

# PUBLIC SUBMISSION

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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

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## General Comment

As you know, Palisades Nuclear Power Plant in Covert Township, MI, is scheduled to cease operations in May, 2022, to then begin a decades-long decommissioning project. We have some requests concerning this process.

I am writing to you to ensure that the NRC License Transfer Application (LTA), is performed in accordance with federal rules and codes. In previous LTA's applied for by HOLTEC, the NRC granted them waivers and exemptions. Should this happen with the Palisades' license application, the southwest region of Michigan, and Lake Michigan itself, will be greatly endangered.

I ask of the Nuclear Regulatory Commission:

1. No exemption be granted to HOLTEC to deplete Palisades NP's Decommissioning Trust Fund (DTF). The Palisades DTF is already woefully under-resourced. Tapping into the DTF to finance maintenance of any spent nuclear fuel is prohibited by the federal code.
2. Require a Supplemental Environmental Impact Statement (SEIS) for Palisades including a current site characterization study. By federal code, any nuclear operating license transfer requires an SEIS. NRC has previously ignored this rule while accepting HOLTEC's LTA for Pilgrim NP in Massachusetts and for Indian Point NP in New York. It is important for the NRC to require HOLTEC to dedicate to the Palisades DTF any revenues pursuant to its lawsuits against the Department of Energy (DOE) for breach of "the standard contract". The DOE has failed to take possession of the spent nuclear fuel at Palisades, and at other locations, as well.

3. Demand that HOLTEC and HOLTEC Decommissioning International provide a surety bond to cover at least \$500 million for the decommissioning of Palisades NP. Without such financial guarantees, Michigan taxpayers could be paying a billion dollar bill for decades to come.

4. Hold NRC public meetings preceding any acceptance of the Palisades LTA.

5. Examine and harvest all irradiated structures and vessels associated with the operation of Palisades NP in order to determine the deterioration, if any, of the pressure vessel components. This will be important in assessing the risks posed to other aging nuclear plants that are applying for operating extensions of up to 100 years.

Palisades Nuclear Power Plant needs to be decommissioned in the safest scientific way to protect Michigan residents.

We all love Lake Michigan. There is enough highly radioactive spent fuel stored at Palisades NP to poison most of Lake Michigan for generations yet unborn.