

**From:** Kevin Kamps <kevin@beyondnuclear.org>  
**Sent:** Monday, July 29, 2024 11:57 PM  
**To:** PalisadesRestartEnvironmental Resource  
**Subject:** [External\_Sender] Docket ID NRC-2024-0076 -- Beyond Nuclear's public comments in response to "NRC Seek(ing) Input on Environmental Review Topics for Palisades Nuclear Plant Restart Application"

ID NRC-2024-0076

Submitted via email to: <[PalisadesRestartEnvironmental@nrc.gov](mailto:PalisadesRestartEnvironmental@nrc.gov)>

To Whom It May Concern at NRC,

Please find below my environmental scoping public comments, submitted on behalf of Beyond Nuclear's members and supporters in the Great Lakes State, throughout the Great Lakes Basin, and beyond, downwind, downstream, up the food chain, and down the generations from Holtec's zombie reactor restart and so-called "Small Modular Reactor" new build schemes, at the supposedly "permanently closed for good" Palisades nuclear power plant in Covert Township, Van Buren County, Michigan. Please include in your official consideration the hot links to further documentation as part and parcel of my comments.

---Kevin Kamps, Radioactive Waste Specialist, Beyond Nuclear

### **REACTOR RISKS AND IMPACTS ON THE ENVIRONMENT**

---*The Palisades zombie reactor restart is unprecedented, entirely unneeded, extremely high-risk, [insanely expensive for taxpayers and ratepayers](#). NRC's Environmental Assessment is nowhere near enough. A full-blown Environmental Impact Statement is called for regarding this major federal action -- a very hard look is required. In fact, because the Palisades closed reactor restart precedent is now being applied elsewhere -- Three Mile Island Unit 1 in Pennsylvania, Duane Arnold in Iowa, and Diablo Canyon in California (where Unit 1 was supposed to close this year, and Unit 2 next year), etc. -- a Generic or Programmatic EIS is necessary. Along the same lines, a 30-day public comment period is insufficient. NRC should extend the public comment period to 180 days. Holtec's rush to restart Palisades is no excuse for a short public comment period -- in fact, the rush job itself could significantly increase the environmental risks and worsen the impacts.*

---*The No Action Alternative is preferred. The nearly 60-year old (ground was broken in 1967) Palisades atomic reactor should remain closed for good, as it has been since May 20, 2022. Renewables like wind and solar power, efficiency, and storage are much more preferable alternatives. They can readily replace Palisades' 800 Megawatts-electric (MWe), and do so much more cost-effectively, cleanly, safely, securely, promptly, and reliably than the zombie reactor restart scheme, and Holtec's inextricably connected SMR-300 (so-called "Small Modular Reactors" of 300 MWe each) new builds scheme at Palisades, as well as at its sibling closed and decommissioned (although still radioactively contaminated, and still storing high-level radioactive waste on-site) Lake Michigan shoreline reactor site, Big Rock Point near Charlevoix.*

---*Concerns, usually framed as safety-related, are also most relevant to negative environmental impacts, including LARGE ones. A reactor core meltdown at the Palisades zombie reactor would have extremely*

LARGE negative environmental impacts, in the National Environmental Policy Act (NEPA) lingo. Palisades has long had multiple high-risk pathways to meltdown. They include the single worst neutron-embrittled reactor pressure vessel in the country, and perhaps the world, at risk of through-wall fracture. They also include steam generators, and a reactor vessel closure head, or lid, that have needed replacement for two decades. [Fire protection](#) and containment coating/sump strainer upgrades, also needed 20 years ago, have likewise been largely to entirely neglected. According to retired Union of Concerned Scientists nuclear safety director Dave Lochbaum, fire represents 50% of the risk of core meltdown at atomic reactors. And inadequate sump strainers mean that containment coating debris could clog emergency cooling water flow pathways, [as former Entergy senior engineer Alan Blind, who worked for six years at Palisades, has explained](#). All these admissions about safety-significant systems, structures, and components in need of replacement, or significant upgrade, were [made by Palisades' initial owner, Consumers Energy, to the Michigan Public Service Commission, in spring 2006](#). Yet Entergy never fixed any of this, during its ownership tenure from 2007 to 2022 -- because [the industry-captured NRC, in full regulatory retreat, did not require it](#). Now Holtec plans to continue to run Palisades into the ground, with at best inadequate monitoring and minimal repairs. In mid-2022, Holtec had paid some lip service to repairing tubes, or even entirely replacing the steam generators (at a cost of \$510 million), in a [secret bailout application to DOE](#), obtained from the State of Michigan via a Freedom of Information request submitted by Beyond Nuclear. But recently, Holtec spokesman Nick Culp revealed the company no longer plans to repair or replace the dangerously age-degraded steam generators. (["Palisades Restart Still Faces Significant Hurdles," by Jessica Sondgeroth, NUCLEAR INTELLIGENCE WEEKLY, Vol. 18, No. 14, April 5, 2024.](#))

