March 22, 2023

Honorable Jennifer Granholm
Secretary of the U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585
Via email to The.Secretary@hq.doe.gov
Via facsimile transmission to (202) 586-4403

Dr. Kathryn Huff, Assistant Secretary
Office of Nuclear Energy, DOE
Via email only to NECommunications@nuclear.energy.gov
and Rfi-cnc@nuclear.energy.gov

Kimberly J. Petry, Ph.D.
Acting Deputy Assistant Secretary
Office of Spent Fuel and Waste Disposition, NE-8
U.S. Department of Energy
Via email only to kimberly.petry@hq.doe.gov

Ms. Suzette Olson
Via email only to olsonsm@id.doe.gov

Mr. Alden Allen
Via email only to allenar@id.doe.gov

RE: Third Request for DOE denial of certification of Palisades Nuclear Plant for DOE
Civil Nuclear Credit Program

Dear Madame Secretary Granholm:

The undersigned individuals and organizations, numbering thousands of citizens, request for the third time that the Palisades Nuclear Power Plant (“Palisades” or “PNP”), owned by Holtec International, be denied certification by the U.S. Department of Energy (DOE) to receive payments under DOE’s Civil Nuclear Credit (“CNC”) Program. DOE’s recently-issued amended “Guidance,” which was specifically rewritten to enable Holtec to apply for $1.2 Billion of taxpayer funds, is not legal under the Infrastructure Investment and Jobs Act (IIJA).
We understand that Holtec International, the current owner of Palisades, may be applying to DOE for a subsidized loan under a different law, with the intention of using funds from the IIJA to pay off the loan. We question whether such a combined transaction would be lawful under the IIJA. Even if it is, IIJA credits may not be used to support Palisades. Congress intended the IIJA to support only currently operating commercial nuclear reactors that face termination of operations for economic reasons. Palisades does not meet any criteria for eligibility.

I. The IIJA Contemplates CNC Subsidies For Operating Reactors Only

Certain specific changes appeared for the first time in the publication on March 2, 2023 of the “U.S. Department of Energy Grid Deployment Office Guidance for the Civil Nuclear Credit Program Second Award Cycle.” DOE now states that “The second award cycle clarifies that eligibility extends to nuclear reactors that are at risk of closure by the end of the four-year award period (January 1, 2024- Dec 31, 2027), including such reactors that have Ceased Operations after November 15, 2021, and does not restrict eligibility to Applicants who have publicly announced intentions to retire.” (Guidance, Summary of Changes at Sect. V) (Emphasis added). The Guidance further states:

In accordance with the discretion granted to the Secretary in 42 U.S.C. § 18753(c)(1)(A), the Secretary has determined that, for the second award cycle, an Applicant may only apply that can demonstrate that, due to economic factors, the Nuclear Reactor will close by the end of the Award Period unless it receives Credits, or has Ceased Operations after November 15, 2021, due to economic factors.

Guidance p. 14. We have reproduced the entire text of 42 U.S.C. § 18753(c)(1)(A) in the margin. Nowhere does the statute vest discretion in the Secretary of Energy to include

1 (A) In general - In order to be certified under paragraph (2)(A)(i), the owner or operator of a nuclear reactor that is projected to cease operations due to economic factors shall submit to the Secretary an application at such time, in such manner, and containing such information as the Secretary determines to be appropriate, including—

(i) information on the operating costs necessary to make the determination described in paragraph (2)(A)(ii)(I), including—

(I) the average projected annual operating loss in dollars per megawatt-hour, inclusive of the cost of operational and market risks, expected to be incurred by the nuclear reactor over the 4-year period for which credits would be allocated;

(II) any private or publicly available data with respect to current or projected bulk power market prices;

(III) out-of-market revenue streams;

(IV) operations and maintenance costs;

(V) capital costs, including fuel; and

(VI) operational and market risks;

(ii) an estimate of the potential incremental air pollutants that would result if the nuclear reactor were to cease operations;

(iii) known information on the source of produced uranium and the location where the uranium is converted, enriched, and fabricated into fuel assemblies for the nuclear reactor for the 4-year period for which credits would be allocated; and
already-closed commercial nuclear reactors in the pool of potential recipients of Civil Nuclear Credits. We submit that the IIJA clearly allows subsidy only of operating commercial nuclear reactors, and that the DOE has spun an interpretation of the IIJA in the Guidance document which effectively amends the clear intention of Congress.

