

# PUBLIC SUBMISSION

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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-0011

Comment on FR Doc # 2021-02357

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## General Comment

As public comments, I have the following concerns and contentions:

- (a.) Changes in land use, effects of historical site events, and inadequacies of the 2006 (20-Year License Extension) Supplemental Environmental Impact Statement all comprise new information which necessitates additional NEPA supplementation -- specific areas of concern include: (a) historic high Lake Michigan water levels;
- (b.) radioactive steam generator storage, handling, transport, and disposition, including potential for barging on Lake Michigan and risk of accidental sinking causing drinking water disasters;
- (c.) historic cooling towers overflow, and consequent spread of radioactive contamination from the flooded RadWaste Building;
- (d.) needed characterization of historic tritium spillage, leakage, and releases across the site, and implications for Lake Michigan and inland aquifer drinking water supplies over time;
- (e.) earthquake safety regulation non-compliant dry cask storage concrete storage pads;
- (f.) discrepancies re: the estimated number of casks needed to store highly radioactive Greater-Than-Class-C "low" level radioactive wastes;
- (g.) dry cask storage repackaging dilemmas, such as due to failed or failing casks and/or canisters, transfers needed for transportability and/or compliance with repository disposal requirements, etc.;
- (h.) the defective fourth cask to be loaded in summer 1994, never unloaded in 27;
- (i.) unconsidered high burnup irradiated nuclear fuel implications;
- (j.) Holtec International and SNC-Lavalin, as well as their subsidiary corporations, individually and collectively lack the requisite corporate character, corporate culture and corporate ethics to be licensed, or allowed by contractual privity, to undertake any aspect of the decommissioning of Palisades Nuclear Plant;
- (k.) Applicants' request for the NRC to grant an exemption to use Nuclear Decommissioning Trust funds for irradiated nuclear fuel management and site restoration activities is contrary to law and regulation,

would present an undue risk to the public health and safety, and is not consistent with the common defense and security;

(l.) the Application and PSDAR are deficient under Title 10 Code of Federal Regulations, Parts 50.75(b)(1) and (e)(1)(i), because they improperly assume a 2% rate of return for the Nuclear Decommissioning Trust fund;

(m.) the Application is deficient because Holtec offers only the Decommissioning Trust Fund to support Its financial qualifications;

(n.) Holtec fails to show financial qualification to qualify for a license transfer, by failing to provide adequate decommissioning financial assurance and/or adequate funding for spent nuclear fuel management, in violation of 10 C.F.R. §§ 50.33(f) and (k)(1), 50.40(b), 50.54(bb), 50.75(b)(1) and (e)(1)(i), 50.80(b)(1)(i), 50.82(a)(8)(vii), and 72.30(b) because Holtec's PSDAR and decommissioning cost estimate underestimate license termination and spent fuel management costs;

(o.) the PSDAR impermissibly assumes Holtec will receive a regulatory exemption authorizing the use of decommissioning trust monies for site restoration and spent fuel management. Since Holtec has yet to receive such an exemption and has shown no other source of funding for site restoration and spent fuel management, it fails to satisfy NRC regulations at 10 C.F.R. §§ 50.54(bb) and 72.30(b).

(3.) Holtec's reliance on, and assumption of, its proposed irradiated nuclear fuel CISF scheme, targeting the majority minority State of New Mexico. Not only is Holtec's CISF proposal a major violation of Environmental Justice, it also violates the 2012 Blue Ribbon Commission on America's Nuclear Future Final Report's recommendation that CISFs must meet "consent-based siting." Similarly, Holtec's reliance on, and assumption of, the Yucca Mountain highly radioactive waste dump-site scheme, targeting Western Shoshone land in Nevada. The Western Shoshone, the State of Nevada, its U.S. congressional delegation, and more than a thousand environmental groups in Nevada and across the country, have clearly expressed non-consent with the environmentally unjust Yucca dump scheme, which violates the U.S.-Western Shoshone "peace and friendship" Treaty of Ruby Valley of 1863, the highest law of the land, equal in stature to the U.S. Constitution itself.