

Partial Comments from Arnie Gundersen:

Dear Protectors of the Public's Health and Safety at the NRC,

WHY ARE YOU IN SUCH A RUSH TO HELP HOLTEC
RESURRECT PALISADES????

As a formerly licensed AEC Reactor Operator, I view safely loading any nuclear reactor core as a sacred duty the public entrusted me with. The repeated "one-over-M" calculations to avoid inadvertent criticality that are required as fuel is loaded have been deeply impressed into my soul.

Fuel Loading should not be trivialized as a marketing photo op, yet that is exactly what Holtec did at Palisades by filming the first eight fuel elements loaded into the Palisades core and bragging about it on their Facebook page on August 31, 2026.

: The official Palisades Energy Facebook Page posted the specific image capturing the milestone of the first eight nuclear fuel bundles entering the reactor vessel. * Facebook • Holtec Palisades

Yet as soon as Holtec turned the cameras off, they managed to drop one of the next fuel bundles. According to Reddit, **Holtec's own employees have viewed photos of the dropped fuel bundle and believe it is a "BIG uh-oh" and "the worst fuel handling fuck up I've ever seen... its ugly"**. (See below)

That Holtec widely disseminated video of its first eight successful bundle insertions trivializes the safety significance and shows a the lack of a safety conscious work environment at Palisades. Trivializing fuel load show the lack of appreciation for its safety significance and is likely the root cause of the bundle drop. Neither the NRC nor Holtec acknowledged that failure until three weeks later when the press had already identified it from Holtec's employee concerns posted on Reddit. And the photos of the bundle are still not provided to the public.

What is your rush to restart Palisades by a rookie owner, Holtec??? AT LEAST THREE ISSUES NEED TO BE ADDRESSED:

1. There is absolutely nothing on the record to explain the root cause of why and how the fuel bundle was dropped and how such an event will be avoided in the future.
2. Nor is there anything on the record to analyze what damage might have been caused when the fuel bundle fell.
3. A safety conscious workplace needs to be created, not a photo op culture.

Running a nuclear power plant should not be a photo op! I understand that both the NRC staff and Holtec staff are under pressure for their respective managements to quickly resurrect Palisades, but maintaining an adequate safety culture is not open for negotiation.

Arnie Gundersen

AEC Reactor License #OP-3014

These Comments from Alan Blind:

For your information and use. See the following and attached comment four.

I submitted a fourth public comment to the NRC today based on significant new information added to the public docket this morning.

The NRC's latest Request for Additional Information reveals that the damaged DD41 fuel assembly has significant bowing. Holtec acknowledges that placing the assembly into its specially designed Fuel Transfer Canister and lowering the lid may impose additional mechanical stresses, potentially causing further deformation and damage.

Of particular concern, Holtec relies on an assurance from its fuel vendor that the assembly can be straightened without fuel-cladding failure, but provides no supporting engineering calculations or technical justification in its publicly docketed response.

This represents a potentially new and unanalyzed failure mechanism, fundamentally different from normal fuel handling or spent-fuel container loading.

My Comment 4 challenges the NRC's preliminary finding of No Significant Hazards Consideration and calls for a full license amendment review, supported by independent engineering analysis rather than expedited approval.

Wally Taylor: Please consider whether a legal response is warranted concerning the NRC's acceptance of this supplemental comment after yesterday's public comment deadline. The NRC provided less than 24 hours for the original comment period, and this significant new technical information was not publicly docketed until today, after the deadline had passed. I believe there is a substantial procedural fairness issue in allowing the NRC to rely on newly submitted technical information without providing the public a reasonable opportunity to review and comment on it. Your assessment of the legal basis for requiring the NRC to accept and consider this supplemental comment would be appreciated.

I have forwarded my supplemental comment to the NRC. Please feel free to use or share it.

Alan

From: **Alan Blind** <a.alan.blind@gmail.com>

Date: Fri, Oct 9, 2026 at 12:11 PM

Subject: Supplemental Public Comment 4 – Palisades DD41 Recovery – Newly Identified Mechanical Failure Mechanisms (ML26281A333)

To: Marlayna Doell <Marlayna.Doell@nrc.gov>,

PalisadesRestartProject

<PalisadesRestartProject.Resource@nrc.gov>

NRC Project Manager Marlayna Doell,

Please accept the attached Supplemental Public Comment 4 concerning the NRC staff's preliminary No Significant Hazards Consideration (NSHC) determination for the proposed one-time license amendment authorizing recovery of damaged fuel assembly DD41 at the Palisades Nuclear Plant.