---Palisades has also 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](#) during just a short, 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.

---These risks have actually increased since permanent shutdown on May 20, 2022, due to lack of active maintenance by Holtec -- which has no experience operating an atomic reactor -- on safety-significant systems, structures, and components. This includes: lack of chemically-preservative "wet layup" on the steam generators, accelerating already severe corrosion; no testing of valves and pumps to ensure reliability; and no regular rotation of the turbine-generator shaft, which is thus bending under its own immense weight. The latter could lead to a mechanical explosion, hurling chunks of shrapnel weighing hundreds of pounds each outwards, including into the control room, where operators could be injured or killed, and safety/cooling systems could be rendered inoperable. Such a mechanical explosion of the bent turbine-generator shaft at Fermi Unit 2 in Monroe County, MI on Christmas Day, 1993, led to two million gallons of radioactive wastewater being dumped into Lake Erie's biologically rich -- but shallow, and fragile -- Western Basin.

---The extremely LARGE negative environmental impacts of a meltdown at the Palisades zombie reactor would include large-scale airborne fallout and water-borne outflow of hazardous radioactivity into Lake

Michigan, as well as wind-driven/precipitation-delivered fallout onto land. Such airborne fallout from Chernobyl in 1986 severely contaminated not just the "breadbasket of Europe" (Ukraine), but also sheep farms in Scotland, Sámi reindeer herding grounds in the Scandinavian Arctic, Lake Constance bordering Bavaria, Germany, and elsewhere -- not just hundreds, but even thousands of miles downwind. Radioactive fallout and wastewater discharges into the Pacific Ocean from Fukushima Daiichi in Japan did not end in spring 2011 -- the tritiated wastewater discharges will now continue for decades, intentionally, despite the risks to humans via Pacific fisheries. These are cautionary tales for Van Buren, as well as Berrien, Allegan, and Kalamazoo counties -- a major agricultural breadbasket of Michigan, not to mention a "Pure Michigan" tourism/recreation Mecca. The late, great Maynard Kaufman, a Bangor farmer-author, founder father of Michigan Organic Food and Farm Alliance, and watchdog on Palisades since before ground was even broken in 1967, warned about these impacts on Palisades-area agriculture for decades on end. And, as an expert witness for the environmental coalition opposed to Palisades' restart -- [Arnie Gundersen, chief engineer at Fairewinds -- warned](#) a decade ago, a Fukushima-scale radioactive disaster at Palisades would be catastrophic for Lake Michigan, and the rest of the Great Lakes downstream and downwind. The Great Lakes comprise 21% of the world's surface fresh water, 84% of North America's, and 95% of the U.S.A.'s. The Great Lakes serve as drinking water for more than 40 million people in eight U.S. states, two Canadian provinces, and a large number of Indigenous Nations. To put this all at risk with the unneeded Palisades zombie reactor restart is nuclear madness. The hazardous persistence of artificial radioactive pollutants that would escape into the environment due to a reactor core meltdown are nightmarish: Tritium (radioactive Hydrogen, which can go anywhere in the human anatomy, right down to the DNA molecule), 123 to 246 years of hazard; Cesium-137 (a muscle-seeker), around 300 to 600 years of hazard; Strontium-90 (a bone-seeker), around 300 to 600 years of hazard; Carbon-14 (which can also go anywhere in the human body, right down to the DNA molecule), 55,000 to 110,000 years of hazard; Plutonium-239, 240,000 to 480,000 years of hazard; Iodine-129, 157 to 314 million years of hazard; to name but a small number of the more than 200 hazardous artificial radioactive isotopes contained in irradiated nuclear fuel -- or, worse yet, NOT contained, but blowing with the wind, and flowing with the water, contaminating air, soil, food, drinking water, and the rest of the ecosphere, in the event of a meltdown!

