

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

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Comment on FR Doc # 2024-14112

Submitter Information

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General Comment

please see attachment in opposition of the PNP

Attachments

PNP no start letter

George Relias
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July 29, 2024

RE: Palisades Nuclear Plant

I am opposed to the reopening of the Palisades Nuclear Power Plant due to the inherent risks associated with nuclear energy to the neighboring community. Should the power plant re-open it should be with the appropriate review and rigorous safety procedures developed for such an unorthodox reopening as outlined below.

I appeal to the NRC to employ its Congressionally-mandated oversight authority over PNP to conduct a thorough and rigorous environmental review of Holtec's request to restart the Palisades Nuclear Power Plant. 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.

I and my family are NOT in favor of restarting this power plant due to the potential risks associated with nuclear power and the checkered operational history. To restart this power plant is a mistake.

Sincerely,

George J. Relias
Neighbor