From: Roger Rapoport
To: Marlayna Doell
Subject: [External_Sender] Holtec Emergency Licensing Amendment Request To THe NRC
Date: Thursday, October 8, 2026 4:09:41 PM

Dear Marlayna Doell and NRC Staff:

Good afternoon.

I am responding to your short notice request for pubic input on Holtec International's request for a one time license amendment. As you know this request was only noticed on October 6 in a hard to find Mlive notice followed by NRC adding it to the website a day later.

Usually there is plenty of time adequate notice for the public to respond. The applicant's claim that they are in an emergency situation is not true.

As a journalist I have done many interviews with people who have worked at Palisades and other nuclear facilities, published articles about the plant in the Detroit Free Press, the Progressive and Counterpunch and produce the Nuclear Reactor Next Door podcast on Palisades I have spoken to experts such as the plant's former design engineering manager Alan Blind who has already submitted a petition on this mater.

I appreciate this opportunity to oppose granting an emergency license amendment.

I want the NRC to deny the emergency license amendment request and submit this complicated manner to the normal hearing review process that allows at least 45 days for

comment, followed by a hearing and NRC review. This has happened repeatedly in the past with Palisades and needs to happen again. A departure from the norm is not justified and could needlessly alarm the public.

Holtec's one of a kind fuel loading failure on August 30, was not disclosed to the public or the NRC until weeks later. Obviously there never was or is an emergency. Had this been the case both the plant owner and the NRC would have said so. The facts speak for themselves and a ruling in Holtec's favor on this application would raise more questions than it answers.

Nothing in Holtec's application indicates there is any kind of emergency. In fact emergency license amendments are not issued in this situation. They are done when an operating plant has a short term need that makes it prudent to keep the plant in operation.

As you know emergency license amendments are not granted for non operating plants. Ruling in Holtec's favor would set a dangerous precedent and potentially subject the NRC to similar emergency applications that are not emergencies. The net effect of an emergency amendment would be to cut off all public discussion of how to safely resolve the present challenges created by the full assembly loading failure.

By Holtec's own admission the failed fuel loading on August 30 is not a danger to workers or neighbors. There is also no threat to the integrity of the plant. The damaged fuel rods can certainly be stored underwater in the borated pool while Holtec and the NRC decide what to do next.

Of course emergencies are situations liked delayed arrival of a pump for an operating reactor. In that case a licensing amendments would be justifiable.

Neither Holtec or the NRC have told the public why the company needs a license amendment related to plant safety.

On the other hand Holtec's unprecedented attempt to restart fuel loading requires careful study and discussion with input from experienced experts like Alan Blind. Failure to carefully evaluate all points of view could ironically create the kind of " emergency"that Holtec and the NRC both deny is presently happening. That would be a bad outcome for all concerned.

In other words Holtec's plan needs to go through the normal 45 day comment period followed by a public hearing and a careful analysis that is the heart and soul of the NRC.

There is one other key point on the radiation exposure limits. Even if Holtec's worst case exposure calculation is correct and falls within legal limits, both workers and the public are vulnerable.

The fact that this operation can expose a worker to 60 percent of their annual radiation limit or that vented radioactive gases are "under"the legal limit does not mean that anyone wants this to actually happen. In the latter case the amount of radiation in the gases, albeit "legal" could still trigger an evacuation order.

There is something else at stake here. Holtec's rushed plan of

action could, if it fails, damages the integrity of the company's plan to reopen the reactor. That would not be in the best interest of either Holtec or the NRC.

I also want to point out that under the ownership of both Entergy and Holtec this latest proposal is preceded by a number of previous events that underscore the concerns presented in Alan Blind's outstanding petition.

In 1993, a broken fuel rod led to two emergency evacuations of all plant personnel from the containment, as a precaution against significant potential radioactive hazards, including during the recovery operation.

In 2005, a two-day dangle of a 107-ton, fully loaded highly radioactive waste container above the indoor wet storage pool was a close call with catastrophe."

From December 2024 to April 2025, Holtec undertook a large-scale transfer of highly radioactive waste from the indoor wet storage pool into outdoor dry cask storage. Holtec did so with no Radiological Emergency Plan in place, including evacuation planning for the local, area, and perhaps even regional population, if a disaster unfolded due to the drop of a heavy cask into the pool. Holtec took advantage of Palisades' then decommissioning status, a regulation-free zone, despite the inherent risks of such an operation."

None of this is reassuring. I believe it is the best interests of the public to carefully evaluate Alan Blind's petition and, given his experience, have a hearing where he, the NRC and

Holtec can openly discuss all of his questions. That will be a benefit to the plant owner, NRC staff and the public.

There is a reason why the NRC has procedures in place to make sure that the public is part of the opportunity. The applicant's claim that there is an emergency is, by its own admission, false.

I look forward to an opportunity to join a public hearing on this matter. Please confirm receipt

Sincerely,

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