

From: Edward Lawlor <eflawlor@gmail.com>
Sent: Friday, July 26, 2024 1:38 PM
To: PalisadesRestartEnvironmental Resource
Subject: [External_Sender] Palisades Community Meeting Comments

Dear NRC.

Please submit these written comments from the July 11 NRC Community Meeting on Restart.

Comments Submitted for the NRC Palisades Environmental Scoping Plan

Thank you for the opportunity to provide input into the NRC Environmental Assessment scoping process for the proposed restart of the Palisades Nuclear Plant in Covert Michigan. We have attended NRC Community Meetings on Palisades, including virtually the most recent meeting on environmental scoping on July 13th, 2024. I am disappointed that the transcripts of this meeting have not been released, especially in light of the quick turnaround required for these comments.

I am writing as the owner of one of the closest residences to the plant, 1.2 miles away to the North. Like respondents from Palisades Park, we also draw our drinking water from a well. From the information that has been released publicly, I oppose the reopening of the plant based on risks and benefits of an “experiment” with an already-decommissioned 53-year old plant. The incremental gain to the grid does not justify the safety and health risks of restarting such aged infrastructure with an inexperienced operator and a plant-lifetime of operational, safety, and environmental problems. The troubled history of the plant as well as the inexperience and performance problems of the proposed operator should warrant extra caution and due-diligence by the NRC. While I realize the huge financial and political momentum to get this plant (and additional small reactors) done as soon as possible, my understanding of the NRC’s mission and this process is to protect local residents such as ourselves.

At a minimum, with the stakes this high, the NRC needs to undertake a comprehensive evaluation of environmental and health impacts, including a rigorous EIS, as well as cluster analyses of cancers north and south of the plant.

Analyses of health and safety should include collaboration with the Michigan State Department of Health and Human Services and the CDC if appropriate, to rule out potentially high rates of cancers associated with the proximity of the Palisades discharges. Like the Palisades Park residents (south of the plant) who spoke at the NRC meeting, neighbors along the Ruggles Road corridor (north of the plant) have been speculating that recent cancer deaths in the neighborhood are related to the Palisades plant.

Unfortunately, we do not have confidence in the commitment of the NRC to monitor the groundwater in our location. We have attended meetings and made requests, but they were passed off at the time to Entergy, who was completely unresponsive. After our efforts, there was no subsequent testing of groundwater samples near our location or other follow-up from

the company or the NRC (See NRC, *Palisades Nuclear Plant, and Big Rock Point, 2022 Annual Radioactive Effluent Release and Waste Disposal Reports*, especially Table 1-12, REMP Program Locations, and Holtec's 2022 *Palisades Nuclear Plant Annual Radiological Environmental Operating Report*). The *Report* shows no groundwater monitoring in our area and no drinking water sampling. The Palisades Park sampling occurs only during summer months. It was illustrative that one of the Palisades Park residents who presented at the NRC Community Meeting indicated that he is paying for his own water testing out of concern for the lack of monitoring. This is unacceptable.

A complicating factor in an environmental and safety assessment is the proximity of the New Covert Generating Plant, a 1.17MW natural gas facility (for reference only 1.1 miles from our house), that is also producing significant emissions with known health risks. While natural gas generating plants have a reputation for being clean relative to coal, they still produce significant NO_x, CO, and other harmful emissions. Depending on wind conditions, the combination of plumes from the Palisades plant (when operating) and the New Covert Generating Plant can be extraordinary, blocking the sunlight. While the NRC can take the position that emissions from an adjacent natural gas plant is "not our problem," from the perspective of residents it is the cumulative risk to health that is the relevant question, especially as Holtec and the NRC contemplate adding additional nuclear plants.

While I fully understand the complexities of attributing any health impacts, including cancers to a particular source, this does not negate the responsibility of the NRC to thoroughly investigate these health risks. This is especially true in light of a future scenario that includes a precedent-setting plant restart and plans for future small nuclear reactors also on the site. As one of the NRC officials explained in the public meeting, the NRC EA process includes consideration of past, present, and future impacts.

If the restart process for Palisades continues, the NRC should conduct a comprehensive environmental, health, and safety impact assessment in collaboration with other key public health agencies. The analysis should rigorously study concerns about clusters of cancers that have been raised by local residents. We specifically expect groundwater and drinking water sampling at or near our location. I also believe a comprehensive analysis of the combined impact of power generation discharges (nuclear and natural gas) on local residents and users of Van Buren State Park is necessary.

Thank you for your consideration.

Edward F. Lawlor, Ph.D.

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