

Palisades Conversion Group

Concerns and comments, for Environmental Scoping Meeting

April 5th 2006

1. Having worked in two Occupations, within the Nuclear field, *Laborer, J.A. Jones Construction Co. 1971-72 on the Donald C Cook Nuclear Power Plant*, then at *Palisades Nuclear Power Plant, Decon-Tech for Essential Services Co.* during an Refueling Outage, in the early 90s, I have seen construction of, then finished Plants, during tours. The Plants then new and impressive. Then again, many years later, aging, much obsolete, often highly contaminated equipment; mal-functioning devices such as the Reactor Containment, Hatch-door, in-operable for some time, while I was de-coning when *Consumers Energy*, Operated this Plant. Things get old, dilapidated with time, especially when they are neglected. Worn-out. Under the influence of radiation. Out-dated. Or used-up, such as the Palisades Plants Fuel-pool, now double-racked. Steam Generators replaced, highly contaminated previous units, within they're own mortuary on the Plant Site. Along with, approximately 30, V.S.C. 24 and (34) Dry Storage Casks, in use for Above Ground Spent-fuel Assembly storage, also on site. An Cut-rate, move Consumers Energy Co. took when their Fuel-pool was filled to maximum capacity. Well-passed, it's original design capacity; threatening a Shut-down of the Plant. Breaking another promise, made when the Plant was first built, "That no, Highly contaminated radioactive materials would be on the plant-site, out-side it's high-level Containment structure. For purposes other than re-fueling and eventual removal of spent-fuel assemblies. To a National Depository."
2. After 38 years of Operation, *Palisades Nuclear Power Plant* and it's *Reservation*, is showing it's age. Effects of Embrittlement, it's Pressure Reactor Vessel being protected with old, many cycled fuel assemblies, a case in point. Years now. No vessel replacement, or further shielding in sight. Or 2007 says the NRC, 2011, say others; 2014, says Palisades Lawyers! Should have been replaced ten years ago. As P.R. Spokesperson, Mark Savage told the Local Press back 1993, when the problem surfaced, during an interview with the South Haven Daily Tribune. Once they finally got him to admit, there was a metal condition called "Embrittlement," effecting the reactor!

One of the biggest complaints, from Plant Critics, is the Operators have been less, than forth-coming when problems surface. Make excuses, rosy predictions they know, well never come to pass. Or lie to anyone listening, when the information might, or well be, perceived as contentious. Placing Public trust, in jeopardy.

Much the same thing, can be said, of the NRC, during these current round of Scoping Meetings, concerning this Relicensing endeavor. Long time followers of this issue, has seen and heard from a very different NRC, under past Presidential Administrations; the difference between now, and say, the early 90s, can not be denied. This is a very, Business Friendly, NRC. Not Public or Environmentally friendly.

2. Yesterday I received my copy of *Generic Environmental Impact Statement for License Renewal of Nuclear Plants Supplement 27: Regarding Palisades Nuclear Power Plant* Feb. 2006

Reading through, both the Manual and it's cover-letters, I see, despite the potential, Radioactive hazards, the *NRC* insists the *Environmental Impacts*, of Palisades Nuclear Power Plant and all the radioactive materials about it's Reservation, is always regarded as "SMALL"! throughout this Report. But, when I turn to the Alternative Energy sources, which should be pursued at the Palisades Plant site, there impacts are often referred to as "LARGE"! Which all considering, they would be, taking into account the enormity, of the electrical power the plant puts on the grid, for Alternatives to equal out. In they're current forms, at the site.

A rather particular assumption. Bracketing both the Plant's and *NRC* positions well, yet ignoring the simple fact, that if all the resources used to continue operation of this plant, were put into Renewables and others forms or electrical generation throughout the State, it would turn the argument on its head.

What my real concern here, is the fact this *GEIS Report* does not, take into it's consideration of the Dry-cask Storage, other highly radioactive, contaminated things such as the former Steam Generators on site. Many would argue the Palisades Reservation is all ready, a defacto High-level, Nuclear-Waste Dump! Which to their, *PCC (Palisades Conversion Group)* and my way of viewing this issue, a "LARGE" impact, on this fragile, Lake Shore Environment. More to the point, Potential Impact, should things, not, go as designed or planned. Or Promised! Which over the last 38 years, time and time again, have been broken.

With an additional, twenty years, worth of Above-ground, Dry Storage Casks, along with other contaminated equipment, which is sure to be replaced should this plant be pushed so far past is original, design capacity. Which it all ready has, by years, now. Counter to the *GEIS's* insistence that no changes to the plant, need take place, in the additional twenty years.

Isn't the reactor-head, soon to be replaced? In July, perhaps?

The Pressure reactor vessel, long in question, operated in a patch-work method since Embrittlement, was discovered, more than ten years ago. How long, before it is replaced?. Annulated as once promised in Court, or an Neutron-thermal shield installed? Replaced!?

And yes, the Dry-storage Casks piling up on Site. I'm sure we'll hear all about Yucca Mountain, or the Goshutes, Skull Valley Indian Reservation, taking all this off our hands, for the umpteenth time, in the last twenty years. Now there are over 20 to 30 Dry-storage Casks on site. Well anyone here, give us the exact number?! Or are you going to just clodge the question again? Insisting it's a Federal issue, none of this Relicensing business concern.