Palisades permanently ended power generation activities on May 20, 2022. Its entire inventory of nuclear fuel was unloaded from the reactor core on June 10, 2022 by its former owner, Entergy. Permission to operate the reactor has been formally terminated by the U.S Nuclear Regulatory Commission (NRC). On June 13, 2022, Entergy, the then-owner of PNP, sent the NRC a letter entitled “Certifications of Permanent Cessation of Power Operations and Permanent Removal of Fuel from the Reactor Vessel.” When Entergy docketed these certifications, the PNP license issued under 10 CFR Part 50 no longer authorized operation of the reactor, nor placement or retention of fuel in the reactor vessel. In addition, PNP has been authorized since December 13, 2021 to spend money from the Palisades Decommissioning Trust Fund without notifying the NRC prior to drawing resources from it, according to the NRC. Holtec International has been spending money from the Decommissioning Trust Fund since at least late June 2022 to decommission the plant.

II. The Applicant Reactor Must Be Currently Competing In The Market

IIJA’s Civil Nuclear Credit Program, codified at 42 USC § 18753, explicitly requires that in order for a nuclear power reactor to be certified, the applicant must be “a nuclear reactor that... competes in a competitive electricity market...” 42 USC § 18753(a)(1)(A). The word “competes” refers to the present tense. Palisades is competing nowhere because its fuel is completely unloaded and permission to operate under the NRC license has formally terminated.

Throughout its history, Palisades never operated in a competitive market. During its final 15 years of operations, Palisades sold 100% of its electricity under exclusive, above-market, fixed-price, long-term power purchase agreements, via a new contract awarded in 2007 through a noncompetitive process as a term of the transfer of ownership to Entergy. Palisades closed permanently before the expiration of that contract, which ensured that the plant would never

(iv) a detailed plan to sustain operations at the conclusion of the applicable 4-year period for which credits would be allocated—
(I) without receiving additional credits; or
(II) with the receipt of additional credits of a lower amount than the credits allocated during that 4-year credit period.

2 The June 13, 2022 Certifications letter is available online at https://adamswebsearch2.nrc.gov/webSearch/main.jsp?AccessionNumber=ML22164A067
5 Holtec Decommissioning International (HDI) predicted that it would be expending DTF funds by the time the license transfer from Entergy to HDI was completed, which transfer was completed on June 28, 2022. See Entergy Nuclear Operations, Inc., Entergy Nuclear Palisades, LLC, Holtec International and Holtec Decommissioning International, LLC (Palisades Nuclear Plant and Big Rock Point Site), 95 NRC ___, CLI-22-08 at 38 (July 15, 2022).
enter a competitive marketplace. Hence by the plain language of IIJA, echoed in the DOE's original guidance, there is no way Palisades meets the requirement. Palisades cannot even meet the relaxed “interpretation” DOE adopted last summer when it attempted to make Diablo Canyon eligible for the CNC. And, to boot, none of the successive owners of Palisades (CE, Entergy, and Holtec) ever sought to extend that contract, nor did they plan to operate in a competitive market. The expiration date of the 2007 purchased power agreement (“PPA”) was well known to all parties, and the plan to retire the reactor upon expiration of the PPA was announced and approved by all relevant regulatory agencies years in advance.

III. The Applicant Reactor Must Be Operating, and Projected To Cease Operations Due to Economics

Moreover, according to 42 USC § 18753(b)(1), the Secretary is ordered to “establish a civil nuclear credit program . . . to evaluate nuclear reactors that are projected to cease operations due to economic factors. . . .” (Emphasis added). Again, there is nothing in the CNC statute that bestows any credits on already-closed reactors, and there is no wording that gives the DOE Secretary the power to warp the meaning of the statute to encompass the circumstances of Palisades’ closure.

IV. Palisades Meets No Determinative Requirements For Subsidy

The IIJA sets out factors at 42 USC § 18753(c)(2) that DOE must consider before it can certify a reactor to receive the credits. Palisades meets none of them.

A. Palisades Is Not ‘Projected to Cease Operations.’ It Is Inoperable

Subsection 18753(c)(2)(A)(ii)(l) requires the DOE Secretary to determine “that the nuclear reactor is projected to cease operations due to economic factors.” Palisades is not “projected to cease operations.” It has not been operable for more than 9 months and incapable of operating without considerable refurbishment, repair and maintenance of systems. The process of restoring PNP to the generation of electricity will require a wholly-new NRC operating license adjudication.

B. Required Pollution Measurement Bespeaks An Operating Reactor

Subsection 18753(c)(2)(A)(ii)(ll) obligates the DOE Secretary to determine “that pollutants would increase if the nuclear reactor were to cease operations and be replaced with other types of power generation.” Again, it is not speculative that Palisades might cease operations; it has.

