

Analysis by Kevin Kamps of Holtec's 7/5/22 application to DOE for CNC funding

Plain text below are quotes from Holtec's 42-page application, dated 7/5/22.

Text within brackets are thoughts, responses, commentary, and analyses from Kevin Kamps, radioactive waste specialist at Beyond Nuclear, dated 10/16/23

p.1/42 on PDF counter (title/cover page)

Resurrection

[That's a loaded word. Messianic even. But of course bringing the dead back to life could also be called zombie-ism?! The Palisades zombie reactor restart scheme.]

U.S. Civilian Nuclear Credit Program

[it's actually Civil, not Civilian. They can't even get the name of the program right?! But then again, they were really rushing.]

FEDERAL AND STATE SUPPORT TO ENABLE THE RESURRECTION OF THE PALISADES NUCLEAR GENERATION STATION

[There is it again, RESURRECTION. Federal AND STATE? Isn't this an application to the U.S. DOE? What does the state have to do with it? Well, obviously, Holtec International CEO Krishna Singh, Michigan Governor Gretchen Whitmer, and Energy Secretary Jennifer Granholm — herself a former governor, as well as attorney general, of Michigan, are in very close cahoots. And this also is a reflection of the contingencies. The State of Michigan's first \$150 million giveaway to Holtec is contingent on the federal bailouts also flowing. In that sense, the first \$150 million from the state is to grease the skids. Will it be followed by another \$150 million from the state? After all, Holtec requested \$300 million. As shown below, Holtec is seeking \$3 billion, all told, from the U.S. Department of Energy (DOE). None of this account for the lucrative power purchase agreement, recently announced, which below Holtec estimates will earn it nearly a half-billion dollars per year in revenues. So mentioning the state, even on this application to DOE, is reflective of how closely coordinated DOE, State of Michigan, and even U.S. Nuclear Regulatory Commission (NRC) undertakings to restart Palisades are. How could NRC refuse Holtec an operating license at Palisades, if \$3.3 billion of (unwitting, unwilling) public bailouts, and a half-billion dollars per year in PPA revenues, have all been approved/announced? Never mind it makes a mockery of NRC regulations. NRC is doing acrobatics to accommodate Holtec's

requests/demands. What ever happened to NRC Commissioner Crowell's points in the Feb. 2023 ExchangeMonitor interview. He said Holtec would have to start from scratch on an operating license. He wondered why restart advocates had waited till the last possible second to even bring it up in the first place.]

SUBMITTED JULY 5, 2022

[Holtec took over Palisades on Tuesday, June 28, 2022. On Tuesday, July 5, 2022, it applied to DOE for CNC (Civil Nuclear Credit program) bailout. But didn't Holtec say publicly since at least December 23, 2020, that it wanted to take over at Palisades for decommissioning purposes only? Bait and switch. Fraud. Lies. They would keep this 7/5/22 bailout application secret till September 9, 2022, more than two months later. Whitmer was complicit. In fact, Holtec blamed her. We are only doing this because the governor wants us to, they said. They didn't want to displease the governor, they said. Perhaps the Sept. 9, 2022 announcements by Holtec and Whitmer had to do with the end of the first round of CNC applications on or near this date at DOE? They were now in the clear to announce what they'd done in secret, without fear of pesky questions being asked, or a clamor of protest erupting, till the application was safely docketed and under consideration/review at DOE?]

PALISADES NUCLEAR POWER PLANT 805 MWE, IDLED MAY 20, 2022

[Is it 805 MWE? MWE is incorrect. It should be MWe, or MW(e).

Or is it 840? 810? Or 800? Do they even know? They use different figures quite often.

And what about Holtec's "vision" for 1,500 MWe at Palisades, revealed in a recent Holtec publication? Zombie reactor plus four SMRs? Even then the math doesn't work out. Are they also proposing yet another power uprate at Palisades, god forbid? Do they even know?

IDLED? Now that's a deceptive, loaded word. What spin! It was permanently shut down. It was not idled. But that's what the fight is all about now, isn't it? Idled for several long years? That's not idling. If it is, it is very wasteful in terms of gas mileage, pollution, etc. if we stick with car metaphor. As Kathy Barnes of Don't Waste Michigan responded to NRC Chairman Greg Jaczko at our May 25, 2012 meeting in South Haven when he trotted out an attempted car metaphor (Just because the warning light comes on doesn't mean you have to go straight to the shop), "But Chairman Jaczko, you can't kill a million people with your car."]

LOCATED IN COVERT MICHIGAN

[Covert is an ever more ironic name now, isn't it? They are hiding a lot — and they do have a lot to hide.]

Foreward

the recent shutdown Palisades Nuclear Generation Station

[recent? Recently. But then again, they are rushing. Their deadline to submit this application is a mere one week after taking over the plant. No wonder the application is full of misspellings, bad grammar, etc. This continues throughout the entire 42-page application. But DOE doesn't care. Don't worry, Holtec will run the reactor to the letter, very grammatically correctly. Since bad grammar and spelling is less important than the ratepayer and taxpayer robbery, as well as the risks to safety, security, health, and environment, I won't comment on every instance of bad English. It is self-evident.]

{Holtec...} offers this plant as the lead nuclear unit in the nation's quest to preserve carbon free electrical generation

[Well that's pretty heady, isn't it? Palisades is quite the symbol to the nuclear establishment and its sycophants, it seems. Boy, they've hung a lot of baggage on quite a nuclear lemon and jalopy. But to paraphrase Kathy Barnes, you can't kill a million people with your car. But what a geriatric and high-risk reactor for Holtec, the governor, and the Biden administration to hang their hats on!]

