

From: [Alan Blind](#)
To: [Petition Resource](#)
Cc: [PalisadesRestartProject](#)
Subject: [External_Sender] Supplemental Filing to May 15, 2025 10 CFR 2.206 Petition – Steam Generator Tube Integrity at Palisades
Date: Tuesday, July 22, 2025 10:50:26 AM

Subject: Supplemental Filing to May 15, 2025 10 CFR 2.206 Petition – Steam Generator Tube Integrity at Palisades

Dear NRC Petition Review Board,

I respectfully request that the following supplemental information be added to the record of my May 15, 2025 petition submitted pursuant to 10 CFR § 2.206, titled *“Request for Enforcement Action Against Palisades Nuclear Plant for Violation of Technical Specification 3.4.17 Prior to Certified Shutdown, and for NRC to Require Compliance with This Condition Action Statement Before Restart.”*

As documented in that petition, I presented evidence that Entergy Nuclear Operations, Inc. violated Technical Specifications 3.4.17 and 5.5.8 by failing to perform and submit a required Operational Assessment following the 2020 Steam Generator Tube Inspection.

I further requested that, if Holtec Decommissioning International, LLC received NRC approval to reinstate the Operating Technical Specifications, it must also be required to complete a forward-looking Operational Assessment and receive a publicly docketed Safety Evaluation Report (SER) prior to re-entry into Mode 4.

I now submit a critical supplemental development that activates the second half of that petition:

“A final no significant hazards consideration determination and license amendment approving changes to the operating license and technical specifications to support the reauthorization of power operations at Palisades Nuclear Plant (Palisades) will be issued on or about July 24, 2025.”
— NRC Notification of Significant Licensing Action, July 17, 2025 (ADAMS Accession No. ML25188A013)

That amendment reinstates enforceable Technical Specifications TS 3.4.17, 5.5.8, and 5.6.8, confirming Holtec's full obligation to meet the Steam Generator Program requirements, including:

- Performance of a **Condition Monitoring Assessment** for the most recent inspection outage, and
- A **forward-looking Operational Assessment** ensuring tube integrity for the next full operating cycle.

However, as of the date of this letter, Holtec has not submitted to the NRC—and no public record exists—of either a Condition Monitoring Assessment or an Operational Assessment, both of which are required under the now-approved Technical Specifications.

Accordingly, in addition to my original allegation against Entergy, **I am formally adding a second allegation:** Holtec is not in compliance with its approved Technical Specifications due to failure to submit the required assessments prior to restart.

This claim is supported by the **NRC’s own June 30, 2025 Request for Additional Information** (ML25182A275) regarding Holtec’s Steam Generator repair license amendment request. In **RAI Question 22**, the NRC explicitly requested:

“Please provide the following reference documents on the docket:
• *Framatome Document 51-9321652-000, “Palisades Steam Generator Condition Monitoring for IR27”*
• *Framatome Condition Monitoring and Operational Assessment (CMOA) for Restart Inspection ID28”*”

The need for this request confirms that these critical assessments—required under TS 5.5.8 and 5.6.8—had not yet

been docketed, raising immediate regulatory concern.

Because Palisades employs mill-annealed Alloy 600 steam generator tubing known to degrade rapidly under stress corrosion conditions, and because Holtec's 2024 inspection data confirmed flaws exceeding 90% through-wall, the absence of a documented and NRC approved Operational Assessment poses a substantial risk to public health and safety.

In summary, I respectfully request that the Petition Review Board:

1. Add this new allegation and all referenced materials to the petition record;
2. Recognize Holtec's current noncompliance with Technical Specifications TS 3.4.17, 5.5.8, and 5.6.8;
3. Enforce the requirement that Holtec submit and docket both the Condition Monitoring and Operational Assessment documents and that the NRC publish a supporting Safety Evaluation Report (SER) **before Palisades is authorized to enter Mode 4.**

Thank you for your attention to this matter of critical safety and regulatory importance.

Sincerely,

Alan Blind

1000 West Shawnee Road

Baroda, Michigan 49101

a.alan.blind@gmail.com