

# PUBLIC SUBMISSION

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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

**Document:** NRC-2024-0076-DRAFT-0052

Comment on FR Doc # 2024-14112

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## Submitter Information

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## General Comment

Due to safety and environmental concerns, I oppose the restart of the Palisades Nuclear power plant. The idea of restarting a 50-year-old nuclear power plant that has been sitting idle, with a long history of serious problems is very disconcerting.

Our family home of over 50 years is less than one mile south of the plant in a community that was established in 1905. Any attempt to restart the plant in any respect will be an experiment with tremendous risk to our health and property. This “first of its kind” restart on such an aged and neglected facility should not be permitted due to the very high risk it presents to the community and the entirety of Lake Michigan itself and her residents.

We have a unique and rare natural environment on the shores of one of the most important bodies of fresh water in the world. The best decision for current and future generations is to dismantle the plant and restore the property to its natural state as was the plan when Holtec took control in 2022.

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## Attachments

Palisades Park Comment to NRC on Palisades Nuclear Plant Environmental Review2

## **Comment on Behalf of Palisades Park on Scope of Environmental Review of Holtec's Request to Restart Palisades Nuclear Plant**

Docket ID NRC-2024-0076

July 23, 2024

This comment is submitted on behalf of Palisades Park, the residential community abutting Palisades Nuclear Plant (PNP) to the south. Palisades Park was founded in 1905 and currently has over 200 homes. The great majority of these homes existed at the time PNP began operations in 1971 so we are familiar with the realities of having this nuclear power plant as our neighbor. After 50 years of operations, the plant was in financial distress, maintenance was deferred, and its owner shut it down – permanently. Or so we, the public and the NRC were told. Now, the new owner of the plant seeks to do what has never been done before – take a nuclear facility back on line that is no longer licensed to be operated or have fuel emplaced into the reactor vessel.

Our community appeals to the NRC to employ its Congressionally-mandated oversight authority over PNP to conduct a thorough and rigorous environmental review of Holtec's request. The NRC and DOE should require an environmental review that is *at least as* comprehensive as what the NRC requires for an *operating* plant applying to renew its license, known as "subsequent license renewal" (SLR). The NRC's recent rulemaking on the scope of the review required for SLR confirms that Section 102(2) of the National Environmental Policy Act, implemented through 10 CFR Part 51, requires the preparation of an Environmental Impact Statement (EIS). The environmental review of Holtec's application must do at least that - and even more - because of the unique risks arising from restarting PNP.

Holtec's requested restart license present environmental risks and unknowns greater than an operating plant that seeks an extension of an existing license. For years, PNP's operator ran the plant knowing it was on a schedule to shut down permanently. PNP's operator deferred maintenance and investment based on this timeline. Simply stated, it operated the plant as a short-timer, not as if it would need to be on line through 2031, the expiration date of its then-existing license. The NRC granted waivers for safety upgrades that otherwise would have been required but for the imminent shut down. An additional risk here is the requested issuance of a new license to an entity that has never operated a nuclear power plant. If the EPA mandates a rigorous EIS when determining whether an *operating* plant with an experienced licensee and ongoing investment and NRC oversight should be allowed to continue operating beyond its license term, shouldn't the EPA – and the NRC and DOE – require at least an EIS when a plant that has been shut down and not subject to the same level of review as an operating plant seeks to restart?

Holtec's request presents to the NRC and DOE an important and novel environmental impact question: can this plant, with its history of financial distress, aging infrastructure, deferred maintenance, and degradation from being out of operation, be restarted and operated safely without causing unacceptable risk to the immediate community, environment and the cherished

resources of the Great Lakes? Answering this question requires the highest level of environmental review – an EIS that is directed to the unique circumstances of this plant and the unprecedented request before the NRC to restart a permanently shut down nuclear facility.

Respectfully submitted,

Palisades Park Board of Directors