

**PALISADES PARK COUNTRY CLUB, INC.**  
**79336 Ravine Way**  
**Covert, MI 49043**  
**Brian Huffine, President**  
**huffineb@comcast.net**

August 4, 2015

Mr. Stephen G. Burns, Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Re: Palisades Nuclear Power Plant, Covert, MI  
Atomic Safety and Licensing Board Panel decisions  
Docket No. 50-255-LA-2; ASLBP No. 15-939-04-LA-BDO 1  
June 18, 2015, and July 9, 2015

Dear Chairman Burns:

We are the nearest homeowners to the Palisades Nuclear Power Plant in Covert, Michigan. The plant's southern border is the northern border of our homeowner community of 205 homes. The name of the plant comes from the name of our community, Palisades Park Country Club (the "Park" as we call it), which has been in existence since 1905 (the name is deceiving – there is no golf course and our homes are modest). Some of our homeowners live in the Park year round and others vacation here with extended families that go back six and seven generations. We are asking the Nuclear Regulatory Commission to require the direct embrittlement testing of the Palisades Nuclear Power Plant's reactor vessel necessary to ensure that the homes we have come back to for generations will be habitable for the long-term future.

When the power plant was originally proposed, our support was sought and a promise was made that the plant would always be a "good neighbor" to us. As Anthony Vitale, Vice President of Entergy, admitted to us at a meeting of our members on August 1, 2015, they have not been good neighbors. Communication has been far from freely provided. In fact, leaks of water containing radioactive material has been released into Lake Michigan, the source of the drinking water that supplies our well system, not to mention the drinking water of millions of others. **At our annual members meeting, the membership voted unanimously that the board send a letter to you expressing our strong support for requiring that physical samples from the Palisades reactor be tested and that Entergy NOT be granted any relief or exception to such direct physical testing for embrittlement.**

In 2007, the NRC granted Entergy, the current corporate owner of Palisades, a twenty year extension of its operating permit despite deep concerns of residents and environmental groups about the safety of its badly embrittled reactor pressure vessel. Entergy has now applied for regulatory relief from nuclear safety standards regulating the reactor pressure vessel at Palisades. The conservative safety protocols adopted in

August 4, 2015  
Mr. Stephen G. Burns  
Page 2

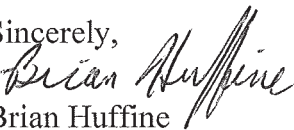
1985 under 10CFR50.61 should be maintained especially in regard to the Palisades nuclear plant. Palisades' reactor pressure vessel is acknowledged as the most embrittled in the U.S. and one of the oldest in the entire world.

Entergy's unprecedented alternative proposal would allow Palisades to avoid testing actual samples of the facility's most critical safety component, the reactor pressure vessel. Instead, Entergy would submit mathematical "interpolations" from other nuclear plants, while omitting any direct analysis of physical data taken from the Palisades reactor pressure vessel itself. We feel any alternative to physical testing of the pressure vessel at Palisades, built in 1972, does not pertain to Palisades and should not be allowed. Such indirect interpolation will endanger our safety and the safety of anyone living around Lake Michigan.

The Atomic Safety and Licensing Board Panel on June 18, 2015, found that testimony by intervening environmental petitioners demonstrated sufficient doubt as to the integrity of Palisades' pressure vessel. The Atomic Safety Board mandated a full evidentiary hearing regarding the safety of the embrittled pressure vessel at Palisades. We strongly concur with this decision and urge the NRC to uphold its ASLBP Memorandum and Order of June 18, 2015.

Margins of safety which have been built into the construction of and the regulation of nuclear power plants for many decades should not be weakened, especially in the case of critical pressure vessels at aging nuclear facilities like Palisades' pressurized water reactor. Palisades has already exceeded its original expected life of operation, forty years. Scrutiny of the Palisades reactor pressure vessel should be strengthened, not weakened, as Entergy proposes. We support the recent ASLBP decision calling for evidentiary hearings into the embrittlement of the pressure vessel and we ask for direct testing of actual samples from the Palisades reactor pressure vessel to assure public safety.

Sincerely,



Brian Huffine

President

Board of Directors

Palisades Park Country Club, Inc.

cc: Ronald M. Spritzer, Administrative Judge [Ronald.spritzer@nrc.gov](mailto:Ronald.spritzer@nrc.gov)  
PPCC Board and Members  
Senator Gary Peters  
Senator Debbie Stabenow  
Congressman Fred Upton  
Mark Muhich, Sierra Club

## **CHAIRMAN Resource**

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**From:** Carolyn Ferry <carolynferry@sbcglobal.net>  
**Sent:** Tuesday, August 04, 2015 2:42 PM  
**To:** CHAIRMAN Resource  
**Cc:** Spritzer, Ronald; huffineb@comcast.net  
**Subject:** [External\_Sender] Palisades Nuclear Power Plant, Covert, MI  
**Attachments:** Palisades Park Country Club letter.pdf

See attached letter from Brian Huffine, re hearing scheduled for August 7, 2015.  
Re Docket No. 50-255-LA-2, ASLBP No. 15-939-04-LA-BDO1.