C. The NRC Can Give No ‘Reasonable Assurance Of Palisades’ Continued Compliance With Its Current Licensing Basis

Subsection 18753(c)(2)(A)(ii)(ll)(aa) mandates that “the Nuclear Regulatory Commission has reasonable assurance that the nuclear reactor will continue to be operated in accordance with the current licensing basis as defined in section 54.3 of title 10, Code of Federal
Regulations (or successor regulations) of the nuclear reactor.” The NRC cannot provide this assurance since Palisades is closed. The phrase “current licensing basis” is a term of art\(^6\) and obviously anticipates an operating reactor. To require Palisades to “continue” to be operated in accordance with its current licensing basis is a nonsensical statutory requirement because \textit{it is not operating}. Palisades has no permission to conduct power generation operations and lacks a licensing basis that encompasses power generation.

Holtec itself just formally admitted to the NRC that “the PNP current licensing basis does not authorize operation of the reactor.”\(^7\)

\textbf{D. The NRC Cannot Reasonably Assure That Palisades Poses No Significant Safety Hazards}

Subsection 18753(c)(2)(A)(ii)(III)(bb) mandates that “the Nuclear Regulatory Commission has reasonable assurance that the nuclear reactor poses no significant safety hazards.” The NRC cannot provide the DOE Secretary with reasonable assurance that there are no significant safety hazards. To the contrary, Palisades poses significant safety hazards, whether or not the plant can ever be restored to fission operations.

Before Palisades could be restored to operate, for example, there would have to be resolution of its half-century-long plague of control rod drive mechanism (CRDM) seal leakage problems. During much of its operating life, Palisades was allowed to leak 10 gallons of radioactive water per minute through all seals on the reactor vessel. Seal failures recurred throughout the 1970’s at Palisades, then stopped for a while but have repeatedly occurred since the early 2000s. The root cause(s) of the problem have never been established. Nuclear engineer David Lochbaum stated for the Union of Concerned Scientists in 2010 that “the Palisades reactor has had a much higher seal failure rate than other reactors, particularly the other reactors with similar control rod seals.”\(^8\) Noting that the CRDM seals are a key safety feature to protect the radioactive fuel core from damage, Lochbaum decried the fact that the “fundamental cause of the recurring control rod seal leak problems at Palisades has apparently eluded detection.”\(^9\) Indeed, Palisades was permanently closed on May 20, 2022 – 11 days early – because of the latest control rod drive mechanism seal failure.\(^10\)

\(^6\) 10 C.F.R. § 54.3: \textit{Current licensing basis} (CLB) is the set of NRC requirements applicable to a specific plant and a licensee's written commitments for ensuring compliance with and operation within applicable NRC requirements and the plant-specific design basis (including all modifications and additions to such commitments over the life of the license) that are docketed and in effect.

\(^7\) Letter to the NRC, March 13, 2023, from Jean A. Fleming, Holtec International’s Vice-President of Licensing, https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23072A404


\(^9\) Lochbaum, \textit{id}.

If Palisades were restored to operations there would have to be a determination about what to do regarding the reactor vessel’s severe embrittlement. In 2006, Consumers Energy, then-owner of Palisades, cited the Palisades reactor vessel’s increasingly risky metallurgical embrittlement as a reason for its decision to sell the plant. Palisades has perennially been ranked by the NRC as having one of the most embrittled reactor vessels in the industry, one which could critically fail in the event of too-rapid heating or cooling. But new owner Holtec has apparently done nothing to understand this serious metallurgical problem. Since final fuel unloading in June 2022, Holtec has had access to at least one metal “coupon,” a piece of reactor metal which was placed inside the reactor when it was built in order to provide metallurgical evidence of the vessel’s changing condition. There has been no meaningful hard science assessment of the Palisades reactor vessel for more than 20 years nor, evidently, any known assessment of the “coupon.” Without accurate physical analysis and understanding of the state of embrittlement at Palisades, this major safety concern remains unresolved, yet it would have to be resolved if the plant were to reopen.

Restoration of Palisades to operation would also require replacement of the reactor pressure vessel head. The project was deferred indefinitely in 2006 and has never been performed. Also In 2006, then-owner Consumers Energy stated a need to replace the steam generators for the second time in Palisades’ history. Entergy did not do so during the 2007-2022 period, but they would have to be replaced at great cost before reopening could occur.

Even in its inoperable state, Palisades poses significant safety concerns regarding the onsite storage of spent nuclear fuel (SNF). In 1994, an NRC safety inspector, Dr. Ross Landsman, identified violations of the reactor’s Safe Shutdown Earthquake Evaluation in the form of subsurface stability beneath the concrete pads for the loaded nuclear waste casks that are perched on the Lake Michigan shoreline. Dr. Landsman filed a Differing Professional Opinion with the agency in an effort to prevent the loading of nuclear waste into the casks for indefinite storage on a geological base made literally of “shifting sand.” The NRC allowed the spent nuclear fuel waste to be loaded into the casks anyway. Both cask pads at Palisades violate NRC earthquake safety regulations. The older one, located nearer Lake Michigan, violates liquefaction standards, while the newer one, somewhat inland, violates amplification standards, according to Landsman.