---Risks at the zombie reactor, and their impacts on the environment, will be exacerbated by reactor risks at the SMR-300s Holtec also proposes building on the tiny, 432-acre Palisades site. In addition to having no experience operating atomic reactors, Holtec also lacks any experience building atomic reactors. The nearly 60-year old reactor will have worsening age-related degradation, breakdown phase risks, from August 2025 to 2051 (Holtec has announced application for a 2031 to 2051 license extension, amounting to 80 years of operations, twice the initial 40 years.) The so-called "Small Modular Reactors," of 300 Megawatts-electric each, will have their own break-in phase risks. Chernobyl Unit 4 in Ukraine in 1986, Three Mile Island Unit 2 in Pennsylvania in 1979, and Fermi Unit 1 in Monroe County, Michigan in 1966, are examples of break-in phase reactor disasters. Three reactors operating on the tiny, 432-acre Palisades site would also represent a risk of multiple, domino-effect reactor core meltdowns, as happened at Fukushima Daiichi, Japan in March 2011, and which was narrowly averted at the four-reactor Chernobyl complex in 1986, but only through extraordinary efforts and self-sacrifice by plant personnel, fire fighters, etc., who paid a very heavy price with their health and even their lives.

---SMR-300s are not "small." They are 4.5 times larger than Big Rock Point's previous reactor -- [one of the worst radioactive polluters in the entire country](#), despite its relatively small, 67-MWe size. Fermi Unit 1, also a relatively small 67-MWe reactor, partially melted down on October 5, 1966 -- and "[we almost lost Detroit.](#)" As Holtec CEO Krishna Singh himself has pointed out, the two SMR-300s at Palisades would nearly double the nuclear mega-wattage on the small 432-acre site (800 MWe + 600 MWe). This would

represent a very concentrated amount of nuclear risk and radioactive environmental impact on the tiny site.

---But it doesn't take an accident. Palisades' so-called "routine releases" of hazardous radioactivity since 1971 have been significant. These include [planned and permitted radiation releases](#), but also [unplanned/unpermitted leaks and spills](#). Palisades' "routine" releases of radioactive and toxic chemical wastewater into Lake Michigan -- including seasonal "batch releases" -- are harmful to Lake Michigan, its fisheries and ecology. Lake Michigan serves as the drinking water supply for a very large number of shoreline communities, from South Haven, to Michigan City, IN, Chicago, IL, Milwaukee, WI, and beyond. Some 16 million people drink Lake Michigan water, not only in Michigan, but also Indiana, Illinois, and Wisconsin. Such discharges of artificial radioactive substances from Palisades into Lake Michigan do not dilute -- they increase the concentration of such artificial radioactive hazards in the Lake, and in fact the radioactivity bio-accumulates, bio-concentrates, and bio-magnifies up the ecosystem and food chain, as via fisheries, harming animals at the top of the ecosystem/food chain, from predators to people. [As the U.S. National Academies of Science have repeatedly confirmed for decades, citing the long-established "Linear, No Threshold" theory which forms the very foundation of the Biological Effects of Ionizing Radioactivity reports](#), any exposure to ionizing radiation, no matter how small, still carries a health risk, such as cancer causation; and such risks accumulate over a lifetime. Truth be told, such risks are not limited to cancer, but also include radiogenic birth defects, genetic damage, and a very long list of other health risks, maladies, and morbidities. Given that Lake Michigan water is also used for agricultural irrigation, hazardous radioactive contamination of the food supply can also occur via this exposure pathway.

---The environmental impacts at the nearly 60-year old zombie reactor cannot legally be segmented from the environmental impacts at the SMR-300 new builds. These are not only radiological but also physical. For example, the construction of two 300-MWe reactors on the tiny, 432-acre Palisades site would wreak further havoc with the fragile, endangered forested dunes ecosystem there. It would also threaten Indigenous cultural properties very likely located there, including sacred ancestral burial sites.

