

Nuclear Regulatory Commission

Palisades Nuclear Plant License Transfer Application

NRC-2021-0036

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Re: Oppose Applicant HOLTEC et al Motion to Strike Don't Waste Michigan, Michigan Safe Energy Future and Beyond Nuclear Contentions in Palisades Nuclear Plant License Transfer Application.

As presented in my original plea to intervene in the LTA of Palisades NP's NRC operating license NRC-2021-0036-0001 a Supplemental Environmental Impact Statement should be required before any decision to transfer Palisades NP's operating license from ENERGY to HOLTEC, or before any decommissioning of the plant begins.

Ample justification for requiring a SEIS is found in NEPA 42 USC 4332(c), Section 189 (c) Atomic Energy Act, and 10 CFR 51. A generic EIS would not satisfy the purpose of these federal regulations, which is to protect the public's safety.

Asserted in my original submission is the inadequate planning for disposition of the Spent Nuclear Fuel at Palisades NP in ENTERGY HOLTEC's LTA. Applicants have no plans to deal with the SNF other than to transport it to an unlicensed consolidated interim storage facility, Applicants have not considered the real possibility that the SNF, ~4,000 Tons, may remain on site for decades or even a century. Applicants have not considered the possibility that some casks currently storing the SNF at Palisades NP may need to be replaced within forty years. And applicants have not factored in their LTA prospects for increased water levels in and increasingly violent storms in and on Lake Michigan due to climate change.

At present, applicants have presented no data on the radiological and non-radiological contamination at Palisades NP. Undetected contamination at Pilgrim and Vermont Yankee Nuclear Plants increased the decommissioning costs there by hundreds of millions of dollars.

These are significant questions material and germane to the Palisades LTA. These questions cannot be answered adequately by a generic EIS. Their significance to the public's safety is not diminished by the applicants' neglect of them in their LTA, but only increased. We interveners should not be delimited by the omissions of the applicants' LTA in our mission to protect the public's safety while assuring the complete decommissioning and site restoration of Palisades NP.

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