Cask No. 4, the fourth dry storage cask (DSC) to be loaded with spent nuclear fuel at Palisades, poses dangers to public health and the environment. Weld defects were detected in the 130-ton VSC-24 cask after it was loaded in 1994. Engineers for then-owner Consumers Energy predicted that placing the thermally hot inner canister which contains the thermally hot SNF into

11 http://archives.nirs.us/reactorwatch/licensing/kampsconsbrifeinf051806.htm Also, see http://archives.nirs.us/reactorwatch/licensing/pg2.jpg
12 https://www.nrc.gov/docs/ML1310/ML13108A335.pdf, p. 5/15 of PDF, Item #4, “Which are the other most embrittled plants in the U.S.? How many PWRs will reach their screening criteria in the next 10 years?”
13 See fn. 11, supra.
14 http://www.nrc.gov/docs/ML0630/ML063060175.pdf
15 See fn. 11, supra.
16 http://www.nirs.org/reactorwatch/licensing/landsmandec.pdf
the 100 degree F. indoor storage pool water while the SNF was at 400 degrees C. (750 degrees F.) could cause a steam flash and thermal shock to container and fuel. The steam flash could expose workers to radiation doses, while the thermal shock could degrade the canister and fuel, making physical conditions even worse than they already are. They determined that the SNF could not be adequately cooled during the short window of time to cut into the storage cask and move SNF into a transfer cask. Disruption of the convection air flow needed, by design, to cool the cask’s contents would cause overheating and violate the cask’s technical specifications. Director’s Decision DD-97-1, Consumers Power Company (Palisades Nuclear Plant), 45 NRC 33, 37-38 (1997). As a result, Cask No. 4 was not opened and has been left on the storage pad at Palisades in defective condition for the ensuing 28 years. Remediation in order to move the SNF in Cask No. 4 will have to happen someday, and whenever it takes place, it will be dangerous and expensive.

V. DOE Cannot Contradict The Statutory Wording That Leaves Palisades Ineligible

DOE has some discretion under the Administrative Procedure Act to issue binding interpretations of what the agency believes its statutory obligations are, as well as what they mean. But an interpretative rule cannot be used to change the thrust of the law. An interpretative rule simply states what the administrative agency thinks the statute means and is meant to be something that "reminds" affected parties of existing duties. Citizens to Save Spencer County v. EPA, 600 F.2d 844, 876 n. 153 (D.C. Cir. 1979). If by its action the agency intends to create new law, rights or duties, the rule is properly considered to be a legislative rule. General Motors Corp. v. Ruckelshaus, 742 F.2d 1561, 1565 (D.C. Cir. 1984) (citations omitted), cert. denied, 471 U.S. 1074, 105 S.Ct. 2153, 85 L.Ed.2d 509 (1985).

The DOE’s current opinion that the IIJA allows Palisades to be subsidized goes beyond the limitations stated in the statute and creates a beneficiary which was not authorized by Congress. The DOE’s interpretation is a legislative rulemaking which requires an adequate notice and comment opportunity, but none has occurred. The DOE is confined to using its judgment only to establish how best to implement the statutory mandate but instead has read the closed Palisades reactor into the statute even though the statute addresses only operating reactors. The Guidance claims “discretion granted to the Secretary in 42 U.S.C. § 18753(c)(1)(A)” as the source of authority to make Palisades eligible for nuclear credits, but the statute mentions no such thing. DOE may not unilaterally limit the pool of applicants for this second award cycle to a reactor that has ceased operations after November 15, 2021, due to economic factors. DOE has no legislative authority for its action. The Guidance interpretation has materially changed the implications of the statute, and so it cannot stand. United Technologies Corp. v. EPA, 821 F.2d 714, 719-20 (D.C. Cir. 1987); Fertilizer Institute v. U.S.E.P.A., 935 F.2d 1303, 1308 (D.C. Cir. 1991).

