

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE SECRETARY

In the Matter of)	
)	Docket Nos. 50-255
Entergy Nuclear Operations, Inc.)	72-007
)	50-155
Palisades Nuclear Plant and)	72-043
Big Rock Point)	

AMENDED STANDING DECLARATION OF CHARLES M. BRAND

I, Charles M. Brand, declare as follows:

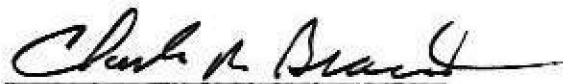
1. My name is Charles M. Brand. My permanent residence is 417 Ridge Avenue, Clarendon Hills, IL 60514. I also own a cottage at 79870 Fernwood Crescent, Covert, MI 49043, which my family and I refer to as Dunewood. I will be 67 this year.
2. My grandparents built Dunewood in 1948 and gave it to their four children in 1952. My father passed Dunewood down to me and my sisters, and we share it. I go up to the cottage about every month and spend about three months total at the cottage in the course of a year. Each sister spends two or three weeks there annually.
3. Dunewood is less than a mile from the Palisades nuclear plant. I can regularly see the steam from the cooling towers from the cottage. During years when the water is lower, I can see the plant from the beach.
4. I spend as much time on the lakefront as possible. I garden, trim trees, and do yard work on our property near the water often. I also kayak frequently, going up and down the coastline of Lake Michigan. Dunewood is about 150 feet from the waters' edge, so a lot of our activities involve the water. Weather permitting, I try to swim in the lake every day I am at Dunewood.
5. I have seven grandchildren that come and spend time at Dunewood as well. The oldest is 11-years old, and the youngest are twins who are close to a year old. They enjoy playing in the water and at the water's edge.
6. I walk up and down the beach for exercise and because the area is beautiful. Years ago, we used to swim out front of the power plant and walk past the power plant on the beach in front of it. Now we are not allowed near the facility any more.
7. One thing I would like to see is my kids and grandkids able to walk past the plant and enjoy that area of beach, so it is very important to me that the clean up of the Palisades nuclear plant is done.

8. The area around Dunewood is beautiful and has many hiking trails nearby. The association that Dunewood is a part of owns many acres of property and created the marked trails. There is a creek that comes through the property that association members have access to. There are 44 cottages on the lakefront, which is about 3000 linear feet along the water. Then there is about 1000 linear feet across the lakefront that are association-owned. A portion of the association-owned property is immediately adjacent to the plant. I remember that two or three cottages were torn down when the power plant acquired the property.
9. The community association has discussed buying some of the property back after the plant is shut down so that the community can increase the amount of property available for community purposes. The goal of the association is to protect and preserve the land to keep it as natural as possible and to provide recreation trails. Portions of the community-owned property are immediately adjacent to the nuclear plant. I worry that if the cleanup is not adequately funded, the land adjacent to the nuclear plant would not be safe for people to use.
10. One of the things I hope is that after decommissioning, those restrictions around the Palisades facility would go away so that I or my grandchildren can enjoy the land around there. They enjoy hiking around on the association trails with the family.
11. I understand that Entergy Nuclear Operations, Inc. and its subsidiaries have applied to the U.S. Nuclear Regulatory Commission for a license amendment that would allow it to transfer the operating licenses for the Palisades nuclear reactor and the Big Rock Point facility to Holtec Decommissioning International, LLC ("HDI"), a subsidiary of Holtec International ("Holtec"). It is also my understanding that after the license transfer, HDI's principal activity will be to decommission the Palisades and Big Rock Point sites. I also understand that HDI will be responsible for storage of spent reactor fuel at the site.
12. My understanding is that the only funding Holtec has for the cleanup is what is already in the trust funds. It is also my understanding that Holtec has asked to use some of the money that is earmarked for cleaning up radioactive material to pay for spent fuel storage or site restoration. I am very worried that this will result in Holtec not having enough money to clean up the radioactive materials on the site, which I believe is very important.
13. I am concerned that during decommissioning that HDI takes every precaution not to expose the community to nuclear waste. I'm worried that they will not properly dispose of the waste, which could result in radioactive waste being released from the site. Our property could suddenly become worthless and unusable.
14. I don't have any experience with Holtec, but I have read some information in the press that they have some legal issues.
15. The amount of money set aside for radiological decommissioning does impact how I feel about the permit transfer, and how I will be able to use and enjoy Dunewood and the surrounding property if the permit is transferred. I worry that the decommissioning group will cut corners and the amount of money set aside will not be enough. I worry about

whether Holtec will be allowed to take money out of the radiological decommissioning funds; doing a good job with radiological materials is really important. I do not think it makes sense for HDI to use the decommissioning trust fund for site restoration and other non-radiological decommissioning costs.

16. If the site were restored properly, my family and I would walk or boat down to the former Palisades site just as we did when I was a child. I can remember climbing around the Palisades site before it was operational. I would be less likely to have my grandchildren go hiking close to the facility if I believed that decommissioning was not proceeding safely.
17. Once decommissioning is done, my family and I would walk or boat down toward where the plant is currently, just as I did as a child. We used to enjoy playing in that area. I look forward to using that area again if decommissioning is done properly. If there is not enough money set aside for Holtec to properly decommission the plant, I would not feel comfortable walking or swimming near the plant.
18. I am a member of the Environmental Law & Policy Center and was a member when my original declaration was filed.
19. Accordingly, I have authorized the Environmental Law & Policy Center to represent me in this license transfer in order to seek conditions on the license transfer that will ensure full transparency and accountability by HDI.
20. I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 26, 2021

A handwritten signature in black ink, appearing to read "Charles M. Brand", written over a horizontal line.

Charles M. Brand