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FROM: Terry J. Lodge, Esq. and Wallace Taylor, Esq., Counsel for Don't Waste Michigan, Three Mile Island Alert, Nuclear Energy Information Service, Michigan Safe Energy Future, Beyond Nuclear

SUBJECT: White Paper Analysis, "The Nuclear Regulatory Commission's Double Standard: A Historical Overview of NRC's Inspection Requirements at Millstone 1, Turkey Point, and Holtec's Palisades"

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Attached is a white paper published today by our nuclear engineer expert, Arnold Gundersen, entitled "The Nuclear Regulatory Commission's Double Standard: A Historical Overview of NRC's Inspection Requirements at Millstone 1, Turkey Point, and Holtec's Palisades." Mr. Gundersen warns that nuclear power safety regulation has been notably weakened over the past half-century, and that this change poses potentially dire consequences for the restart of Palisades Nuclear Plant.

Mr. Gundersen cites the December 2025 Framatome Operational Assessment of the plant where Holtec's engineering contractor recommends limitation of Palisades' initial cycle after restart to 14.5 months instead of the normal 18 months, to allow detailed inspection for further deterioration of the steam generator tubes. While Framatome acknowledges that the safety risk increases exponentially the longer Palisades operates, Mr. Gundersen contends that this admission is flawed because it fails to account for Survivorship Bias and may seriously underestimate the risks of continued operations at Palisades.

We're forwarding Mr. Gundersen's latest assessment to you because it is imperative that Palisades not be allowed to operate without a rigorously attained understanding of the state of those tubes. In 1972 at Millstone, even limited uncertainty about water chemistry and corrosion led the AEC, predecessor to the NRC, to demand exhaustive analysis, documented contamination pathways, and repeated shutdowns for reinspection within months of restart. At Turkey Point in the 1970s-1980s, the NRC imposed increasingly strict inspection intervals, eventually requiring shutdowns as frequently as every six months, after identifying stress corrosion cracking caused by poor water chemistry.

Yet in 2026 at Palisades, no root cause analysis has been required although systems were left without proper wet layup corrosion protection for two years, no water chemistry monitoring was conducted, no records were maintained, and more than 1,000 steam generator tubes were found to be damaged, far above historical norms. The NRC has not mandated accelerated reinspection intervals comparable to those imposed in past cases.

We urgently call for the NRC to require full chemical analysis, validated root-cause investigations, and significantly shortened inspection intervals before any restart of Palisades is permitted.

Thank you.

Sincerely,

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