---The Palisades zombie reactor restart will involve cumulative effects, on top of the 1971-2022 operational impacts on the environment thus far. This will include not only "routine releases" of hazardous radioactivity and toxic chemicals (planned/permitted, as well as unplanned/unpermitted leaks, spills, etc.) from 2025 to 2051 at the restarted zombie reactor (likely worse than in the past, given the nuclear power plant's severe age-related degradation), but also "routine releases" from the SMR-300 new builds. The environmental impacts are not only cumulative, but also synergistic. As Rachel Carson warned in her iconic book [Silent Spring](#) in 1962, credited with helping launch the environmental protection movement, hazardous ionizing radioactivity and toxic chemicals have synergistic negative impacts on the environment -- the harm from the synergistic hazardous exposures is greater than the sum of their individual parts.

---Palisades' location, in Covert Township, Michigan, raises serious Environmental Justice concerns. The Palisades Park Country Club resort community, nearly 120-years old, is located immediately south of the nuclear power plant, sharing property lines. There are reportedly elevated rates of cancer and thyroid pathology in that 200-cottage community. Covert Township itself has a large African American population, and also a high rate of low income households. Covert Twp. has a rich African American cultural history. The area is also Anishinaabe aki, specifically Pokagon Potawatomi traditional land. The Palisades zombie reactor restart, as well as the SMR new builds, put this all at risk, including from extremely LARGE environmental impacts.

---Making all the risks and impacts LARGER and worse is the fact that, in addition to its inexperience (the company has never operated, nor constructed, an atomic reactor), it is also incompetent, corrupt, and even criminal. Newly revealed scandals swirl around Holtec on a frequent and continuing basis. As but the latest example, a long-serving, top Holtec advisory board member, George E. Norcross III, [was recently indicted by the State of New Jersey Attorney General on 13 racketeering felony charges](#). For more background info., see: "[Holtec: Criminality, Corruption, Incompetence, and Inexperience](#)" (2 pages, published March 27, 2024). Also see an earlier [annotated bibliography, "Radioactive Skeletons in Holtec's Closet,"](#) chronicling the company's countless misdeeds.

## **RADIOACTIVE WASTE RISKS AND IMPACTS ON THE ENVIRONMENT**

---The actual past and potential present and future environmental impacts resulting from the ongoing (1971 to the present, and counting) radioactive waste crisis at Palisades are also LARGE. More than 800 metric tons of highly radioactive irradiated nuclear fuel have accumulated on-site at Palisades. Around two-thirds is still stored in the wet indoor storage pool; one-third is stored in a growing number of outdoor dry casks, very near the Lake Michigan shore. As with operating reactor core meltdowns, catastrophic amounts of hazardous radioactivity can also be released into the environment from radioactive waste disasters, such as a fire in the pool-stored waste, or a dry cask breach. As a matter of fact, [Palisades narrowly averted catastrophe in October 2005](#) under previous owner Consumers Energy, due to the near-drop of a 107-ton load into the pool: the floor could have been pierced, draining cooling water, leading to overheating and ignition of the zirconium metal cladding of the stored highly radioactive irradiated nuclear fuel. Since the pool is not located within a radiological containment structure, radioactivity releases from the hundreds of metric tons of densely packed fuel would be large-scale, and directly into the environment. [Princeton University researchers reported in 2016](#) that a radioactive waste pool fire could contaminate a large region of the United States downwind, leading to millions of nuclear evacuees, and trillions (with a T) of dollars in property damage. A near-miss waste pool fire at Fukushima Daiichi Unit 4 in March and April 2011, very narrowly [averted through sheer luck](#), led the then-serving Japanese Prime Minister, Naoto Kan, to order a secret emergency contingency plan to evacuate 35 to 50 million people from northeastern Japan and metro Tokyo. He revealed the secret a year later, and said it would have been the end of the Japanese state. The Palisades pool is more densely packed with irradiated nuclear fuel than was the pool at Fukushima Daiichi Unit 4. This is a part of the scandalous con job, or bait and switch trick, Holtec pulled to get its hand on Palisades in the first place. Holtec said it would decommission Palisades, not restart it. An early part of its "prompt decommissioning" was to have been expedited transfer of spent nuclear fuel from the indoor wet storage pool to safer (but still not safe) dry cask storage. But Holtec's zombie reactor restart scheme has led it to keep the pool packed to the gills, for an indefinite period, exacerbating pool fire risks.

