

# PUBLIC SUBMISSION

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**Docket:** NRC-2021-0036

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

**Document:** NRC-2021-0036-DRAFT-0054

Comment on FR Doc # 2021-02357

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## Submitter Information

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**Government Agency Type:** State

**Government Agency:** Don't Waste Michigan

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## General Comment

To: rulemaking.comments@nrc.gov

Subject: Docket ID-2021-0036-0001 / Palisades License Transfer Application

Attention: Scoping Comment Cognizant Officer for Palisades

Please consider these Scoping Comments regarding the License Transfer of Palisades from Entergy to Holtec.

Derecho

There have been two Derecho events at Covert Township which sits adjacent to Palisades. Straight line winds of 60-100 miles an hour come straight across the Lake Michigan from the west. Potential for uprooted trees, buildings, sheds, street light poles, unmoored propane tanks. All of these materials are potential Missiles that could impact equipment and ISFSI. Derecho, not addressed.

Singing Sands

Palisades sits on a geological base of sand known as 'Singing Sands' a particular rare geologic phenomenon where the granules of sand are round and do not pack. These 'Singing Sands' are susceptible and prone to blowouts where entire dunes can be rearranged with high winds of many origin. The Spent Nuclear Fuel stored a.k.a ISFSI is in harms way.

### New Madrid

Seismic / Earthquake considerations have not adequately encompassed the potential of the New Madrid fault. Liquefaction near the ISFSI could provide conduit to place Dry Casks into Lake Michigan. Thermal Shock to the fuel cladding at temperatures of 300-400 F being submerged into Lake Michigan has not been considered.

### Criticality

Criticality Accident scenario / potential resulting from Lake Michigan water coming in contact with breached Dry Casks has not been evaluated.

### Hurricane

In 1913 there was a White Hurricane Blizzard on Lake Huron with 100 mile winds. In 2012 Hurricane Sandy wrapped around the Great Lakes resulting in strait line winds on Lake Michigan with accompanying storm surge of waves.

### Seiche

Lake Michigan is known to be susceptible to Seiche - This has not been adequately evaluated.

### High Burnup Fuel

Because it is known and acknowledged by the Nuclear Waste Transportation Review Board in their September 23, 2019 Report that High Burnup Fuel will be too thermally hot, and too radioactive to be suitable for transport until at least the year 2100.

### Climate Change

With High Burnup Fuel is unsuitable for transportation, and with this accompanying delay, Climate Change must be projected at least 80 years out.

### Lake Erosion

Lake Michigan shoreline has been eroding at ever quickening pace. Lake Michigan is about to eat the western ISFSI pad, which does not meet seismic qualifications.

### Harden Shoreline

The Palisades shoreline must be hardened to keep Lake Michigan from ingesting high level nuclear waste which will irreparably contaminate the lake.

### No Dry Transfer System

The ISFSI / Dry Casks have no Dry Transfer System or Hot Cell. There is no way to deal with a leaking Dry Cask - Plans for overpack of STAR 100 will compound a radiological disaster. Validation and Verification are lacking, Quality Assurance is lacking.

### Indemnification Quantification

The commensurate risk of an ISFSI sitting on a known substandard foundation must be accompanied with adequate insurance coverage. Indemnification must be quantified and provided.

Monitoring Thermal / Radiological

Thermal Real Time Monitoring with Independent Verification is needed.

Radiation Real Time Monitoring with Independent Verification is needed.

Please address all of these Scoping Comments in the Draft EIS.

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