

# PUBLIC SUBMISSION

SUNI Review Complete  
Template=ADM-013  
E-RIDS=ADM-03

ADD: Mary Richmond,  
Antoinette Walker-Smith,  
Laura Willingham, Mary  
Campestrin, Mary Neely  
Comment (12)

Publication Date:

1/31/2025

Citation: 90 FR 8721

**As of:** 3/4/25, 2:41 PM

**Received:** March 03, 2025

**Status:** Pending\_Post

**Tracking No.** m7t-n173-sn09

**Comments Due:** March 03, 2025

**Submission Type:** API

**Docket:** NRC-2024-0076

Holtec Decommissioning International, LLC and Holtec Palisades, LLC; Palisades Nuclear Plant; Draft Environmental Assessment and Draft Finding of No Significant Impact (retitled from 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-2024-0076-0111

Holtec Decommissioning International, LLC and Holtec Palisades, LLC; Palisades Nuclear Plant; Draft Environmental Assessment and Draft Finding of No Significant Impact

**Document:** NRC-2024-0076-DRAFT-0121

Comment on FR Doc # 2025-01997

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## Submitter Information

**Email:** deric@thebreakthrough.org

**Organization:** Breakthrough Institute

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## General Comment

See attached file(s)

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## Attachments

2025\_02\_25\_Comment\_Palisades\_EA\_FRN.docx

Breakthrough\_Institute\_Comment\_Palisades\_EA

March 3, 2025

Subject: Comment on Holtec Decommissioning International, LLC and Holtec Palisades, LLC; Palisades Nuclear Plant; Draft Environmental Assessment and Draft Finding of No Significant Impact. [Docket ID NRC–2024–0076].

The Breakthrough Institute (BTI) appreciates this opportunity to comment on the draft environmental assessment (EA) and draft Finding of No Significant Impact (FONSI) for the Palisades Nuclear Plant in Michigan, and to express our support for the NRC's findings.

BTI is an independent 501(c)(3) global research center that advocates for appropriate regulation and oversight of nuclear reactors to enable the new and continued use of safe and clean nuclear energy. BTI acts in the public interest and does not receive funding from industry.

The Palisades Nuclear Plant was initially commissioned in 1971. Its operating license was renewed in 2007 authorizing the plant to continue operations through March 24, 2031. In 2006, during the course of Palisades's application for a license extension, the NRC completed a Supplemental Environmental Impact Statement (SEIS). The plant ceased operations on May 22, 2022, but Holtec has since pursued the resumption of operations. Cessation of operations does not automatically invalidate the findings in the 2006 SEIS.

During the subsequent interval, Holtec sought to identify the changes to Palisades since the 2006 SEIS.<sup>1</sup> The NRC found that

*"Section 3.1 of the N&S Report states that a review of aerial imagery between 2006 and 2021 shows no major changes to onsite or offsite land use and that the general character of the surrounding area has remained largely the same."*

Given that the surrounding areas have undergone little changes and the operations and use of the Palisades plant would recommence similar to the manner in which it had prior to ceasing operation in 2022 under the 2006 SEIS, it is appropriate that the NRC did not require another SEIS and moved forward with the EA. Doing so is in line with the NRC's Efficiency Principle of Good Regulation.

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<sup>1</sup> Holtec's New and Significant Report (N&S Report) (Holtec 2023- TN10538)

The decision to undertake the EA has been supported by the staff's conclusion that "the potential direct, indirect, and cumulative environmental impacts from the reauthorization of power operations at Palisades would not be significant" and that a draft FONSI is warranted. BTI supports this determination.

### *Alternatives*

In addition to the EA threshold, the Fiscal Responsibility Act of 2023 amended NEPA mandating the consideration of the negative impacts where no action was taken:

*...a reasonable range of alternatives to the proposed agency action, including an analysis of any negative environmental impacts of not implementing the proposed agency action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and need of the proposal.*

Instead of considering the impacts of if construction will or won't happen on-site, this NEPA amendment requires the NRC to grapple with the broader impacts of not reauthorizing power operations at the Palisades reactor and others like it.

To its credit, the NRC identified some of the significant downsides to taking no action including but not limited to the reduction in clean baseload necessary for Michigan to reach its clean energy goal, the need for additional power plants to be built in order to replace the baseload, and the potential environmental disturbances caused by the construction of new non-nuclear power generation facilities. Restarting the Palisades power plant is equivalent to Michigan's nearly all of the wind electricity generation, or five times the generation from solar or hydroelectric.<sup>2</sup> No alternatives were "technically and economically feasible, and meet the purpose and need of the proposal." Had other generation sources been identified as a reasonable alternative, the NRC should have taken their analysis a step further by including the significant environmental and public health impacts that emissions<sup>3</sup> from new fossil fuel generation, made necessary to maintain baseload generation, would impose on their

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<sup>2</sup>Based on data from Energy Information Administration, Net Generation by State by Type of Producer by Energy Source (EIA-906, EIA-920, and EIA-923), 2021 values for Palisades as the last full operation year, the most recently available data is used for renewables.

<sup>3</sup>The NRC is equipped to do so as evidenced by Sections 3.3 and 3.11 of the draft EA and draft FONSI in which it takes into consideration the effects of reauthorizing power operations on air quality and public health. This analysis could be applied to alternatives, as well.

surrounding populations. Replacing nuclear technologies with carbon-releasing ones is detrimental to the environment and society as a whole.

The NRC correctly identifies that continuing the decommissioning of an existing reactor with the intent to build a new reactor would exceed the opportunity costs of reauthorizing power operations of the original reactor by causing significant delays, substantial costs, and additional disturbance to the surrounding environment. It further notes that replacing the nuclear reactor with another generation type would “result in substantial additional environmental impacts not needed to resume operation of the existing reactor.” It cannot be understated that the marginal impacts of such actions would outweigh the marginal benefits. The NRC agrees with this.

Given the FONSI and significant environmental benefits, in the scope of environmental review, not reauthorizing power operations would be in conflict with the NRC mandate to not unnecessarily limit benefits to society.<sup>4</sup>

BTI appreciates the opportunity to comment on this draft EA and draft FONSI. We commend the NRC’s decision to begin with the EA and their subsequent Finding of No Significant Impact. When considering viable alternatives, the NRC should take into consideration the externalities of other power generation types. BTI looks forward to continued collaboration to ensure the safe and efficient development of nuclear technology.

Sincerely,

Dr. Deric Tilson  
Senior Nuclear Analyst  
The Breakthrough Institute

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<sup>4</sup> See Section 501 of the ADVANCE Act, 2024

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