



OFFICE OF THE MAYOR
241 W. South Street
Kalamazoo, MI 49007-4796
Phone: (269) 337-8046
Fax: (269) 337-8182
www.kalamazoocity.org

November 6, 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-BDOI
June 18, 2015, and July 9, 2015

Dear Chairman Burns:

It is with pride that I serve as the Mayor of the City of Kalamazoo, which hosts the nationally recognized *Kalamazoo Promise* college scholarship. We celebrate three higher learning institutions, two nationally renowned healthcare systems, diverse and affordable housing, and many parks, lakes, and golf courses. Our City has a vibrant artistic community that offers the wide variety of cultural attractions that you might only expect to find in a large metropolitan area. It is a special place we call home.

Kalamazoo is also positioned within forty miles of the Palisades nuclear power plant in Covert, Michigan. In 2007, the Nuclear Regulatory Commission (NRC) granted ENTERGY, the corporate owner of Palisades, a twenty year extension of its operating permit; despite deep concerns of local and regional citizens and environmental groups about the safety of its "embrittled" reactor pressure vessel (RPV).

It is of concern that ENTERGY has submitted for "regulatory relief" from nuclear safety standards regulating the reactor pressure vessel at Palisades. The conservative safety protocols adopted in 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 circumvent testing actual samples of the facility's most critical safety component, the reactor pressure vessel. As proposed, 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. Omitting actual testing of physical data from the Palisades plant compromises the integrity of any analysis.

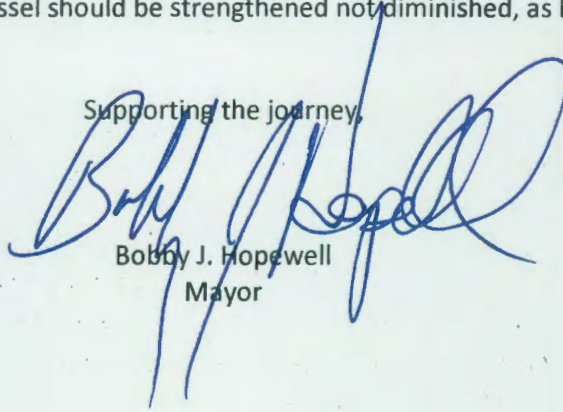
Direct embrittlement testing of the Palisades Nuclear Power Plants reactor pressure vessel provides actual data. No coupon has been pulled from the Palisades plant that holds this critical data since 2003. From the information presented the coupons should be pulled and pressure vessel tested as the Atomic Safety Board has mandated, the requested and regulatory relief should be denied to ENTERGY.

Without questioning the merits of NRC 's more recent embrittlement protocols (10CFR60.61a), it is my belief that any alternative to physical testing of the pressure vessel at Palisades, built in 1972, should not be allowed.

The Atomic Safety and Licensing Board Panel on June 18, 2015 found that testimony documented 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 or the embrittled pressure vessel at Palisades. As Mayor of Kalamazoo, I strongly concur with this decision and urge the NRC to uphold the ASLBP Memorandum and Order of June 18, 2015. The Palisades Plant is located on the shores of Lake Michigan, which is part of the largest freshwater system in North America, and the source of drinking water for millions of Great Lake residents.

The safety net which has been built into the construction of and the regulation of nuclear power plants should not be weakened, especially in the case of critical pressure vessels at aging nuclear facilities like Palisades. Palisades has already exceeded its original expected life of operation, forty years. Scrutiny of the Palisades reactor pressure vessel should be strengthened not diminished, as ENTERGY proposes.

Supporting the journey.

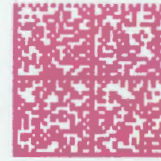



Bobby J. Hopewell
Mayor



Office of the Mayor
241 W. South Street
Kalamazoo, MI 49007-4796

PRESORTED
FIRST CLASS



UNITED STATES POSTAGE

PITNEY BOWES
02 1M
0004250486
NOV 12 2015
MAILED FROM ZIP CODE 49007
\$ 00.43⁹

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

1AJ2PMB 20555