Congress doesn’t typically use oblique or elliptical language to empower an agency to make a “radical or fundamental change” to a statutory scheme. MCI Telecommunications Corp. v. American Telephone & Telegraph Co., 512 U. S. 218, 229 (1994). Agencies have only those powers given to them by Congress, and “enabling legislation” is generally not an “open book to

Something more than a merely plausible textual basis for the agency action is necessary. The Secretary’s interpretation of the IJJA isn’t plausible. DOE has no “clear congressional authorization” for the power it claims. *Id.*

**VI. Conclusion: Palisades Doesn’t Qualify For CNC Credits And Certification Should Be Denied**

Palisades does not qualify for the Civil Nuclear Credit Program because it isn’t an operating nuclear power generating reactor. Congress spoke through the IJJA and made no allowance for federal monetary support to be awarded to a reactor that has already shut down. The legislative intention was to offer life support to reactors that were struggling to hang on, not those which, for a complex of reasons that may include economic considerations, have lost the race.

Please curtail all consideration of a bailout for Holtec’s Palisades Nuclear Plant under the IJJA, and deny certification for the plant to receive subsidies.

Thank you.

Sincerely,

/s/ Terry J. Lodge
Terry J. Lodge, Esq.
316 N. Michigan St., Suite 520
Toledo, OH 43604-5627
(419) 205-7084
tjlocale50@yahoo.com
Counsel for Beyond Nuclear and Don’t Waste Michigan

**ORGANIZATIONS (107)**

Keith Gunter, Board Chair
Alliance To Halt Fermi 3
Livonia, MI

Anishinaabek Caucus of the Michigan Democratic Party
Ypsilanti, MI

Julie Dye, Secretary

Janice Sevre-Duszynska
Association of Roman Catholic Women
Priests, and Baltimore
Nonviolence Center
Baltimore, MD

Bobbie Paul, Treasurer
Atlanta Grandmothers for Peace
Atlanta, GA

LuAnne Kozma, President
Ban Michigan Fracking
Charlevoix, MI

Kevin Kamps, Radioactive Waste Specialist
Beyond Nuclear
Takoma Park, MD

KT Morelli, Campaign Organizer
Breathe Free Detroit
Detroit, MI

Diane Turco, Director
Cape Downwinders
Cape Cod, MA

Gwen DuBois MD, MPH, President
Chesapeake Physicians for Social Responsibility
Baltimore, MD

Kerwin Olson, Executive Director
Citizens Action Coalition
Indianapolis, IN

Dave McCoy, Executive Director
Citizen Action New Mexico
Albuquerque, NM

Janice Brown
Citizens Alliance for a Sustainable
Englewood (CASE)
Englewood, CO

Murry DeSanto, Chairperson
Connie Beauvais, Board Member
Citizens for Alternatives to
Chemical Contamination (CACC)
LakeTownship, MI

Deb Katz, Executive Director
Citizens Awareness Network
Shelburne Falls, MA

David Hughes, President
Citizen Power, Inc.
Pittsburgh, PA

Jessie Pauline Collins, Co-Chair
Citizens’ Resistance at Fermi Two (CRAFT)
Redford, MI

Priscilla Star, Founder and Director
Coalition Against Nukes
Sag Harbor, NY

Reverend James L. Caldwell,
Founder/Director
Coalition of Community Organizations
(COCO)
Houston, TX

Michael J. Keegan, Chairperson
Coalition for a Nuclear Free Great Lakes
Monroe, MI

Kareem Scales, Co-Chair
Community Collaboration on Climate
Change (C4)
Grand Rapids, MI

Joni Arends, Executive Director
Concerned Citizens for Nuclear Safety
Santa Fe, NM

Michel Lee, Esq., Chair
Council on Intelligent Energy &
Conservation Policy (CIECP)
Scarsdale, NY
Daryl Davis, Co-Chair
Cuyahoga County Green Party
and Chair
Ohio Green Party Anti-Nuclear Organizing
Committee
Cleveland, OH

Rev. Sharon Buttry, MSW
Volunteer Facilitator
Detroit Hamtramck Coalition for Advancing
Healthy Environments
Hamtramck, MI

Stephen Brittle, President
Don't Waste Arizona
Phoenix, AZ

Alice Hirt, Co-Chair
Don't Waste Michigan
Holland, MI

Kevin Kamps
Board of Directors Member
Don't Waste Michigan-Kalamazoo Chapter
Kalamazoo, MI

Kathryn Barnes
Don't Waste Michigan-Sherwood Chapter
Sherwood, MI

Dr. Mha Atma S. Khalsa and Martha
Oaklander
Earth Action Network
Los Angeles, CA

Dee Collins, Co-Director
East Michigan Environmental Action
Council
Detroit, MI

Mary Beth Brangan, Co-Director
Ecological Options Network
Bolinas, CA

Paul Berland, Leader
Environment Matters
Chicago, IL

Linda Cataldo Modica, President
Erwin Citizens Awareness Network, Inc.
Jonesborough, TN

