

**From:** Kraig D Schultz <kraig@schultzengineering.us>  
**Sent:** Wednesday, January 6, 2021 9:55 AM  
**To:** Venkataraman, Booma; Wall, Scott  
**Cc:** Kraig Schultz; Bette Pierman; Bette P; B. Iris Potter;  
bruce5050@comcast.net; Maynard Kaufman  
**Subject:** [External\_Sender] Re: Palisades Request for Relief RR 5-8

**Follow Up Flag:** Follow up  
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Hello Booma and Scott,

I am following up on the e-mail that I sent to you on September 28, 2020.

Please answer the following questions related to Palisades reactor pressure vessel:

1. Was Palisades relief request RR 5-8 approved by the NRC?
2. If RR 5-8 was approved, what are the requirements for Palisades to redo the repair should Palisades make a decision to continue operations past March 2022?
3. Was the surface stress relief process skipped or was it completed during the September 2020 refueling outage?
4. If the surface stress relief process was skipped, should the NRC take actions to require Palisades and/or the nuclear industry to do an evaluation of the weld repairs completed in September 2020 to learn if the repairs lasted as were predicted? This learning may provide critical information about how to proceed with repairs being considered for other reactor vessels.
5. What is the status of the coupons in the Palisades Reactor Pressure vessel? Aren't we past due to have some of those coupons tested for embrittlement? If we are not past due for the testing, what deviations were given to allow the testing dates to be changed?
6. What procedures are being put in place to ensure that the coupons in Reactor Pressure Vessel are not lost if Palisades does begin decommissioning in 2022? We believe it is critical that those coupons are tested to verify the mathematical models we are relying on related to embrittlement. To ensure adequate safety, we must do testing to verify our assumptions about embrittlement are correct. To not test these coupons in a timely manner could constitute criminal negligence.

Thank you,  
Kraig Schultz  
Michigan Safe Energy Future  
616-540-7027

On Mon, Sep 28, 2020 at 8:07 AM Kraig D Schultz <[kraig@schultzengineering.us](mailto:kraig@schultzengineering.us)> wrote:

To the NRC,

The Palisades nuclear power plant is about to enter its 50th year of operation. This milestone is amazing given its reputation for having one of the most embrittled reactor pressure vessels in the world. That two new cracks have developed in the lid of the vessel since 2018 should give us yet another warning that we are in a dangerous phase of operation for this plant, the age degraded phase. Given the brittleness of the vessel, we are potentially just one rapid emergency shutdown from it bursting and resulting in a Fukushima-like event in Michigan.

On Monday, September 21, 2020, Palisades Nuclear Power plant operators announced that they are planning to skip important steps in repairing the cracks that have developed since 2018. Palisades operators are asking the NRC to give it permission to skip these steps. Furthermore, the Palisades operators gave the NRC a short deadline to approve the lower quality repairs with the attitude that the NRC is expected to approve this behavior.

This is NOT the role we expect the NRC to play. The NRC's job is to regulate the nuclear industry and ensure that a culture of safety is maintained. The NRC should not allow Palisades operators to bully it or force the approval of lower quality repair procedures. The NRC has the authority, the resources and the responsibility to send strong messages to the nuclear industry that now is NOT the time to relax regulations, now is the time to be EXTRA vigilant. With an average age of about 38 years old, the U.S. commercial nuclear fleet is in the phase of its lifecycle where we must be taking extra diligence to combat age related degradation.

Catastrophic failure events often do not happen in isolation. They can result from cascading failures of seemingly tiny things that snowball into major events. We have enough problems going on in 2020 to worry about. Having our nuclear plant operators deciding to do non-regulation repairs when they see fit for the sake of financial profit is unacceptable.

We rely on the NRC to safeguard our community by enforcing NRC regulations. We support strong action by the NRC to enforce regulations that ensure our nuclear fleet operates safely until each plant reaches the end of its service.

Specifically, pertaining to [ML20267A386](#)

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML20267A386>

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Document Title:	Palisades Nuclear Plant, Relief Request Number RR 5-8, Proposed Alternative to ASME Section XI Code Requirements for Repair of Reactor Pressure Vessel Head Penetrations.
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On September 21, 2020, two methods were discussed for repairing the current cracks in the Palisades Reactor Pressure Vessel Head. One is calculated to last 1.8 years (21.8 Months) and the other to last for 27 years. Palisades is requesting to use the 1.8

year repair because they claim they will cease operations 1.7 years from now (on or before May 31, 2022).

The NRC has licensed Palisades to operate until 2031 (11 more years). A 1.8 year repair does not take the plant to the end of its license period and therefore should be rejected.

Entergy Corporation, the owners of Palisades Power plant, have a long history of trading risk to the community for corporate profit. The entire reactor lid was supposed to be replaced as part of the purchase from Consumers Energy in 2007. Prior to 2018, the Entergy corporation fooled our community and the NRC by stating it was going to shut down in October 2018. They later changed the shut down date to 2022. With this tactic, they traded public safety for corporate profit when proposing relief requests to the NRC based on shifting shut down dates.

If the operators of Palisades cannot afford to repair the cracks in the lid of the reactor vessel per regulations, then perhaps the NRC should revoke its license to operate immediately?

Therefore, we stand in support of NRC actions to reject the Palisades relief request RR 5-8 and require that Palisades operators do repairs per regulations until the end of its license.

Alternatively, if the NRC should decide to allow a lower quality repair, it should amend Palisades license to expire on the proposed May 31, 2022 date.

Finally, let's proceed to the final shutdown with an attitude of humility and cautious respect for the most powerful force in the universe, the force that binds our atoms together. Instead of doing just barely enough to make it to shutdown, let's ratchet up our focus and excellence so that we complete our operations safely and without incident.

Sincerely,

On Behalf of Michigan Safe Energy Future

Kraig D. Schultz

**Hearing Identifier:** NRR\_DRMA  
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