

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

References: Holtec submissions ML26273A469 (September 30, 2026) and ML26275A214 (October 2, 2026)

Dear NRC Commissioners and Staff:

I urge the NRC not to approve Holtec's proposed one-time alternative fuel-handling amendment on an expedited basis without a rigorous, independently verified safety review and meaningful public scrutiny. The recovery of damaged fuel assembly DD41 may be necessary, but the urgency of returning Palisades to commercial operation must not dictate the pace of nuclear safety decisions.

Holtec reports that DD41 tilted after release by the refueling machine during core loading, damaging its upper tie plate and preventing normal retrieval. Holtec also reports that the assembly is presently stable, under continuous camera surveillance, and subject to measures intended to prevent further movement. These statements raise a basic question: What safety necessity requires emergency authorization now, rather than allowing time for careful investigation and review?

The proposed operation is not routine. It would use a newly fabricated fuel movement device and transfer canister, lift and transport the assembly outside the normal underwater transfer route, and carry the loaded canister through the equipment hatch into the spent fuel pool building. Holtec acknowledges that this operation departs from assumptions in the plant's existing safety analysis.

The NRC's October 2 questions expose unresolved matters deserving independent attention. Holtec states that complete loss of canister shielding was removed from the finalized radiological consequences analysis after a drop analysis deemed that event not credible. The NRC should publicly explain and independently substantiate the basis for that exclusion, including the assumed drop heights, orientations, impact surfaces, and potential common-cause failures.

Holtec also confirms that the proposed heavy-load route passes over the North Tilt Pit, where spent fuel is stored. The NRC should assess potential damage to stored fuel, pool structures, and water-retaining boundaries from a credible load drop. I am not claiming that a drop would necessarily breach the pool or cause a spent fuel fire. I am asking the NRC to demonstrate, with independent analysis, which severe accident sequences are physically credible and how they are prevented or mitigated.

These concerns should be evaluated alongside other reported Palisades restart issues, including an incident involving a worker falling into the reactor vessel and Holtec's approach to steam-generator degradation. I request that the NRC verify the facts and circumstances of those events and assess whether they collectively indicate weaknesses in work planning, human performance, corrective action, management oversight, or safety culture. These other

events are concerns requiring verification; the two referenced DD41 filings do not themselves establish their details or a common cause.

Holtec has substantial experience in nuclear decommissioning and fuel management, but restarting and operating a commercial nuclear power plant requires a demonstrated operational safety culture. A significant abnormal event during core loading should trigger greater scrutiny of operational readiness—not a presumption that the licensee's own recovery calculations and timetable are sufficient.

I respectfully request that the NRC:

1. Withhold expedited authorization until the technical basis and need for emergency processing have been independently evaluated and explained.
2. Require a documented root-cause investigation of the DD41 handling event and a review of corrective actions before the recovery proceeds.
3. Obtain independent expert review of the lifting device, canister, rigging, load path, drop analyses, shielding assumptions, and contingency procedures.
4. Specifically evaluate drops over the North Tilt Pit, including consequences for stored fuel and spent fuel pool structural and water-retention integrity.
5. Disclose the basis for excluding complete shielding loss and explain how fuel integrity, radiation exposure, and stop-work criteria will be monitored.
6. Review the broader restart safety record and provide a meaningful opportunity for public participation before authorizing this unusual operation.

Holtec's September 30 filing invokes emergency processing because delay could postpone activities needed to restore power operation. That may fit a regulatory category for emergency amendments, but it does not establish an immediate public safety emergency. The NRC's mission is to protect public health and safety, not to preserve a commercial restart schedule.

When a complex operation goes wrong, the appropriate response is to investigate, independently verify the recovery plan, and proceed deliberately. Please place this comment in the public record for Docket No. 50-255 and provide a substantive response to the safety questions raised.

Respectfully,

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