John E. Peck, Executive Director
Family Farm Defenders
Madison, WI

Mary Shesgreen
Fox Valley Citizens for Peace & Justice
Elgin, IL

Lora Chamberlain
Frack Free Illinois
Chicago, IL

Mike Carberry, Founding Director
Green State Solutions
Iowa City, IA

Robin Lloyd, Director
Green Valley Media
Burlington, VT

Peggy Maze Johnson, Board Member
Heart of America NW
Seattle, WA

Manna Jo Greene, Environmental Director
Hudson River Sloop Clearwater, Inc.
Beacon, NY

Barbara Beesley, Outreach Coordinator
IHM Sisters Justice, Peace & Sustainability
Office
Monroe, MI

Marilyn Elie, Organizer
Indian Point Safe Energy Coalition
Cortlandt Manor, NY
Eleanore Ablan-Owen, Co-Director
Interfaith Council for Peace & Justice
Ann Arbor, MI

Cathy Wallace, Member
Irving Impact
Irving, TX

Daniel Smith, Chairperson
Kalamazoo Nonviolent Opponents of War (KNOW)
Kalamazoo, MI

Marcia Halligan
Kickapoo Peace Circle
Viroqua, WI

Terry Miller, Chair
Lone Tree Council
Bay City, MI

Jerry Rubin, Director
Los Angeles Alliance for Survival
Santa Monica, CA

Diane Weckerle RN
Secretary of Board
Michigan Citizens for Water Conservation
Mecosta, MI

Jessica Smith
MOFFA Policy Committee Chair
Michigan Organic Food and Farm Alliance
Lansing, MI

Iris Potter, Coordinator
Michigan Safe Energy Future-Kalamazoo Chapter
Kalamazoo, MI

Kraig Schultz, Member
Michigan Safe Energy Future-Shoreline Chapter
Grand Haven, MI

Jennifer Teed, Special Projects Coordinator
Michigan Unitarian Universalist Social Justice Network
Royal Oak, MI

John J. Ropp, President/CEO
Michigan Wildlife Conservancy
Bath, MI

Mark Haim, Director
Mid-Missouri Peaceworks
Columbia, MO

Susan Gordon, Coordinator
Multicultural Alliance for a Safe Environment
Albuquerque, NM

Vina Colley, Co-Founder
National Nuclear Workers Nuclear Workers for Justice (NNWJ)
Portsmouth, OH

Ian Zabarte, Secretary
Native Community Action Council
Las Vegas, NV

Cecelia LaPointe, Executive Director
Native Justice Coalition
Manistee, MI - Anishinaabe Nation

Judy Treichel, Executive Director
Nevada Nuclear Waste Task Force
Las Vegas, NV

Lorie A. Cartwright, Trustee
New England Coalition on Nuclear Pollution, Inc.
Brattleboro VT

Lea Foushee, Environmental Justice Director
North American Water Office
Lake Elmo, MN
Ann Rogers, Board  
Northern Michigan Environmental Action Council  
Traverse City, MI

Susan Kuehn, Convenor  
Northwest Ohio Peace Coalition (NWOPC)  
Toledo, OH

David Kraft, Director  
Nuclear Energy Information Service  
Chicago, IL

Tim Judson, Executive Director  
Nuclear Information and Resource Service  
Takoma Park, MD

Felice & Jack Cohen-Joppa, Coordinators  
The Nuclear Resister  
Tucson, AZ

Glenn Carroll, Coordinator, and Joanne Sweeney, Board President  
Nuclear Watch South  
Atlanta, GA

Kelly Lundeen, Lindsay Potter and John LaForge, Co-Directors  
Nukewatch  
Luck, WI

Sally Jane Gellert  
Occupy Bergen County  
Bergen County, NJ

Patricia Marida, Coordinator, and David Hughes, Core Member  
Ohio Nuclear-Free Network  
Toledo, OH

Theresa Landrum  
Original United Citizens of Southwest  
Detroit  
Detroit, MI

Steve Leeper  
PEAC Institute  
Atlanta, GA

Martha Spiess, Chair  
Peace Action Maine  
Portland, ME

Pamela Richard  
Peace Action WI  
Milwaukee, WI

Ann Suellentrop MS RN  
Project Director  
Physicians for Social Responsibility-Kansas City  
Kansas City, KS

Denise Duffield, Associate Director  
Physicians for Social Responsibility-Los Angeles  
Los Angeles, CA

Amy Schulz, President  
Physicians for Social Responsibility - Wisconsin  
Madison, WI

Janet Azarovitz, Committee Member  
Pilgrim Legislative Advisory Coalition (PLAC)  
West Falmouth, MA

Vina Colley, President  
Portsmouth/Piketon Residents for Environmental Safety and Security (PRESS)  
McDermott, OH

