy Future – Shoreline Chapter, and the Nuclear Energy Information Service (collectively, "the petitioners") sought a hearing on Entergy's license amendment request concerning whether the Palisades' reactor vessel plate and weld materials provide adequate margins of safety against fracture. The Licensing Board granted the petitioners' request for a hearing on June 18, 2015. Entergy has appealed the Board's decision to the Commission; that appeal is pending. Given the pendency of the matter before both the Commission and the Licensing Board, the Commission cannot at this time discuss or comment on any issues involved in this matter. Under NRC regulations, the Commission has an adjudicatory role in this case, and all members of the Commission must remain impartial while the case is pending.

A copy of your letter, your email, and this response will be served on all the participants in this and a related *Palisades* proceeding.

Sincerely,

A handwritten signature in dark ink, appearing to read "Annette Vietti-Cook", is written over a horizontal line.

Annette L. Vietti-Cook

PALISADES PARK COUNTRY CLUB, INC.
79336 Ravine Way
Covert, MI 49043
Brian Huffine, President
huffineb@comcast.net

August 4, 2015

Mr. Stephen G. Burns, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Palisades Nuclear Power Plant, Covert, MI
Atomic Safety and Licensing Board Panel decisions
Docket No. 50-255-LA-2; ASLBP No. 15-939-04-LA-BDO 1
June 18, 2015, and July 9, 2015

Dear Chairman Burns:

We are the nearest homeowners to the Palisades Nuclear Power Plant in Covert, Michigan. The plant's southern border is the northern border of our homeowner community of 205 homes. The name of the plant comes from the name of our community, Palisades Park Country Club (the "Park" as we call it), which has been in existence since 1905 (the name is deceiving – there is no golf course and our homes are modest). Some of our homeowners live in the Park year round and others vacation here with extended families that go back six and seven generations. We are asking the Nuclear Regulatory Commission to require the direct embrittlement testing of the Palisades Nuclear Power Plant's reactor vessel necessary to ensure that the homes we have come back to for generations will be habitable for the long-term future.

When the power plant was originally proposed, our support was sought and a promise was made that the plant would always be a "good neighbor" to us. As Anthony Vitale, Vice President of Entergy, admitted to us at a meeting of our members on August 1, 2015, they have not been good neighbors. Communication has been far from freely provided. In fact, leaks of water containing radioactive material has been released into Lake Michigan, the source of the drinking water that supplies our well system, not to mention the drinking water of millions of others. **At our annual members meeting, the membership voted unanimously that the board send a letter to you expressing our strong support for requiring that physical samples from the Palisades reactor be tested and that Entergy NOT be granted any relief or exception to such direct physical testing for embrittlement.**

In 2007, the NRC granted Entergy, the current corporate owner of Palisades, a twenty year extension of its operating permit despite deep concerns of residents and environmental groups about the safety of its badly embrittled reactor pressure vessel. Entergy has now applied for regulatory relief from nuclear safety standards regulating the reactor pressure vessel at Palisades. The conservative safety protocols adopted in

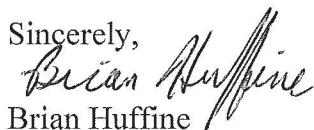
1985 under 10CFR50.61 should be maintained especially in regard to the Palisades nuclear plant. Palisades' reactor pressure vessel is acknowledged as the most embrittled in the U.S. and one of the oldest in the entire world.

Entergy's unprecedented alternative proposal would allow Palisades to avoid testing actual samples of the facility's most critical safety component, the reactor pressure vessel. Instead, Entergy would submit mathematical "interpolations" from other nuclear plants, while omitting any direct analysis of physical data taken from the Palisades reactor pressure vessel itself. We feel any alternative to physical testing of the pressure vessel at Palisades, built in 1972, does not pertain to Palisades and should not be allowed. Such indirect interpolation will endanger our safety and the safety of anyone living around Lake Michigan.

The Atomic Safety and Licensing Board Panel on June 18, 2015, found that testimony by intervening environmental petitioners demonstrated sufficient doubt as to the integrity of Palisades' pressure vessel. The Atomic Safety Board mandated a full evidentiary hearing regarding the safety of the embrittled pressure vessel at Palisades. We strongly concur with this decision and urge the NRC to uphold its ASLBP Memorandum and Order of June 18, 2015.