This is, a Local Community concern, for we, well have to live with, and care-take all of this waste for Generations to come! In 93, we were told these experimental, Cut-rate, Dry-storage casks, would be gone in 1998, time and time again by Mark Savage, the Plant Spokesman.

Now, we are told by the *NRC*, they're licensed to store fuel assemblies for twenty years; well last for 150 years; and *Above Ground Storage* is our Nations Nuclear future! Since the Feds haven't found a hole, deep or dry enough, to put all this radioactive waste and materials in! After nearly fifty years of looking, constructing, spending and charging us Rate-Payers, for a place to take it off our shorelines. Nothing, but this. Another promise broken. More public trust, going by the wayside.

(On April 4th, the Skull Valley Reservation will be approved for Above Ground Storage; but, what with Yucca Mountain inability to take the slated casks off the Goshutes hands, there WELL NOT, be room in either Nuclear-waste Storage-site, for the all waste piling-up at Palisades now; much-less then all the additional waste, produced during the 20 Relicensing period! All, for a little, electricity now, decades, perhaps centuries of Radioactive waste, for the local citizenry to look after. Yet the Operators still insist, this is a cheap form of power-generation!?)

4. Another concern, is the Plants original 7-mile Cooling -Loop, rumored to be back in use again; it's effect of Lake Michigan's Eco-system. Is it, or is it not, back in use?

When I questioned the new Palisades P.R. Spokesperson, she wasn't even aware, of this Cooling-Loop!?

Or so she. informed me. She was fairly new to the job, but this loop has been out in the lake since the plants inception. I know Mr. Bradley, one of the Under-Waters Welders who built it, back in the late 60s. I remember the Environmentally driven, Court actions, making Consumers Power Co. construct Cooling Towers, to bypass this system because of the Loops adverse impact on the Lakes wildlife and Endangered-species; therefore the Court's shutting this underwater Cooling loop down. I thought, for good, since Cooling Towers had to be constructed to operate the plant. Again, is this Cooling-loop back in use? What are the new, Eco-system Impacts on the Lake, taken into consideration by the Plant Operators and NRC, if it is?

What is the current status of this Loop, now?

No mention of the Sail Darter, in this new GEIS Manual. Is the Snail Darter now extinct, recovered, or still within the Plants immediate shoreline area? If-so, how is it doing, should this Cooling Loop, be back in use. Or is the Plants huge, lake water, intake and discharge, effecting it?

(I need to call Dept of Wildlife? The DNR?) (I called up the Dept of Fish and Wildlife, in Lansing, spoke to Todd, who was interested, yet explained that the Snail-darter is an Endangered species, who lives in three South Eastren States. Not, listed as ever having lived within Lake Michigan!? To his knowledge, but this Court-suit goes back to the late 60s. It seems the Snail Darter must have moved on, wiped out of the Great Lakes so long ago, this issue is no longer prevalent to the current Cooling-loop problems.

5. Questions about Palisades, Fuel-pool crane breakdown, the Oct.11th. 55 hour shutdown, with an 110 ton. Dry-storage cask, containing spent fuel-assemblies, hung "partially suspended" in the air, held partly submerged over the fuel-pool. The Fuel-pool racked well beyond, it's original design capacity with fuel-assemblies going back to the 70-s.. I have gathered from the Tribune article, all the brakes froze, because Plant-personal did not set the emergence brake properly, just before leaving for his vacation!

How big, a rem-stream, would this situation would be giving off? How many rems, the article certainly didn't say. Did the whole fuel-pool area, must have had to been decontaminated; how much did it receive?

All that spent-fuel at risk, should that Cask had dropped down onto decades worth of spent-fuel assemblies, in would could have caused a fire, making for a accident much worse, than Chernobyl!

The article also pointed out, this incident was considered, of Low, Safety significance, by the NRC, within it's Quarterly Report. Quite a change, from the NRC in the Early 90s, when Dry-Cask Storage, was first initiated at Palisades; giving the Operators 30 violations, for everything from crack pipes to, mishandled, dropped fuel-assembly rods, into its reactor vessel..

Did they ever find that two pounds of missing fuel?

To *Palisades Conversion Group*, this incident further demonstrates the Aged, long-time ineffectiveness of both the equipment and Personal, at the Palisades plant; right along with the Current *NRC*, not handing out *Violations*, for such screw-ups. This must have been, some long term radiation, being released for over two days within the Fuel-pool area? We're procedures fumbled? Could not get their crane to budge, for days!?

Because one brake froze, then all it's breaks shutdown. For 55, hours!?! What were the Plant Personal doing, scratching their heads?!

A further explanation, of "partially suspended" 110 lb. Metal inner cask, leaves me with cause for concern, as it did others, was not made clear in the article. Just insistences that everything was "Okay". Just what is, the shielding, of the bare metal cask? Lead, Neutron-thermal shielding? Was there Helium within the cask, at the time? The *Public* would like to know?

Just keeping this incident under wraps, while say, the Three Judge Panel Hearing was taking place, demonstrates both the Plant, and the NRC's inability, to be less than forthcoming with the local Public when things go wrong at Palisades.

And please, stop saying, this is a Federal issue, no concern to any of us Locals here. Or this Re licensing process. Anther twenty-five years, of manufactured waste, and waste handling, storage, is what we are going to have to live with, so it's our concern. On questionable storage pads, cut-rate casks, piling up out of a plant long past it original Decommissioning Date.

By the way. Tell us this. What was, this Plants original Decommissioning date, when first built and began operations, in 71?

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