Connie Hammond, Board Member  
Progressive Peace Coalition  
Columbus, OH

Ellen Thomas  
Proposition One Committee  
Tryon, NC and Washington, DC
Joe Mangano  
Radiation and Public Health Project  
Ocean City, NJ

Michael Welch  
Redwood Alliance  
Arcata, CA

Anne Craig  
Reject Raytheon AVL  
Asheville, NC

Nancy S. Vann, President  
Safe Energy Rights Group (SEnRG),  
Peekeeckskill, NY

Robert M. Gould, MD, President  
San Francisco Bay Physicians for Social Responsibility  
San Francisco, CA

Jill ZamEk, Secretary  
San Luis Obispo Mothers for Peace  
San Luis Obispo, CA

Leigh Ford, Executive Director, and Ava Traverso, Energy Program Manager  
Snake River Alliance  
Boise, ID

Cliff Tasner, President  
Southern California Chapter of Americans for Democratic Action (SoCalADA)  
Culver City, CA

Maureen K. Headington, President  
Stand Up/Save Lives Campaign  
Burr Ridge, IL

David & Anabel Dwyer  
Staats Area Concerned Citizens for Peace, Justice & the Environment  
Mackinaw City, MI

Karen Hadden, Executive Director

Sustainable Energy and Economic Development (SEED) Coalition  
Austin, TX

Marylia Kelley, Executive Director  
Tri-Valley Communities Against a Radioactive Environment (CAREs)  
Livermore, CA

Tina Volz-Bongar, Co-Organizer  
United For Clean Energy  
Peekeeckskill, NY

Debra Stolerooff, Steering Committee Chair  
Vermont Yankee Decommissioning Alliance  
Montpelier, VT

Daryl Davis, David Ellison, Chris Trepal - Administrator  
Waste Not Alliance  
Cleveland, OH

Jean Merrigan  
Women's Energy Matters  
Fairfax, CA

Joseph DeMare, Co-Chair  
Wood County, Ohio Green Party  
Bowling Green, OH

Sarah Fields, Program Director  
Uranium Watch  
Moab, UT

Brad Geyer  
Veterans for Peace Madison, Clarence Kailin, Chapter 25  
Madison, WI

Lauren Sargent and Rita Mitchell, Co-Founders,  
Washtenaw350  
Ann Arbor, MI
Charley Bowman, Chair  
Western New York Drilling Defense,  
Buffalo, NY

Judy Miner, volunteer on behalf of the  
WNPJ Board members  
Wisconsin Network for Peace and Justice  
Madison, WI

Cynthia Weehler, Co-Chair  
Concerned Citizens for Nuclear Safety  
285 Alliance  
Santa Fe, NM