This submission supplements my three public comments submitted on October 8, 2026, and addresses significant new technical information contained in Holtec's second response to the NRC's Request for Additional Information (RAI), PNP 2026-055, dated October 8, 2026 (ADAMS Accession No. ML26281A333).

Although this supplemental comment is being submitted after the published deadline, I respectfully request its acceptance for two reasons:

1. The NRC provided less than 24 hours for public review and comment following its October 7 public notice.

1. Holtec's second RAI response became publicly available on October 9, after the comment period closed, preventing the public from incorporating this significant new information into timely submissions.

My supplemental comment raises three principal concerns:

1. The NRC's second RAI identifies a potential new mechanical failure mechanism involving the forced straightening of an already damaged and plastically deformed fuel assembly during closure of the Fuel Transfer Canister (FTC). This operation is fundamentally different from routine fuel handling and the established spent-fuel container loading operations described in Palisades FSAR Chapter 9.
1. Holtec acknowledges that FTC lid installation may impose axial tension and compression on damaged fuel assembly components, potentially distorting spacer-grid cells. However, its conclusion that the assembly can straighten without fuel-cladding failure relies on a fuel-vendor assessment for which no supporting engineering calculations, structural analyses, or acceptance criteria are provided in the publicly docketed response.
1. These newly identified failure mechanisms raise substantial questions concerning the adequacy of the preliminary NSHC determination, particularly under 10 CFR 50.92(c)(2). They also reinforce the need for the NRC to discontinue exigent

processing and conduct a complete license amendment review with adequate time for independent engineering evaluation and meaningful public participation.

My overriding concern remains that demonstrating acceptable radiological consequences from a postulated accident does not establish that the proposed recovery operation is adequately engineered to prevent additional fuel damage.

The newly docketed information makes this distinction particularly important. A fuel-vendor assurance, without the underlying engineering justification, should not be sufficient to support regulatory approval of this unprecedented recovery.

I respectfully request that Supplemental Comment 4 be accepted into the official licensing record, considered together with my previously submitted Comments 1, 2, and 3, and addressed before the NRC finalizes its NSHC determination or approves the proposed amendment.

Please acknowledge receipt of this supplemental submission and confirm that it will be included in the official record.

Thank you for your consideration.

Respectfully,

Alan Blind
Baroda, Michigan

From: Tim Judson <timj@nirs.org>
Sent: Thursday, October 8, 2026 4:13 PM
To: Marlayna.Doell@nrc.gov
Cc: Diane D'Arrigo <dianed@nirs.org>
Subject: Holtec Palisades Emergency License Amendment Request
for Alternative Fuel Handling Method

Dear Ms. Doell,

The Nuclear Information and Resource Service opposes the request of Holtec Palisades to bypass, on an “emergency” basis, procedures for environmental reviews, technical reviews, cost analysis, and post-accident review for a license amendment that would allow for use of an “alternative fuel handling method” following the mishandling of an irradiated fuel assembly during fuel loading several weeks ago. There is no emergency justification for the requested amendment, and NRC

should deny it. Either the fuel assembly in question is undamaged and no alternative procedure is necessary; or it is damaged and its condition should be thoroughly examined before it is loaded into the reactor.

Sincerely,

Timothy Judson

Executive Director

Nuclear Information and Resource Service

P.O. Box 8, Mount Rainier, MD, 20712

301-270-6477

timj@nirs.org

www.nirs.org

To Marlayna Doell, Project Manager, Operating Radiation Licensing
Branch 3

Marlayna.Doell@nrc.gov

Re: <https://www.nrc.gov/docs/ML2627/ML26275A214.pdf> and [https://
www.nrc.gov/docs/ML2627/ML26273A469.pdf](https://www.nrc.gov/docs/ML2627/ML26273A469.pdf)

October 7, 2026

Dear Ms Doell,

Holtec is attempting to use the existence of a RFOL (Renewed
Facility

Operating License) for the as-yet-still-retired Palisades Nuclear
Power

Plant in Michigan as an excuse to seek and obtain a waiver for the
normal procedures following an accident with significant (or
potentially

significant) consequences. Instead, they want to have an "emergency"

bypass of environmental reviews, safety reviews, cost analysis, and every normal post-accident procedure (including a complete and public analysis of why the accident happened in the first place).

