From:	Michael J Keegan
To:	Marlayna Doell
Cc:	Justin Poole; mkeeganj
Subject:	[External_Sender] Palisades - PUBLIC NOTICE NRC STAFF PROPOSES A ONE-TIME AMENDMENT TO THE LICENSING BASIS FOR THE PALISADED NUCLEAR PLANT TO ADDRESS TIPPED FUEL
Date:	Thursday, October 8, 2026 4:01:29 PM

Dear Marlayna Doell,
NRC Project Manager
Operating Reactor Licensing Branch 3
Regarding: PALISADES - PUBLIC NOTICE NRC STAFF PROPOSES A ONE-TIME AMENDMENT TO THE LICENSING BASIS FOR THE PALISADED NUCLEAR PLANT TO ADDRESS TIPPED FUEL
Don't Waste Michigan goes on record in oppositon to: 1) Process of Public Notification and 2) Proposed License Amendment Request to remove the fuel bundle(s).
On 10/6/2026 at 8:20pm NRC posts at webpage a link to a Public Notice with Mlive media outlet announcing a 44 hour Comment Period to NRC about proposed LAR. The NRC did not post in ADAMS, did not post in Federal Register instead posted in obscure location in very tiny print. The Public was not noticed by design.
Don't Waste Michigan requests that Comment Period be reposted, placed in Federal Register and ADAMS and be expanded 30 days to allow adequate review of fuel load recovery. The fuel is reported as stable and monitored. Taking action now puts the Public in peril unnecessarily.
The NRC recently granted the fifth exemption to Holtec at Palisades to exceed worker fatigue requirements and work long extended hours to meet the workload. This coupled with notorious poor Quality Assurance and missing documentation has now led to this most recent fuel SNAFU. Please do review the documents below as they are contributing factors which have lead to this unprecidented empasse.
For over three weeks Holtec sat on fuel load SNAFU, for over three weeks the NRC has gone along. Now since fuel load SNAFU has been outed by social media comes this wham bam unprecidented proposal. The NRC has too much to loose by railroading the Public and stonewalling expert critique.
These are only partial comments of Don't Waste Michigan
Thank you for review and addressing these Comments before proceeding.
Please see documents below, as they will be of value to you.
Please confirm you have received my Comments
Respectfully Submitted
Michael J. Keegan
Don't Waste Michigan
mkeeganj@comcast.net
(734) 770-1441
There have been five exemptions on Worker Fatigue to date.

ML26156A017	Palisades Nuclear Plant - One-Time Exemption from the Requirements of 10 CFR 26.3(a) (EPID L-2026-LLE-0025) (L	2026-06-29 08:44 AM EST	2026-06-18	05000255

ML26156A018	Palisades Nuclear Plant - One-Time Exemption from the Requirements of 10 CFR 26.3(a) (EPID L-2026-LLE-0025) (E	2026-06-29 08:44 AM EST	2026-06-18	05000255
ML26156A019	Palisades Nuclear Plant - One-Time Exemption from the Requirements of 10 CFR 26.3(a) (EPID L-2026-LLE-0025) (F	2026-06-25 10:04 AM EST	2026-06-18	05000255

Palisades Exemption from Records Retention Package Contents (https://www.nrc.gov/docs/ML2119/ML21195A368.html Parent zip of 3 below)

- ML21195A367 - Exemption-Palisades Nuclear Plant (PNP) Record Retention-L-2021-LLE-0033 (13 page(s), 11/23/2021)
- ML21195A369 - FRN - PNP Records Retention Exemption FRN- L-2021-LLE-0033 (16 page(s), 11/23/2021)
- ML21195A372 - Palisades Nuclear Plant - Partial Exemption From Record Retention Requirements (EPID L-2021-LLE-0033) (16 page(s), 11/23/2021)
- **Palisades Simulator Inspection Report – Violation Missing QA**
- https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML24078A31