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Notice of Intent to Conduct Scoping Process and Prepare an Environmental Assessment Holtec Decommissioning International, LLC and Holtec Palisades, LLC; Palisades Nuclear Plant, Unit 1

Comment On: NRC-2024-0076-0001

Holtec Decommissioning International, LLC, and Holtec Palisades, LLC; Palisades Nuclear Plant; Notice of Intent To Conduct Scoping Process and Prepare an Environmental Assessment

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General Comment

I attended the presentation by the NRC in Benton, MI on July 11, 2024. The term “baseline” was repeatedly stated as what the environmental assessment would establish and then it would be determine what effect a restart of the Palisades Nuclear Plant would have from baseline.

This is concerning because it wasn’t made clear that if the baseline was a high safety risk would this require mitigation BEFORE a restart could occur? If a restart of an unsafe plant slightly impacted the safety profile (minimal change from baseline), would it be allowed to proceed because the “restart” was not that impactful?

The Palisades Nuclear Plant has been completely shut-down, was built in the 1970’s without today’s advanced technology and has been cited by the NRC as having one of the worst safety records. A restart is unprecedented, hence there is no “road map” as to what is required. At the very least, the process for relicensing should serve as the guide for the minimal standards for a restart. The NRC needs to evaluate all the safety citations that occurred 2-3 years prior to shut-down and their resolution as it’s been stated that the mitigation was not as rigorous due to the impending shut-down.

Due to the unprecedented nature of this restart by a company (Holtec) that is mired in controversy with no track record of running a nuclear plant, let alone restarting one, the NRC has to require that any restart puts safety as the highest priority. Michigan residents and the 40 million people that depend on Lake Michigan for drinking water need energy but also need to feel that this restart will not impact their health or quality of life.