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

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General Comment

I am pleased about the closing of Palisades Nuclear Plant as I have long been concerned about it operating safely.

I am very concerned however about selling the Plant to Holtec for decommissioning as there are grave inadequacies in their plan.

The Plant sits on the shores of Lake Michigan which is the source of drinking water to 40 million people, a recreational area for many and the source of revenue, based on this tourism, for multiple towns and cities along its coast.

Holtec's plan doesn't seem to include any contingencies for dealing with geologic or weather events that have happened in the past and could happen again during the years of decommissioning. A catastrophic weather event now has a greater likelihood of happening due to climate changes. Any events like these would likely cause more radioactive contamination.

Holtec's plan for radiological clean up is woefully inadequate. They plan to use a generic impact statement to determine the condition of the site and then only clean up to a depth of 3 feet under the land. Their plan for management of irradiated nuclear fuel is likewise inadequate. The fuel will be stored in dry casks only, on site

for maybe 18 years more from the date of shutdown . There is currently a damaged cask on site, in that condition for many years without being moved to a new cask.

Dry casks do not provide enough protection. The plan to eventually, by 2040, move maybe by barge on Lake Michigan, the nuclear waste to a more permanent storage is fraught with possible consequences that could destroy

this area. A much better alternative for storage would be hardened on site storage.

These are just a handful of the problems with Holtec's decommissioning plan there are many more. We must find a way to safely decommission Palisades and in doing so save the water, the people and their

livelihoods.
Sandra McComb
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