---Dry cask storage at Palisades has been controversial and risky from the start in 1993. The fourth cask to be loaded, in summer 1994, was quickly announced by then-owner Consumers Energy to be defective. Consumers Energy had assured the public that any problems with casks would be easily resolved by simply returning the highly radioactive waste to the indoor wet storage pool. NRC backed this up, including under oath in a federal court room in Grand Rapids, MI, when State "Eternal General" (Attorney General -- he served 37 years, still a national record) Frank Kelley legally challenged the loading of the casks in the first place. ([By 1997, Dr. Mary Sinclair of Don't Waste Michigan pointed out that perjury had likely been committed.](#)) Although Consumers Energy initially assured the public it would live up to its previous promise, and promptly at that, 30 years have now passed, and the defective cask

still sits fully loaded, 150 yards or less from the shoreline of Lake Michigan. Complications previously identified and warned about by environmental watch-dogs proved accurate. Grinding through welds on the lid, and removing pressure fit shims, would contribute to missing the 40-hour deadline for transferring the fuel from the defective dry cask back into the pool -- convection air current cooling would be disrupted -- violating Technical Specifications related to fuel- and cask-overheating. Even then, lowering the thermally hot (up to 750-degree Fahrenheit) containerized fuel into the 100-degree F pool water would cause a thermal shock to fuel and container, exacerbating degradation. It would also cause a radioactive steam flash, most hazardous to nearby workers and local residents or visitors, such as those at Palisades Park Country Club immediately to the south, and/or Van Buren State Park, immediately to the north.

---In February 1994, Dr. Ross Landsman, dry cask storage inspector at NRC Region 3 in Chicago, [warned the agency](#) that the original storage pad at Palisades for dry casks, just 150 yards or less from the water of Lake Michigan, violated NRC earthquake safety regulations. This was due to the pad "floating" on 55-feet of loose sand underneath, anchored to nothing. He warned that even a mild earthquake could part the beach, allowing the Lake to fill the void. One or more dry casks could be buried under sand, leading to overheating. Or, they could tumble into the Lake, submerging. Breaches of casks could then lead to radioactive releases into the Lake. Dr. Landsman, then retired from NRC and serving as an expert witness for the environmental coalition opposing Palisades, warned in 2006-2007 that the second pad at Palisades, located somewhat further inland from the Lake, [also violated NRC earthquake safety regulations](#). In Holtec's own December 2020 Post-Shutdown Decommissioning Activities Report, the company seemed to lend credence to Dr. Landsman's warning about the nearer-Lake, older pad -- Holtec proposed transferring all the dry casks to the newer pad, further inland. But given Dr. Landsman's 2006-2007 warning about the newer pad, this could simply be jumping from the frying pan into the fire.

---A breached, submerged cask could also lead to an inadvertent nuclear criticality in the highly radioactive waste. If the waste formed a critical mass during the disaster, infiltrating Lake water could serve as a neutron moderator, sparking a chain reaction. This would worsen radioactive releases into the Lake, and would make emergency response operations a potential suicide mission, given the fatal radiation emissions due to breach of radiation shielding, as well as containment. [Another pathway to such a catastrophe is Holtec's, and DOE's, proposed barge shipments of highly radioactive waste, from Palisades to the Port of Muskegon](#). The more waste Palisades generates, the more pressure Holtec will exert, and the more shipments there would be, involving barging highly radioactive wastes on Lake Michigan, bound for [the company's proposed dumpsite in New Mexico](#).

---The closure-for-good of Palisades by Entergy on May 20, 2022 meant that no more radioactive waste would be generated there. But the proposed restart would mean that the highly radioactive waste inventory stored on-site at Palisades would grow by around 15 metric tons per year, from 2025 to 2051. Thus, the associated LARGE impacts on the environment would also grow. Holtec's proposed SMR-300 new builds at Palisades (and also at Big Rock Point), due to loss of economy of scale, would each generate more highly radioactive waste, per unit of electricity generated, than the zombie reactor. Drs. Allison Macfarlane, and Rodnew Ewing, President Obama's NRC chair and U.S. Nuclear Waste Technical Review Board chair, respectively, reported recently that, depending on their specific design, SMRs will generate 2 to 30 times the radioactive waste, as compared to current reactors, per unit of electricity generated. But similar things can be said regarding thermal wastewater discharges, cost per unit of electricity generated, etc. Thus, Holtec's SMR new build schemes would exacerbate the already LARGE impacts on the environment and socio-economics of its zombie reactor restart scheme.

