

# PUBLIC SUBMISSION

<b>As of:</b> 3/10/21 10:01 AM <b>Received:</b> March 04, 2021 <b>Status:</b> Pending_Post <b>Tracking No.</b> klv-ewcd-6lfz <b>Comments Due:</b> March 08, 2021 <b>Submission Type:</b> Web
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**Docket:** NRC-2021-0036

Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

**Comment On:** NRC-2021-0036-0001

Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

**Document:** NRC-2021-0036-DRAFT-0013

Comment on FR Doc # 2021-02357

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## General Comment

As a frequent visiter and former resident of the states surrounding Lake Michigan, I make the following comments regarding the "Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments".

First and foremost, 30 days is far from enough time for the public to prepare meaningful comments on this complex license transfer application. The risks of tritium contamination on the Palisades site will persist for more than a century. The risks of cesium-137 contamination on the Palisades site will persist for several centuries. The risks of plutonium-239 contamination on the Big Rock Point site will persist for 240,000 years. The risks associated with the highly radioactive irradiated nuclear fuel stored at both sites will persist for a million years, or longer, into the future (Nuclear Energy Institute versus U.S. Environmental Protection Agency, U.S. Court of Appeals for the District of Columbia Circuit, case filed 2002, ruling issued July 9, 2004). Thus, an additional 60 days for the submission of public comments is a reasonable request, especially considering the ongoing burdens concerned citizens are facing due to the ongoing, deadly Covid-19 pandemic. Exacerbating the public's need for more time to comment is the fact that NRC has been posting many hundreds, perhaps even more than a thousand, documents in its Palisades docket, that are 25-years old, or older. These documents could well contain relevant information, such as re: past radioactive and/or toxic chemical spills on the site, contamination that must be cleaned up during the decommissioning phase. 60 additional days of public comment opportunity on the proposed license transfer will give not only the concerned public more time to analyze the newly posted documents for relevance, but will give Holtec more time to reconsider whether it really even wants to take over this contaminated site.

Additionally, I make the following technical, environmental, public health, safety, and security-related comments:

In 2006, as part of its resistance to the 20-year license extension at Palisades, a coalition of 25 local grassroots, multi-state regional, and even national groups, representing 200,000 Michigander members and supporters alone, submitted broad comments to NRC on its related Draft Environmental Impact Statement. The comments addressed a comprehensive array of concerns, including re:

- (a.) security;
- (b.) highly radioactive waste storage, handling, and disposition, including transportation (very long overdue need for Hardened On-Site Storage);
- (c.) hazardous radioactive discharges to the environment, a risk to the food chain and drinking water supply downwind and downstream;
- (d.) ever worsening global warming;
- (e.) revenues (lack thereof) for the host municipalities, like Covert Township;
- (f.) ratepayers (and/or taxpayers) left holding the bag;
- (g.) threatened, endangered, or candidate species put at risk from radioactivity and/or toxic chemical releases, whether acute due to accident, or chronic due to leakage of contamination;
- (h.) Indigenous Nations' interests, such as protection of burial sites, and other cultural properties, protection of treaty rights, etc.;
- (i.) embrittled and aged safety significant systems, structures, and components;
- (j.) emergency preparedness in surrounding communities;
- (k.) Environmental Justice;
- (l.) compliance with Canadian-U.S. International Joint Commission commitments, including Boundary Waters Treaty obligations.

None of Palisades' various owners/operators (Consumers Energy, Nuclear Management Corp., Entergy), nor NRC, have ever adequately addressed any of these concerns, if they've addressed them at all. Many,

to most, to all, remain relevant, even post-reactor shutdown, during the decommissioning phase.

Therefore, I re-submit the coalition's comments from 2006, 15 long years later, and demand that the current owner Entergy, the prospective new owner Holtec, and the supposed, derelict "safety regulator" NRC, address the coalition's concerns, and implement the coalition's recommended mitigations. If not, Holtec's proposed takeover of the Palisades site should not be approved.