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Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

Comment On: NRC-2021-0036-0001

Palisades Nuclear Plant and Big Rock Point Plant Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

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General Comment

Palisades should shut for good, by May 31, 2022 at the latest. It never should have been constructed and operated in the first place. For health, environment, safety, and security's sake, it should have been shut down decades ago. So I welcome the fact that after May 31, 2022, a reactor core meltdown can no longer happen at Palisades, and that no more high-level radioactive waste will be generated.

However, the radioactive risks will continue, even after reactor shutdown. There is significant contamination of the entire site, with hazardous radioactivity and toxic chemicals. There is also a vast amount of high-level radioactive waste stored on-site, where it will almost certainly remain not for years, but for decades to come.

It is unacceptable to put crooked, untrustworthy companies like Holtec and SNC-Lavalin in charge of radiological clean up and high-level radioactive waste management at Palisades. They have already amply demonstrated elsewhere that they will do as little radiological clean up as they feel they can get away with, and will take hazardous shortcuts on high-level radioactive waste management so that they can account most of the Nuclear Decommissioning Trust Fund as their own profit. The radioactive risks left behind at Palisades will continue to haunt the public into the foreseeable future and beyond.

For these reasons, Palisades' (and Big Rock Point's), licenses should not be transferred to Holtec and its decommissioning partner SNC-Lavalin.

30 days is far from enough time for the public to prepare meaningful comments on this complex license transfer application. The risks of tritium contamination on the Palisades site will persist for more than a

century. The risks of cesium-137 contamination on the Palisades site will persist for several centuries. The risks of plutonium-239 contamination on the Big Rock Point site will persist for 240,000 years. The risks associated with the highly radioactive irradiated nuclear fuel stored at both sites will persist for a million years, or longer, into the future (Nuclear Energy Institute versus U.S. Environmental Protection Agency, U.S. Court of Appeals for the District of Columbia Circuit, case filed 2002, ruling issued July 9, 2004). Thus, an additional 60 days for the submission of public comments is a reasonable request, especially considering the ongoing burdens concerned citizens are facing due to the ongoing, deadly Covid-19 pandemic. Exacerbating the public's need for more time to comment is the fact that NRC has been posting many hundreds, perhaps even more than a thousand, documents in its Palisades docket, that are 25-years old, or older. These documents could well contain relevant information, such as re: past radioactive and/or toxic chemical spills on the site, contamination that must be cleaned up during the decommissioning phase. 60 additional days of public comment opportunity on the proposed license transfer will give not only the concerned public more time to analyze the newly posted documents for relevance, but will give Holtec more time to reconsider whether it really even wants to take over this contaminated site.

In addition, please consider the following technical, environmental, public health, safety, and security-related comments:

In 2006, as part of its resistance to the 20-year license extension at Palisades, a coalition of 25 local grassroots, multi-state regional, and even national groups, representing 200,000 Michigander members and supporters alone, submitted broad comments to NRC on its related Draft Environmental Impact Statement. The comments addressed a comprehensive array of concerns, including re:

- security
- highly radioactive waste storage, handling, and disposition, including transportation (very long overdue need for Hardened On-Site Storage)
- hazardous radioactive discharges to the environment, a risk to the food chain and drinking water supply downwind and downstream
- global warming impacts
- lack of revenues for the host municipalities such as Covert Township
- ratepayers and/or taxpayers left holding the bag
- threatened, endangered, or candidate species put at risk from radioactivity and/or toxic chemical releases, whether acute due to accident, or chronic due to leakage of contamination
- Indigenous Nations' interests, such as protection of burial sites, and other cultural properties, protection of treaty rights, etc.
- emergency preparedness in surrounding communities
- Environmental Justice
- compliance with Canadian-U.S. International Joint Commission commitments, including Boundary Waters Treaty obligations
- preservation of reactor components for analysis relevant to safety considerations for other aging reactors that are applying for permission to continue operating, for example Point Beach Unit 2's application for 80 years of operation.

These concerns remain relevant post-shutdown.