## **CLIMATE DESTABILIZATION**

Exacerbating the LARGE and worsening nuclear risks for and radioactive impacts to the environment described above is the issue of [extreme weather and natural disasters due to climate chaos](#). In 2020, Lake Michigan had historic high water levels. This meant that the Lakeside dry cask storage was significantly closer than the often cited 150 yards to the waters of Lake Michigan. Whether it is tornadoes, hurricanes (like the deadly White Hurricane (blizzard) of 1913 on Lake Huron, the natural disaster causing the largest loss of life on the Great Lakes and its shores in history), floods, Lakeside erosion of fragile sand dunes and beaches, wildfires, etc., the list of extreme weather threats to the reactor(s) and radioactive wastes at Palisades is already long, and growing with worsening climate destabilization. Institutions such as [the Government Accountability Office](#) (GAO, Congress's investigative arm), and [a Yale University scholar](#), have excoriated NRC for neglecting climate risks, and have questioned the U.S. nuclear power industry's ability to operate reactors (and on-site radioactive waste storage, for that matter) safely, during ever more extreme weather conditions associated with worsening climate chaos. NRC cannot be allowed to ignore such climate risks in the context of the Palisades zombie reactor restart and SMR new build schemes, nor their inevitable potential for extremely LARGE negative impacts on the environment.

---For more environmental review topics that NRC should address, see our environmental coalition's extensive and comprehensive public comments to NRC in opposition to Palisades' 2011-2031 (60 years of operations) license extension:

May 18, 2006: [Group comments, submitted by a coalition of organizations including NIRS and numerous grassroots groups in Michigan and other U.S. states and Canadian provinces around the Great Lakes Basin, regarding NRC's draft Environmental Impact Statement on the Palisades 20 year license extension](#). This coalition represents well over 200,000 residents of Michigan alone, in opposition to the dangerous extension of operations and waste generation at Palisades from 2011 to 2031.

May 18, 2006: [Executive summary of coalition comments to NRC regarding its draft Environmental Impact Statement for the Palisades 20 year license extension](#).

Although from 18 long years ago, most of our points have never been adequately addressed, if addressed at all! In fact, our concerns have grown deeper. Thus, they are still very relevant.

---For yet more environmental review topics relevant to the Palisades zombie reactor restart scheme, and the SMR new build schemes, see the following posts:

<https://beyondnuclear.org/background-info-on-holtecs-zombie-reactor-restart-and-small-modular-reactor-new-build-schemes-on-the-lake-michigan-shore/>

<https://beyondnuclear.org/newest-nuke-nightmares-at-palisades-2022-present/>

<https://podcast.rogerrapoport.com/episodes>

On March 27, 2024, **Beyond Nuclear** published three new backgrounders: "[\*\*A People's History of the Palisades Atomic Reactor\*\*](#)" (13 pages); "[\*\*Nuclear Nightmares: Palisades' 'Zombie' Reactor Restart and SMR New Build Schemes\*\*](#)" (3 pages); "[\*\*Holtec: Criminality, Corruption, Incompetence, and Inexperience\*\*](#)" (2 pages).

**Beyond Nuclear** has also published: [\*\*a breakdown of the \\$15.7 billion, and counting, in bailouts at Palisades and Big Rock Point\*\*](#); and a major exposé based on Freedom of Information Act revelations regarding [\*\*Holtec's 'nuclear white elephant' secret plans to build SMRs at all its decommissioning sites, as well as to re-nuclearize Palisades, using many billions of dollars of federal and state taxpayer, as well as ratepayer, bailouts.\*\*](#)

<https://www.sierraclub.org/michigan/blog/2024/05/reopening-palisades-nuclear-power-plant-creates-many-risks>

<https://www.sierraclub.org/michigan/blog/2024/02/should-palisades-nuclear-plant-be-brought-back-life>

<http://archives.nirs.us/reactorwatch/licensing/palisades.htm>

Please take a hard look at my comments, as NEPA requires.

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Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.



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