Margins of safety which have been built into the construction of and the regulation of nuclear power plants for many decades should not be weakened, especially in the case of critical pressure vessels at aging nuclear facilities like Palisades' pressurized water reactor. Palisades has already exceeded its original expected life of operation, forty years. Scrutiny of the Palisades reactor pressure vessel should be strengthened, not weakened, as Entergy proposes. We support the recent ASLBP decision calling for evidentiary hearings into the embrittlement of the pressure vessel and we ask for direct testing of actual samples from the Palisades reactor pressure vessel to assure public safety.

Sincerely,



Brian Huffine

President

Board of Directors

Palisades Park Country Club, Inc.

cc: Ronald M. Spritzer, Administrative Judge Ronald.spritzer@nrc.gov
PPCC Board and Members
Senator Gary Peters
Senator Debbie Stabenow
Congressman Fred Upton
Mark Muhich, Sierra Club

CHAIRMAN Resource

From: Carolyn Ferry <carolynferry@sbcglobal.net>
Sent: Tuesday, August 04, 2015 2:42 PM
To: CHAIRMAN Resource
Cc: Spritzer, Ronald; huffineb@comcast.net
Subject: [External_Sender] Palisades Nuclear Power Plant, Covert, MI
Attachments: Palisades Park Country Club letter.pdf

See attached letter from Brian Huffine, re hearing scheduled for August 7, 2015.
Re Docket No. 50-255-LA-2, ASLBP No. 15-939-04-LA-BDO1.

CHAIRMAN Resource

From: Jody Flynn <jodygflynn@gmail.com>
Sent: Thursday, September 10, 2015 8:34 AM
To: CHAIRMAN Resource
Subject: [External_Sender] Entergy Palisades Nuclear Power Plant Coupons

Follow Up Flag: Follow up
Flag Status: Flagged

From: Palisades Park Country Club, Inc.

79336 Ravine Way

Covert, Michigan 49043

To: Mr Stephen G. Burns, Chairman

U.S. Nuclear Regulatory Commission

Washington, D>C> 20555-0001

Subject: Entergy Nuclear Power Plant-Covert, Michigan

Pressurized Reactor Vessel - Embrittlement

We are writing you again in hopes you will make Entergy pull the

coupons and read the state of embrittlement of the Palisades Nuclear Power Plant. We are concerned homeowners that border that plant in Covert, Michigan. The name of the plant comes from our community, Palisades Park. We have been in existence since 1905 and currently consist of about two hundred homes. As a member of the regulating body, we are asking you to look into a very timely and critical situation concerning embrittlement testing of the Palisades Nuclear

Power Plants reactor pressure vessel. Palisades' pressure vessel is acknowledged as the most embrittled in the United States and one of the oldest in the world.

Anthony Vitale, Site Vice President at Entergy Palisades Nuclear Plant, and seven other employees of Entergy came to our members meeting in early August of this year and made a direct statement that pulling the coupons would not give Entergy more accurate information than using mathematical "interpolations". If this were true, why would Entergy be so adamantly avoiding pulling the coupons? If the concern of Entergy were to assure the vessels embrittlement state is safe, why would they not do both? We do not believe that Entergy wants to find out the level of embrittlement of this critical vessel. We are hoping the NRC will mandate the physical testing of these coupons as the Atomic Safety Board mandated in June of this year. Please help us feel safe by making them read the data from the pulled coupons. You know they have not read that data since 2003.

Entergy's Palisades Nuclear Power Plant is on the shores of Lake Michigan, one of the largest body of freshwater in North America. It is the source of drinking water for millions of Americans. Safety margins that have been built into the regulation of nuclear power plants should not be weakened, especially in the case of pressure vessels at aging facilities. Palisades has exceeded its original design life of forty years. Scrutiny of the Palisades pressure vessel should be strengthened, not diminished, as Entergy proposes.

We rely on you to help protect us from potential harm. When it comes to safety, the precautionary principal should apply. Continuing to use a potentially embrittled pressure vessel that raises threats of harm to human health and/or the environment should not be allowed. They should be made to test the coupons, which were put there specifically to gather embrittlement data.

Thank you for protecting us and using the precautionary principal to make sure we will all be safe and our environment will as well.

Palisades Park Country Club, Inc.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
ENTERGY NUCLEAR OPERATIONS, INC.)	Docket No. 50-255-LA
(Entergy))	
)	
(Palisades Nuclear Plant))	
)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO AUGUST 4, 2015 BRIAN HUFFINE LETTER** have been served upon the following persons by Electronic Information Exchange.

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Docket No. 50-255-LA

U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO AUGUST 4, 2015 BRIAN HUFFINE LETTER

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[Original signed by Brian Newell]
Office of the Secretary of the Commission

Dated at Rockville, Maryland
this 23rd day of September, 2015