191 Individuals

Eleanore Ablan-Owen, Detroit and Ann Arbor, MI

Sandra Adams, Kalamazoo, MI

Wade Adams, Kalamazoo, MI

Madelene Aguinaldo, Port Arthur, NM

Scott Ahern, Nederland, CO

Robert Alpern, Brooklyn, NY

Jeff Alson, Ann Arbor, MI

Dale Anderson, Kalamazoo, MI

Marilyn Anderson, Faber, VA

JL Angell, Rescue, CA

Barbara Antonoplos, Atlanta, GA

Ann T. Behrmann MD, Pediatrician, Madison, WI

Elizabeth Bell, San Francisco, CA

Sandra Benzeev, Chicago, IL

Kim Bergier, MI

David Bezanson, Ph.D., Santa Cruz, CA

Stephanie Bilenko, LaGrange Park, IL

Lee Blackburn, Pataskala, OH

Eugene Blesing, Kalamazoo, MI

Rebekah Blesing, Williamston, MI

Bonnie Bluestein, Chicago, IL

Karen Bonime, Albuquerque, NM

Jacques Boucher, Chambly, Québec, Canada

Jan Boudart, Chicago, IL

Charles M. Brand, Covert, MI

John Brenneman, South Bend, IN

Susan Broadhead, Black Mountain, NC

Jane Bunin, PhD, Boulder, CO

Elizabeth Burr, Saint Paul, MN

Susan Callahan, Battle Creek, MI

Tom Canning, Calabasas, CA

Karen Chadwick, Kalamazoo, MI

Vina Colley, McDermott, OH

William Collins, Mount Prospect, IL

Bill Costantino, Caledonia, MI

Ellen Costantino, Caledonia, MI

Tony Cozzucoli, Owner, Cozzucoli Music,  
Ocean Springs, MS

Anne Craig, Asheville, NC
Carolyn Croom, Austin, TX
Kay Cumbow, Brown City, MI
Marnelle Curtis, Oak Park, IL
Pam Dalitz, RN, Kalamazoo, MI
Amy Damashek, Kalamazoo, MI
Ann Darling, Easthampton, MA
Daryl Davis, Cleveland, OH
Jorge De Cecco, Ukiah, CA
Darlene DeHudy, Norton Shores, MI
Dr. Boris Dirnbach, Philadelphia, PA
Louise Dunlap, Oakland, CA
David Ellison, Architect, The D. H. Ellison Co., Cleveland, OH
Alice M. Evans, Ph.D., Waitsfield, VT
Jean Fallon
Jennifer Fassbender, Beverly Hills, MI
Carolyn Ferry, Covert, MI
Terrence Fitzgerald, MD, Baltimore, MD
Jody Flynn, Covert, MI
Tracy L. Foster, Egg Harbor Township, NJ
Beckie Garvey, Grand Rapids, MI
Kenneth Gibson, Oakland, CA
Mark M. Giese, Racine, WI
Debra Gillispie, Milwaukee, WI
Robert Gregory, NY
Kathy Gritz, Boulder, CO
Norda Gromoll, Eagle River, WI
Schuyler Gould, Brattleboro, VT
Mark Haim, Columbia, MO
Marcia Halligan, Viroqua, WI
Jana Hanka, Kalamazoo, MI
Ladislav Hanka, Kalamazoo MI
Mary Hardy, Allegan, MI
Steve Heavrin, Covert, MI
Susan Heeres, Battle Creek, MI
Richard Heeres, Battle Creek, MI
Joseph Hess, East Lansing, MI
Stephan Hewitt, Pahoa, HI
Carole Hisasue, Los Osos, CA
Christopher and Lydia Hodshire, Kalamazoo, MI
Ronald, J., Hook, Licensed Master of Social Work, Certified Group Psychotherapist, Huntington Woods, MI
Bridget Houston Hyde, Austin, TX
Darynne Jessler, Valley Village, CA
William Justis, Olympia, WA
Hedwig B. Kaufman, Monroe, MI
Martin R. Kaufman, Monroe, MI
Dillon Reed, Covert, MI
Myla Reson, Santa Barbara, CA
Sharon Richey, Fort Worth, TX
Sr. Elizabeth Riebschlaeger, ccvi, Victoria, TX
Dorah Rosen, Santa Cruz, CA
Jeremy Rossman, Union Pier, MI
Pamela Rups, Kalamazoo, MI
Kathleen Russell, Grand Rapids, MI
Gary Sachs, Brattleboro, VT
Tom Sager, Rolla, MO
Lynda Schneckloth, Buffalo, NY
Amy Schulz, Madison, WI
Amy J. Schulz, PhD, MPH, South Lyon, MI
Linda Seeley, Los Osos, CA
Gail Robin Seydel, Albuquerque, NM
Joan Seeman, Littleton, CO
Mary Shesgreen, Elgin, IL
Lynn Shoemaker, Whitewater, WI
Laura Silverman, West Nyack, NY
Linda Silversmith, Ph.D., Rockville, MD
Alice Slater, New York, NY
Jamie Sloan, Covert, MI
Daniel Smith, Portage, MI
William Kirk Snavely, Lawrence, KS
Steven Sondheim, Chicago, IL
Martha Spiess, Freeport, ME
Dave Staiger, Kalamazoo, MI
James Stamos, Saratoga, CA
Debra Stolerooff, Plainfield, VT
Ivona Swan, Kalamazoo, MI
Mark Swanson, Ann Arbor, MI
George Theodoru, Portage MI
Rita Renee Toll-DuBois, Barre, MA
Jonathan Towne, Bangor, MI
Carolyn Treadway, Lacey, WA
Roy C. Treadway, Lacey, WA
Chris Trepal, Lakewood, OH
Diane Vandiver, Bolingbrook, IL
Bradley van Guider, Ph.D., Ann Arbor, MI
Gabriella Velardi-Ward, Staten Island, NY
Louis Vitale, OFM, Oakland, CA
Jessica Vokits, Kalamazoo, MI
Terry Vollmer, Saint Louis, MO
Jeffrey Vrba, Bloomfield Hills, MI
L. Watchempino, Pueblo of Acoma, NM
Stephen J. Waters, Alamo, CA
Ineke Way, Kalamazoo, MI  
Randall Webb, Chicago, IL  
Diane Weckerle, RN, Royal Oak, MI  
Jeremy Whitmore, Port Huron, MI  
Chris Williams, Hancock, VT  
Mary Jane Williams, Orlando, FL  
Maureen and Jim Wilson, Covert, MI  
Kristin Womack, San Anselmo, CA  
Joan Yater, Alexandria, VA  
Ashley Yonker, Kalamazoo, MI  
Jill ZamEk, Arroyo Grande, CA