The excuse for invoking an "emergency" waiver thanks to the RFOL is that

they had planned to restart by early 2027, and there's no way they can

make that deadline if they follow proper procedures. Their investors can

see that. The NRC can see that. Even the public can see that, even

though we haven't been allowed to see the pictures of the accident where

a fuel assembly tilted 30 degrees and is damaged and leaning against

the inside of the reactor pressure vessel, under at least 10 feet of water.

The accident (or incident, if you prefer to minimize it) occurred about three weeks ago, but the public only learned about it from a series of

Reddit posts someone forwarded to nuclear expert Ed Lyman a few days

ago. And suddenly Holtec wants a emergency waiver to repair an accident

they wouldn't even admit happened? Something's fishy right there!

Holtec was putting the hottest, most radioactive fuel assemblies back in

the reactor -- the ones that were in the reactor when it shut down for "good" (and I do mean good).

If the damaged fuel assembly is stable (as Holtec claims), there is no cause for alarm, and this is NOT an "emergency."

This misuse of "emergency" is made clear in section 2.4 of Holtec's application, which quotes 10 CFR 50.91(a)(5), in which the NRC refers to

“emergency situations” as those in which failure to act in a timely way would result in derating or shutdown of a nuclear power plant, or in prevention of either resumption of operation or of increase in power output up to the plant’s licensed power level.

This situation is NONE OF THOSE. There is many a slip twixt an August

2026 mistake and a planned and replanned restart now slated for "early

2027" at the earliest. There is NO sure restart date, and Holtec is

misusing this option in order to move the damaged fuel assembly to the

spent fuel pool "... utilizing different plant equipment and following a different travel path ...". In other words, untested equipment and an untested procedure. They need to be careful, not quick.

Palisades was supposed to close permanently in 2031 but it was old, relatively low-power, unreliable, expensive to operate, and not very profitable. Solar, wind, battery backup, and other renewable energy options were blowing it out of the water price-wise, and that problem continued to get worse when they decided to close early, after failing to get what would have been enormously wasteful public financing.

Holtec bought Palisades from Entergy, supposedly to decommission it

until there's nothing left but the worst part: The Spent Fuel. They would profit from this operation by draining the decommissioning fund.

But at the end, millions of pounds of spent fuel would still be left, sitting on-site in a pile that grew every day the plant was operating (and will only grow larger if Palisades ever operates again, because there is still no solution for the impossible problem of nuclear waste). All the waste will always be there, at least for the lifespan of most or even everyone alive today.

Holtec transferred all the old fuel out of the reactor, and they began demolishing the reactor — starting with reducing staff, and ending all maintenance procedures.

And they destroyed all the records of production: So now it's unknown what parts tended to fail early, what had been replaced recently... who

would need any of that after the plant was permanently closed, right?

Well, wrong on two counts, the first one being obvious in this case:

They now plan to reopen the plant but don't have any idea of what's likely to happen, and what was done about it previously, what wiring is

the oldest, what was replaced a decade ago, two decades ago, etc..

It's all guesswork now.

The second problem with not having proper records has to do with other,

similar reactors (but see note, below). While no two reactors are

identical, problems do tend to follow patterns that are easily

detectable if enough data is available. As nuclear reactor operators

attempt to move to AI-operated reactor systems, prior histories of

accidents, incidents, preventive measures and so on become the "training

data" for the AI program. But Holtec destroyed all that already. There

are numerous parts in any nuclear reactor that should have had special

cleaning if the plan was to restart after a long shut-down. This is

actually standard-procedure in the industry during long outages — but if

the plan is to never re-open the reactor, it's a waste of time and

money. Holtec NEVER wants to waste time OR money!

