

# PUBLIC SUBMISSION

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 ADD: Laura Willingham, Mary  
 Richmond, Antoinette Walker-  
 Smith, Marlayna Doell, Mary  
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**Docket:** NRC-2024-0076

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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## Submitter Information

**Name:** Anonymous Anonymous

**Email:** jhutar@msn.com

## General Comment

The Palisades plant has had the worst Operating Experience of any reactor in the U.S., regarding Control Rod Drive Mechanism seal leakage. The first leaks were in 1972, in the first year of full power operations. They have continued since. In fact, Entergy's decision to close Palisades for good on May 20, 2022 was 11 days earlier than scheduled, because of the most recent CRDM seal leak. Palisades' owners, now Holtec, have never determined the root cause, nor taken comprehensive corrective action, to solve this problem, instead relying on mere, short-lasting BAND-AID fixes. Given their location very near the reactor core, replacement of CRDM seals exposes workers to significant doses of hazardous radiation, putting their health at risk. In just one episode a decade ago, nearly 200 workers — including women of child-bearing age — got on average 2.8 Rem of exposure on a month-long CRDM seal replacement job. Internationally, nuclear workers are limited to 2 Rem of exposure for an entire year. CRDM seal leaks involve reactor core primary coolant water, so represent yet another pathway to meltdown. Furthermore, the loaded hot cask fiasco from 1994 is still violating the earthquake regs of NRC and any conversion to SMR site or even any operating extensions cannot be initiated before the site is as pristine as in 1966! Holy Shiva, Holtec Krishna is turning into MrBurns with little regard for Federal or State regulations. Decommission process has to be expeditiously and safely completed, resulting in permanently removing any traces of nuclear material from the shores of Lake Michigan, the source of drinking water for 40 million people.