

Due to the imposed time constraints for comments today, I have submitted the full text of my statement to the NRC Docket and members of the press. I regret that the public will not have the opportunity to hear my complete comment today.

My name is Alan Blind, and I am a resident of Baroda, Michigan. I am speaking on behalf of the residents of Palisades Park in Covert, Michigan.

Governor Whitmer supported continuing operations at Palisades, yet Entergy shut down the plant, surrendered its operating license, and sold it as “junk,” suitable only for decommissioning. These actions should not be easily reversible.

Holtec has proposed exploiting a loophole from a NRC denial letter concerning a 2019 Petition for Rulemaking for a fast and easy way to allow it to reload fuel and operate Palisades.

If allowed, this will permit Holtec and the NRC to evaluate today's proceedings with very little public involvement under a “fast and simple” process. This process has already been used to allow NRC to agree with Holtec's “Motion for Secretary Order, denying public hearings”

The petitioner appealed the Holtec proposed order to not allow public hearings; and captured our concern today:

The device of exemption here is being invoked to camouflage the actual nature of the request, which is a license amendment. The exemption being sought would relieve Holtec from adhering to the core regulations the Atomic Energy Act imposes to ensure safe regulation of commercial nuclear power plants in the interest of public health and safety, as well as environmental protection.

Exemptions are for short-duration bypasses of NRC regulations, not for reversing a major licensing event. This request for permission to restart is a major change that requires full-blown ... licensing proceedings."

Back to my comment today, The residents of Palisades Park and I request that the NRC General Counsel approve the current NRC staff interpretation of the Holtec/NRC's use of selected words, in part and in whole, taken out of context from the denial of "PRM-50-117", dated February 19, 2019.

As a better approach, we request that the NRC agree with our Petition for Rulemaking to include an NRC Commission-approved process for returning a decommissioned plant to operational status.

Thank you.

Who Am I?

- A. Alan Blind
- 1975-1997: Site Vice President: American Electric Power Cook Nuclear
- 1997 - 2002: Consolidated Edison of NY. Indian Point. Vice President Nuclear
- 2002-2003: Ontario Power Generation: Pickering. Pickering One Restart
- 2006 - 2013: Entergy Nuclear Operations. Palisades. Engineering Director.

Definition of "Is it Safe?".

My standard of safety is met when any nuclear plant, including Palisades, meets all NRC Design Criteria.

10CFR50 includes all of the NRC requirements, including Design Criteria. Current Design Standards includes all of the collective experience over the last 50 years of commercial power design, building and operations.

What are my concerns about a Palisades Restart?

Broadly speaking, I have two concerns; 1) NRC Full Commission Must be Involved, and 2) project justification, cost and schedule. This is a matter of public interest given the use of State and Federal subsidies.

I petition the full NRC Commissioners to codify the process used to define the required, minimum design basis for Palisades. NRC staff recognizes there are no codified regulations for restarting, such as Palisades. Holtec is asking to use a modern process, meant for new

plants, at the same time requesting a design basis that predated NRC design requirements, be used. This is unreasonable and the full commission needs to step in and define the startup process for Palisades.

Basic project management requirements include firm scope definition. Given the large number of unknowns stemming from the lack of information of equipment condition, especially the steam generators, and unknown number of safety upgrades, and lack of an agreed upon design standard and NRC inspection program, it is impossible for any company to plan out, schedule and cost estimate a large project such a Holtec is proposing. Given even the current cost and schedule estimates, the project cannot possibly be in the state, federal, and rate payers interest.