From: Jan Boudart
To: Marlayna Doell
Subject: [External_Sender] :Docket #50-225. Public Comment on Opposition to Palisades Restart
Date: Thursday, October 8, 2026 3:26:53 PM

Marlayna.Doell@nrc.gov

Re: https://www.nrc.gov/docs/ML2627/ML26275A214.pdf and
https://www.nrc.gov/docs/ML2627/ML26273A469.pdf

October 8, 2026
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001
Re: Palisades Nuclear Plant, Docket No. 50-255 — Opposition to expedited approval of
DD41 fuel recovery amendment

Dear NRC Commissioners and Staff:

I urge the NRC to proceed with caution and deliberation in responding to the fuel-rod accident at Palisades NPP around August 3, 2026. If Holtec be allowed a one-time fuel-handling amendment, what would that look like when the situation is so enigmatic?

Lay people know almost nothing of items like “transfer canisters,” “the normal underwater transfer route”, “the equipment hatch”, “the North Tilt Pit”and the spent-fuel pool. With many explanations in order, both utility and government have taken refuge in a 50-59 procedure of complete secrecy.

That the re-start schedule has been delayed again is OK because the NRC is charged with public health and safety; not conforming to a dubious schedule for restarting the plant. To prioritize the re-start schedule is putting the cart (restart schedule) before the biological horse (human, animal, plant, soil & air — environmental safety, perhaps involving evacuation advice or compulsory instructions.)

Questions:

- Is the situation being monitored with dependable and accurate radiation measurements at standard distances from the plant? If so, is the public being honestly informed about any increased radiation? — without consideration of whether Holtec or the NRC has advice regarding the possible danger.
- Is it true that Holtec stated that complete loss of canister shielding was removed from the finalized radiological consequences analysis after a drop

analysis deemed that event not to be credible? If so, did that "in"credible event take place in reality at Palisades in early August 2026?

An immediate public safety watch should have been declared in early August. Instead, either Holtec did not report the incident to the NRC — or the NRC collaborated with the company they should have been regulating — to postpone broadcast of almost all information for at least 3 weeks. This does not sit well among those of us who have been concerned about Palisades' safety and have been following Palisades events for several years. I think maybe present safety necessitates emergency authorization now. Maybe ongoing progress/safety reports to the public are more important and imminent than waiting until after careful investigation and review.

A rogue fuel rod, probably partly spent, is a danger to all — witness that fact that now special robots must be fabricated to reach the wandering rod because the situation is too dangerous for the intervention of a human body. And recall that all robotic devices for several years after the Fukushima explosions were defeated by the intense radiation in the reactor vessels. But after 25 years of great ingenuity and effort about 0.6 gram of corium was removed for examination (out of 880tons. I googled it.) I, personally, think that comparisons to the Fukushima efforts to enter a dangerous reactor vessel are very appropriate.

(This evokes the unfortunate individual who fell into the reactor vessel [water?] previous to this accident. That event, too, was glossed over.)

The event presently in question (a misplaced, partially irradiated fuel rod in the Palisades reactor vessel) is a significant abnormal event during core loading. It should trigger greater scrutiny of operational readiness — not a presumption that the licensee's own recovery calculations and timetable are sufficient. After all, the NRC is regulating Holtec — not vice-versa.

When Holtec has fabricated a contraption it believes can alleviate this situation, NRC should demand independent expert review of the lifting device, canister, rigging, load path, drop analyses, shielding assumptions, and contingency procedures. This should include experts who can evaluate drops over the North Tilt Pit, including consequences for stored fuel and spent fuel pool structural and water-retention integrity.

The NRC must disclose the basis for excluding complete shielding loss and explain how fuel integrity, radiation exposure, and stop-work criteria will be monitored.

In addition, Holtec should be held accountable for the broader restart safety record.

Conclusion

Finally and very importantly: NRC and the PRESENT EXECUTIVE in our

nation’s capital must provide a meaningful opportunity for public participation before authorizing this unusual operation.

Respectfully,

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