

From: Shawn Connors <shawn15888@gmail.com>
Sent: Tuesday, July 7, 2026 8:47 AM
To: PioneerEnvironmental Resource
Subject: [External_Sender] Public Comment in Support of the Notice of Intent (NOI) to Initiate Scoping for an Environmental Impact Statement (EIS)

Project: Holtec Palisades Pioneer Units 1 and 2 (SMR-300) Limited Work Authorization (LWA) Application

Docket IDs: NRC-2026-0265

To Whom It May Concern:

I am writing to submit this formal statement in strong support of the U.S. Nuclear Regulatory Commission's (NRC) initiation of the environmental scoping process for the proposed Pioneer Units 1 and 2 at the Palisades Nuclear Plant property in Covert, Michigan. As a member of the public who has closely followed the regulatory milestones of this site (including the historic repowering process of the existing 800 MW reactor) I believe the addition of two Holtec SMR-300 small modular reactors represents a logical, safe, and environmentally sound next step for Michigan's energy infrastructure.

The core of my support rests on a fundamental principle of modern nuclear regulation: the proposed construction of these two advanced, smaller reactors does not materially alter or elevate the environmental or safety risk profile beyond what has already been thoroughly evaluated, accepted, and approved for this specific footprint.

1. A Proven, Vetted Nuclear Footprint

The Palisades site is an established industrial landscape that has successfully and safely hosted commercial nuclear generation for decades. The local environment, the surrounding community, and the regional transmission grid have long since adapted to the presence of a baseload nuclear asset.

When the framework to repower the existing 800 MW reactor was initiated, the environmental impacts of operating a large-scale nuclear plant at this location were subjected to rigorous re-examination. That process demonstrated that the site possesses the requisite geological stability, cooling water accessibility, and minimal ecological disruption markers required to satisfy stringent federal guidelines. Initiating the scoping process for an Environmental Impact Statement (EIS) for Pioneer Units 1 and 2 should heavily leverage this existing baseline data. The environmental footprint of adding modular units to an active, audited facility is significantly smaller than establishing a completely new site elsewhere.

2. Dismantling Claims of Incremental Danger

While public discourse around energy infrastructure understandably invites scrutiny, much of the vocal opposition to this expansion relies on systemic exaggerations and procedural legal threats designed to sway public opinion through fear. Critics frequently claim that introducing additional reactors to an

existing site multiplies the risk of a catastrophic event, threatens the local ecology, or relies on unsafe regulatory shortcuts.

These claims are fundamentally undermined by the laws of physics and the core design of Small Modular Reactor (SMR) technology. The single most powerful counter-argument to the premise that these units pose a danger to the environment or the public is the **inherent, passive safety architecture** of the SMR-300.

Traditional legacy reactors depend on active, complex electrical and mechanical systems—such as diesel generators and human intervention—to cool a reactor core during an unplanned shutdown. The SMR-300, by contrast, operates on walk-away-safe physics. It utilizes gravity, natural convection, and evaporation to achieve cooling without needing external power or operator action. Because these safety features are hardwired into the physical design, the mathematical probability of an environmental release or core damage event is orders of magnitude lower than older operational designs. Consequently, adding these two advanced units does not multiply site risk; rather, their incremental risk is entirely negligible, sitting well within the safety margins already approved for the main plant.

3. Optimized Infrastructure and the Environmental Imperative

Constructing Pioneer Units 1 and 2 on the existing Palisades property maximizes utility while minimizing environmental disruption. The site already possesses the necessary security perimeters, transmission line rights-of-way, and heavy transport infrastructure. By utilizing a Limited Work Authorization (LWA), the physical disruption remains confined to an area already designated for industrial nuclear use. No new undisturbed habitats need to be fragmented, and no new high-voltage transmission corridors need to be cleared through Michigan forests.

Furthermore, as the regional grid faces acute capacity shortfalls from fossil-fuel retirements, it requires continuous, carbon-free baseload power to anchor intermittent renewables. The 600 MW of combined clean capacity from Pioneer Units 1 and 2 will provide a steady supply of clean energy, preventing the combustion of millions of tons of fossil fuels.

Conclusion

The NRC's scoping process should reflect the reality that this project takes place on a thoroughly understood, legally permitted, and historically safe site. Because the advanced engineering of Holtec's SMR-300 ensures that these units cannot increase the baseline risk beyond what has already been approved for Palisades, the environmental review should be focused, efficient, and forward-looking. I urge the Commission to move forward diligently with the Environmental Impact Statement.

Sincerely,

Shawn Connors

South Haven, Michigan

Federal Register Notice: 91FR36015
Comment Number: 2

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