

From: [Laura Watchempino](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0036-0001
Date: Tuesday, March 09, 2021 1:48:47 AM

NRC Secretary, Hearing Docket Officials, and Rulemakings and Adjudications Staff:

I stand in solidarity with the Attorney General for the State of Michigan challenging Holtec's failure to show financial qualification for a license transfer through adequate decommissioning financial assurance or adequate funding for spent nuclear fuel management, as required by 10CFR Sections 50.33(f) and (k)(1), 50.40(b), 50.54(bb), 50.75(b)(1) and (e)(1)(i), 50.80(b)(1)(i), 50.82(a)(8)(vii) and 72.30(b) because Holtec has underestimated license termination and spent fuel management costs for Palisades Nuclear Plant and Big Rock Point.

I further support the following hearing contentions raised by Environmental Law and Policy Center, Beyond Nuclear, Don't Waste Michigan and Michigan Safe Energy Future:

- (a.) Changes in land use, historical site events, and inadequacies in the 2006 (20-Year License Extension) Supplemental Environmental Impact Statement all comprise new information which require National Environmental Policy Act (NEPA) supplementation -- specific areas of concern include: historic high Lake Michigan water levels;
- (b.) radioactive steam generator storage, handling, transport, and disposition, including potential for barging on Lake Michigan pose a risk of accidental sinking and drinking water disasters;
- (c.) overflow from historic cooling towers could release radioactive contamination from the flooded RadWaste Building;
- (d.) characterization of historic tritium spillage, leakage, and releases across the site is needed ;
- (e.) non-compliant dry cask storage concrete storage pads do not meet earthquake safety regulations;
- (f.) discrepancies in the estimated number of casks needed to store highly radioactive Greater-Than-Class-C "low" level radioactive wastes, such as radioactively activated reactor pressure vessel internals;
- (g.) dry cask storage repackaging dilemmas (current lack of cask-to-cask transfer capability, to be exacerbated once the wet indoor storage pool is dismantled during decommissioning);
- (h.) a defective fourth cask that was never loaded in summer 1994, despite the Palisades owner's pledge, under oath in federal court, that problem casks would be unloaded and replaced;
- (i.) high burnup irradiated nuclear fuel implications (more radioactive, thermally hotter, more brittle);
- (j.) Holtec International and SNC-Lavalin, as well as their subsidiary corporations, Holtec Decommissioning International, LLC ("HDI") and Comprehensive Decommissioning International, LLC ("CDI") individually and collectively lack the requisite corporate character, corporate culture and corporate ethics to be licensed, or allowed by contractual privity, to undertake any aspect of the decommissioning of Palisades Nuclear Plant or the management, transportation and disposal of highly radioactive irradiated nuclear fuel from Palisades and Big Rock Point (see "[Holtec & SNC-Lavalin Company Profiles](#)," by Nancy Vann, Safe Energy Rights Group; see also [Holtec](#) and [SNC-Lavalin](#) "Radioactive Skeletons in the Closet" annotated bibliographies by Beyond Nuclear);
- (k.) Holtec's request to the NRC for an exemption authorizing the use of decommissioning

trust funds for site restoration and spent fuel management is contrary to law and would present an undue risk to the public health and safety;

Finally, Holtec's reliance on its proposed Consolidated Interim Storage Facility (CISF) in New Mexico to store spent nuclear fuel is unjustified. The storage facility is not yet built or licensed, and would pose an unacceptable risk to environmental justice communities in New Mexico and along the transport routes to New Mexico.

In fact, neither New Mexico nor dozens of state agencies, municipalities, trade and industry groups, have consented to host Holtec's proposed CISF.

Thank you,
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