This emergency waiver should be denied. Holtec is NOT in any sort of

"emergency" to get Palisades operating. Rather, restarting a reactor that was never supposed to be restarted is invariably a delicate and risky process that must be done carefully, and not rushed. In fact, it's NEVER been done before! Furthermore, Holtec has never operated a reactor, never started one, and had already encountered numerous problems in this risky, foolishly-attempted restart. It's also had a lot of employee turnover.

Neither Holtec nor the NRC has determined, as far as the public can tell, how the accident came about. Is the reactor base faulty or

damaged? Was a bolt or a wrench left and NOT NOTICED before trying to

place the fuel assembly on top of it, causing the leaning? How did it happen?

What procedural, staff, training, and recording procedures failed —

including failing to inform the public (and Holtec's investors) about the event in any kind of timely manner (and pictures have still not been released)?

Furthermore, and most importantly, the chance that a "significant" incident occurs during the proposed action is dismissed by Holtec through a series of convenient assumptions. First, the worst-case scenario at the most risky step was defined as a dropped fuel assembly

causing significant damage to all fuel assemblies, releasing all the toxic (radioactive) isotopes currently held between the fuel pellets and the fuel rods. Therefore, according to Holtec's reasoning -- the current scenario is accepted as being no worse than the worst-case fuel assembly

drop accident normally considered.

Given that that MIGHT be true, it IGNORES the fact that such an accident

would be extremely expensive, time-consuming, business-crushing, and

would hardly be HEALTHY for the public, even if the actual harm was

minimal because the radiation dose to the public was reduced by HEPA

filters and physical barriers, or sent up the stack to be dispersed by the winds.

The effect of the pressure to rush because HOLTEC considers this repair

to be an "emergency" can only increase the risk of a "worst-case

scenario" which is precisely why the request should be denied. The only

emergency is that in the time it will take to properly correct this

problem and restart the reactor, its entire output could have been

replaced with solar/wind/battery systems at ZERO risk of "worst-case"

accidents needing Price-Anderson, or HEPA filters to protect the public

and the workers. There are far more and better jobs in the clean-energy

industry, where accidents risking spent nuclear fuel are impossible.

Notably, Holtec's request for an "emergency" waiver and lack of openness

smacks of wanting to cover up the true extent of the problem. Holtec is

NOT qualified to make the request, NOT qualified to restart Palisades,

not qualified to operate Palisades if they ever do get it restarted, and definitely not qualified to supply reliable reports to the public or to the NRC.

The only reason Holtec has stated for requesting an emergency change is

that " ... a delay in approval of the proposed changes would result in a delay in the resumption of activities necessary to reach the plant conditions required to restore the plant to power operation." Holtec is claiming that the tilted spent fuel assembly poses no safety hazard so the delay would only cause a financial loss. Again, not a cause for alarm and certainly NOT an "emergency."

Ace Hoffman, Carlsbad, California USA

The author has studied nuclear reactor operations for more than 50 years

as an independent researcher.

Note: Even two reactor units built at the same time right next to each other are invariably significantly different: For example, in one case the Reactor Pressure Vessel of one of a pair of reactors was installed backwards (turned 180 degrees) because the crane operators apparently thought it was going to be just like the other one, but it was a mirror image. This is the same industry that is now promoting "modular" reactors as being basically off an assembly line — and Holtec is concurrently planning to install "small modular reactors" at the Palisades site.

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Jan Boudart Comments

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,

Jan Boudart,

1132 W Lunt Ave. Apt 7D

Chicago IL 60626

my comment:

First and foremost, we need a real public comment period—60 days preferably, 30 acceptable, but certainly more than 8 days! This does not give enough time for those who know way more than I, and on whose expertise I rely, to analyze in depth and make a substantial comment.

For myself, I am very concerned after hearing about the tilted canister—it brings back memories of the whistleblower at a public hearing letting the cat out of the bag about Holtec's dropped canister at San Onofre years ago.

This is a company led by an arrogant CEO that had to pull back its proposed IPO, that has a record of cheap, unsafe operations, that was banned from government contracts based on their questionable actions with a Canadian company and lied about it to get a tax break in New Jersey—where, sadly, they are so tied into the political machine that they got away with it and got the break anyway. They seem to be unrealistically suggesting multiple small reactors at Oyster Creek, ignoring the hydrology and leaked tritiated water that would make such underground reactors virtually, possibly completely, impossible.

