

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE SECRETARY

In the Matter of)	
)	Docket Nos. 50-255
Entergy Nuclear Operations, Inc.)	72-007
)	50-155
Palisades Nuclear Plant and)	72-043
Big Rock Point)	

AMENDED STANDING DECLARATION OF JODY G. FLYNN

I, Jody G. Flynn, declare as follows:

1. My name is Jody G. Flynn. I am 66-years old. For about 4 months every year, I live in my Lake Michigan cottage at 80036 Ramblewood Drive, Covert, MI 49043. The cottage lies less than a mile from the Palisades nuclear power plant.
2. The cottage has been in my family for a long time. My husband and I bought it in 1986. I brought up my four children going to the cottage, and they continue to visit the cottage. Nine of my family members also have cottages in the area.
3. While at the cottage, I regularly kayak, hike, and swim in the lake.
4. Before the Palisades nuclear power plant was constructed, the community regularly used that land. There were dunes and rope swings, and people would swim in the lake in front of the area. If decommissioning were done well, I think people would be able to use the land again like they had when I was younger. That's hard to imagine, however, with all my concerns with how the clean up will go.
5. Decommissioning of the power plant has been a source of concern for some time. I had hoped that the NRC would be the watchdog that would protect the community, but now I see that the new company is going to ask for exemptions on things that they don't want to do. There is a constant barrage of exemptions that the Palisades plant has asked for. I feel like the decommissioning will be less safe if the exemption is granted.
6. I understand that Entergy Nuclear Operations, Inc. and its subsidiaries have applied to the U.S. Nuclear Regulatory Commission for a license amendment that would allow it to transfer the operating licenses for the Palisades nuclear reactor and the Big Rock Point facility to Holtec Decommissioning International, LLC ("HDI"), a subsidiary of Holtec International ("Holtec"). It is also my understanding that after the license transfer, HDI's principal activity will be to decommission the Palisades and Big Rock Point sites. I also understand that HDI will be responsible for storage of spent reactor fuel at the site.

7. I do want the power plant to shut down, but the decommissioning process worries me. I know that decommissioning is a tricky business. I'm especially worried about the spent fuel on the land and that there is enough money for the cleanup costs. I'm concerned that there isn't enough money in the trust fund to cover the cleanup costs, and if there isn't enough money, Holtec won't be able to do a complete job. If there isn't enough money for Holtec to pay for decommissioning, I'm afraid that my water will be contaminated.
8. My concerns might be alleviated if Holtec was required to have more funding and if the State of Michigan oversaw the process. I've been concerned about the plant for years—so much so that I don't drink the water coming out of the wells around here. I don't plan on drinking the water during decommissioning either. However, I think I would feel better if the state were in an oversight position.
9. I also worry about unexpected costs and decommissioning needs during the decommissioning process. For example, decommissioning will require digging into the land, and I'm concerned that it could pull up pipes or materials that could release even more pollution into the area. More money for decommissioning might help reduce the chance of a poorly done decommissioning job.
10. I am a member of the Environmental Law & Policy Center and was a member when my original declaration was filed.
11. Accordingly, I have authorized the Environmental Law & Policy Center to represent me in this license transfer in order to seek conditions on the license transfer that will ensure full transparency and accountability by Holtec.
12. I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 26, 2021

Jody G. Flynn

