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

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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

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As a physician who understands the dire risk of radiation to public health, a lake swimmer and resident of a Great Lakes state that borders Lake Michigan, I urge the NRC to not transfer the licenses and ownership of the Palisades and Big Rock Point Nuclear Plant sites in Michigan from the current owner Entergy Nuclear to Holtec International.

I am happy that the continued production of radioactive waste will end as will the risk of a nuclear meltdown of the core when Palisades Nuclear Plant ceases operation by May 31, 2022. Palisades, like Point Beach Unit 2 across Lake Michigan, was named by the NRC around 2013, as one of the most neutron embrittled reactors still in operation, so the risk of accidental cracking of its pressure vessel and continued thermal contamination of Lake Michigan will end next spring. But I realize that high level radioactive nuclear waste will remain stored onsite for decades to come along with toxic chemical contamination of soil and water that occurred during energy production.

Although Big Rock Point was closed in 1997 and decommissioning was declared complete in 2006, there remains lingering contamination of soil, groundwater and sediments in Lake Michigan at this site which continue to be an environmental and health risk to the ecosystem onsite, nearby and populations living

downstream. There also remains at Big Rock Point seven casks of irradiated nuclear fuel and one dry cask of highly radioactive waste that need to be safely monitored and eventually disposed of without risk to the environment.

Holtec International and its collaborator, SNC-Lavalin are NOT the industries that should be put in charge of decommissioning Palisades and cleaning up the remaining contamination at Big Rock Point and fiscally responsible for the Palisade's Decommissioning Trust Fund (DTF). Holtec Int. has been shown to be irresponsible in waste cleanup at Oyster Creek Nuclear Plant (and under indictment for lying to state officials) in its home state of New Jersey and at Pilgrim in Massachusetts. Holtec is also the developer of a Consolidated Interim Storage Facility (CISF) for nuclear waste in New Mexico, a worrisome conflict of interest, in that "speedy" decommissioning of waste might also involve barge transfer on the Great Lakes or interstate rail or truck transport of this high-level radioactive waste to this CISF, if this CISF is approved. This would directly affect and put at risk not only Lake Michigan and Great Lakes communities supplies of drinking water but also poorer communities along rail lines and highways—these same communities already victims of environmental injustice—at elevated risk of serious health, ecological and economic damage should there be a transportation accident or act of sabotage/terrorism during transport.

I urge the NRC to not allow Holtec International or other "decommissioning" industries to be licensed to be in charge of rate payer's DTF but instead engage the Michigan State Comptrollers, Attorney General and public utilities commissions to be fiscally responsible for decisions and spending of this DTF for Michigan residents and taxpayers to ensure safe and effective decommissioning and appropriate remediation of radioactive and chemical contamination at Palisades and Big Rock Point Nuclear Plant sites.

Finally I urge, both with the pandemic, not having scheduled a public online/call-in comment session with NRC commissioners about this license transfer, issues with the NRC's un-user friendly (difficult to mine) website, that this whole process (which is discussing, in fact, many decades of work in the future and radioactive wastes that will continue to be a hazard for hundreds of thousands of years) to extend the time for meaningful public comment on this transfer of licenses and ownership of Palisades and Big Rock Point Nuclear facilities for a minimum of 60 additional days.