In short, do not give Holtec any breaks, any license modifications, hold them to the most stringent standards, as they cannot be trusted to do the right thing on their own. A closed reactor, dangerous to restart, is better served by delay than by rushing to take action.

Sally Gellert

Woodcliff Lake, N.J.

201 449 8077

Dear Marlayna Doell and NRC Staff:

Good afternoon.

I am responding to your short notice request for public 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 matter.

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 matter 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 like delayed arrival of a pump for an operating reactor. In that case a licensing amendment 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,

Roger RapoportHeartland Independent Film and Drama Forum2441
Westwood St.Muskegon, MI 49441(231) 720-0930
voicerogerdrapoport@me.com<https://heartland-iff.org/When The Rabbis Came To Town>oldheartmovie.com

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

AM
EST

[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>

Dear Marlayna Doell,

The tilting of previously irradiated fuel assembly DD41 should not result in a rush to declare a finding of no significant hazards as a basis for a solution to an unprecedented endeavor.

The stunning lack of information that has been provided to the public after more than a month and this rushed comment period for our consent, reeks of a complicit relationship with Holtec.

That Holtec has allowed this to happen is another example of their lax oversight of an operation that it has no experience in practice.

That the NRC has continuously enabled Holtec to advance to this "oops" situation is unacceptable. Now the public is expected to suspend its disbelief of Holtec's competence with no more, or very little more, information than its original press release and with about 44 hours' notice.

I do not consent to this proposal. Please allow more time to consider it and with more information about the condition of fuel assembly and the predicament that Holtec has fallen into.

Sincerely,

Daryl Davis

Ohio Green Party

216-848-6912

To Marlayna Doell, Project Manager, Operating Radiation Licensing
Branch 3 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

Dear Ms Doell,

I'm writing to express dismay at the lack of public process for the uniquely troubling drop of an irradiated fuel assembly into a reactor vessel by Holtec at Palisades.

Though I realize that Executive Order 14300 instructed NRC to essentially 'rubber stamp' any request from a nuclear corporation no matter what the situation is, the response to this particularly egregious accident must be to protect workers and the public, not to allow more hasty moves that might exacerbate the problem.

Please realize that you personally have a responsibility to morally respond to this. Holtec must not be allowed to continue to act without sensible safety measures and careful consideration of how to next deal with this problem.

The public is underwriting this travesty via the billions in Federal and state support paid to Holtec for its attempted restart of this already long unmaintained and deficient nuclear reactor. We must be kept informed and allowed to have independent experts participate in a public facing process regarding this situation. Please don't allow Holtec's rushed mismanagement to continue. This is yet another in a long string of Holtec's mistakes that can adversely affect our public health and welfare at Palisades.

Thanks for your consideration,

Mary Beth Brangan

Mary Beth Brangan Producer/Director **SOS - The San Onofre Syndrome: Nuclear Power's Legacy**
Ecological Options Network
P.O. Box 1047, Bolinas, CA 94924

415-868-1900 - office

From: Alan Blind <a.alan.blind@gmail.com>

Date: Thu, Oct 8, 2026 at 7:41 AM

Subject: Public Comments – Proposed No Significant Hazards
Consideration Determination – Palisades DD41 Recovery
(ML26273A469)

To: Marlayna Doell <Marlayna.Doell@nrc.gov>
Cc: PalisadesRestartProject
<PalisadesRestartProject.Resource@nrc.gov>

NRC Project Manager Marlayne Doell,

Please accept the attached public comments concerning the NRC staff's preliminary No Significant Hazards Consideration (NSHC) determination for the proposed one-time license amendment authorizing recovery of damaged fuel assembly DD41 at the Palisades Nuclear Plant.

This submission is in response to the NRC's request for public comments posted on the MLive Public Notifications page on October 7, 2026, with comments due by 4:15 p.m. Eastern Time (ET) on October 8, 2026.

My comments address Holtec's September 30, 2026, license amendment request (PNP 2026-052, ADAMS Accession No. ML26273A469) and raise three principal concerns:

1. The adequacy of the NRC's preliminary NSHC determination, particularly whether unresolved questions concerning the original DD41 fuel-handling event have been adequately considered in evaluating the equipment, procedures, personnel, and administrative controls proposed for this unprecedented recovery.

1. The justification for exigent processing, including whether the asserted urgency is supported by actual restart prerequisites and whether abbreviated public participation is appropriate under the circumstances.

1. The radiological consequence evaluation, including Control Room dose assumptions, potential exposure to recovery personnel, and the distinction between acceptable accident consequences and adequate accident prevention.

My overriding concern is that demonstrating compliance with bounding radiological accident-dose criteria is not equivalent to demonstrating that an accident will be adequately prevented.

Given the circumstances of the original DD41 event, I believe the NRC's final determination must explicitly address the adequacy of the accident-prevention measures relied upon for this first-of-a-kind recovery.

I respectfully request that these comments be included in the official record, considered before the NRC finalizes its NSHC determination, and addressed in the staff's evaluation of the proposed amendment.

Please acknowledge receipt of this submission.

Thank you for your consideration.

Respectfully,

Alan Blind
Baroda, Michigan

From: Kary Love
<kary_love@yahoo.com>To: marlayna.doell@nrc.gov

Date: 10/08/2026 8:53 AM EDT

Subject: To NRC: Palisades: Opposed to Restart/Tipped Fuel Rod
Assembly/Plans

Dear Ms. Doell: I reside and work within the "evacuation zone" of
Palisades Nuclear Plant. I oppose Holtec's proposed fuel rod
assembly loading plan.

Holtec International officials said that on Aug. 30 workers
were [loading fuel](#) assemblies into the reactor when one tilted and the
fuel-handling grapple machine disengaged.

As you are aware this is only the most recent "problem" encountered in this "experiment" in nuclear plant resurrection:

The fuel assembly incident is the most recent delay in Holtec's effort to restart Palisades, which could become the first U.S. nuclear plant to return to generating electricity after entering the decommissioning process.

Earlier delays in the restart were caused by [extensive repairs](#) to steam generators required after [inspectors found defects](#) in the equipment.

An NRC inspection report issued Aug. 31 cited Holtec for [other low-level violations](#) involving work done between December 2025 and March 2026. Inspectors found that Palisades failed to properly control radioactive contamination and evaluate potential internal radiation doses to workers.

The demonstrated history above supports the conclusion "systemic quality assurance shortfalls" at Palisades exist under Holtec's unprecedented attempts to "restart" the aged plant that has exceeded by many years its engineered "safety lifetime."

The NRC has documented this danger and potential damage should the "restart" continue its checkered run:

A 1982 NRC report (CRAC-II, short for Calculation of Reactor Accident Consequences, also known as the 1982 Sandia Siting Study or NUREG/CR-2239) estimated Palisades' meltdown would cause: a thousand acute radiation poisoning deaths; 7,000 radiation injuries; 10,000 latent cancer deaths; and more than \$50 billion in property damage downwind and downstream. Adjusting for inflation alone, property damage would now surmount \$175 billion in current dollar figures. And the Associated Press has warned that, given population growth near American atomic reactors like Palisades over the past several decades, a proportional increase in casualty figures would also result, given more people live, work, and recreate in harm's way. AP also cited neutron-embrittlement of the reactor pressure vessel (RPV), and risk of through-wall fracture from pressurized thermal shock, as a top example of NRC weakening safety regulations to accommodate continued operations at age-degraded reactors. NRC has admitted that Palisades, and the Point Beach Unit 2 reactor, also on Lake Michigan's shore in Wisconsin, are the two worst-embrittled RPVs in the country. Watchdogs have warned about Palisades' embrittlement for more than three decades.

Given the potential downsides to Holtec's failures to date and probable future failures given the complexity of issues facing the "restart" and the fact a nuclear plant has never been successfully resurrected, the NRC ought terminate the attempt and require closure and clean up. Thank you.

Kary Love

17344 Wood Drift Drive

West Olive, MI 49460

Please extend the deadline!

Public Notice is lacking and this process is a railroad. Time is needed to allow our Experts to weight in.

I voice objection to this bum rush.

StevenSondheim

Sierra Nuclear Free Team