This proposal if accepted, will result in the creation of over four hundred (400) additional permanent well-paying positions including represented personnel for a total of approximately 650 full time positions

[I'm not even sure what "represented personnel" means? Are they referring to the approximately 220 workers still employed on-site, as of March 20, 2023?

400 positions, paid for by this "roughly" \$2 billion CNC bailout, means \$5 million per job. Wow, that's a lot per job. But see below — on 10/3/23, Holtec lowered jobs count to 500, not 650! Only 280 jobs restored, plus ~220 jobs currently = only 500 jobs, not 650!

But of course, all told, Holtec could be after — or is after — a grand total of \$3.3 billion for restart, as they reveal below. \$3 billion in federal bailouts, and \$300 million in state bailouts.

And on 10/3/23 at meeting with NRC, Holtec revised downward the job number to around 500 Full Time Employees, which means just 280 restored jobs.

\$3.3 billion divided by 280 restored jobs equals \$11,785,714.30 per restored job, at the zombie reactor. Wow, that's an insanely large public subsidy per job restored. Think of the opportunity costs. How many more jobs could be created in other sectors for that kind of money? Throwing good money after bad at Palisades. Nuclear white elephant.

White elephant: a possession that is useless or troublesome, especially one that is expensive to maintain or difficult to dispose of.

Certainly high-level radioactive waste is difficult to dispose of. And radioactive contamination is difficult to clean up.]

Holtec is prepared to work in good faith with both federal and state agencies to achieve the goal of placing the unit back online

[That's an odd thing to say. Whose good faith is in question here? Holtec's, or the government agencies at the federal and/or state levels? Isn't good faith assumed, usually? But perhaps Holtec is right, to raise the questions of good faith and bad faith here. In fact, with Holtec, good faith can never be assumed. Holtec's track record over years and decades shows this very clearly. Like with the more than half-century old, perpetually troubled Palisades reactor itself, it is alarming that the state and federal governments are hanging their hats on a crooked, incompetent, controversial, and at times even criminal company like Holtec, entrusting it with so much public funding.]

However, existing operations are being funded solely from the nuclear decommissioning trust fund which demands that measures continue to be taken to implement plant decommissioning.

[Existing operations? What existing operations? What does Holtec mean by that? The only authorized expenditures from the Palisades Decommissioning Trust Fund (DTF) are, obviously, decommissioning activities. But unfortunately NRC also approved waivers or exemptions at Palisades allowing for DTF expenditures on non-decommissioning activities, namely spent nuclear fuel management, as well as site restoration (glorified landscaping, with some stormwater sewers thrown in). This of course again raises our allegations that Holtec is using DTF money to pay for the zombie reactor restart effort. This is illegal. But NRC is willfully blind to it, and complicit. Holtec's language above seems to indicate it needs to appear to be doing just

enough decommissioning-like activity at Palisades to justify continued unfettered access to the DTF. But it's all an act. Holtec has admitted elsewhere in this application, as well as in other public meetings, that little to no decommissioning is taking place at Palisades. They are trying to keep the plant as close to operational ready as possible. But how in the world are they spending so very much of the DTF, so quickly, while doing little to no decommissioning?! How can NRC, and even the State of Michigan, allow this. After all, Michigander ratepayers are who paid into the DTF in the first place. Entergy didn't add a dime to the DTF between 2007 and 2022. Holtec doesn't plan to add one penny going forward, either. Holtec's drain of the DTF is certainly a betrayal of the public trust, which should be illegal. And very well may be illegal. But the cops on the beat — at NRC, at the State of Michigan — seem to be asleep. With AG Nessel's intervention at NRC calling attention to the \$200 million shortfall in the DTF, to carry out the activities described in Holtec's Dec. 23, 2020 PSDAR, being the lone exception. But we think the shortfall is more like \$500 million.]

Therefore, time is of the essence in all aspects of this proposed initiative.

[Hurry up before we get caught. Hurry up before someone catches on. Also, Holtec is using time pressure as a form of extortion. Either give us what we want, pronto, or else, I'm not joking here, we really will decommission Palisades! Holtec's spokesman said just that, in other words, at the March 20, 2023 meeting with NRC. And the sentiment has been repeated since, such as above.

Ironically though, this application was rejected by DOE, as Holtec itself made public on November 18, 2022. So that hyper rush job didn't work.

But by December 20, 2022, Holtec announced it was ready to try again. I guess they had more time to work with than they conveyed on July 5, 2022 in this application.

One out for Holtec was passage of the Inflation Reduction Act in 2022. It included DOE nuclear loan guarantee authority. Holtec is supposedly seeking a billion dollar loan guarantee, a much lower hanging fruit than the "roughly" \$2 billion CNC funding — which we have asserted for over a year, Palisades is clearly not eligible for. It is closed; CNC funding is for operational reactors. It is hard to tell how much money, from which pot at DOE, Holtec is seeking. Below, they describe \$3 billion in bailouts sought. How much from the Bipartisan Infrastructure Law CNC program? How much from the nuclear loan guarantee program established by the 2022 IRA?

At the March 20, 2023 NRC-Holtec meeting, the first (that we knew of) in the regulatory restart pathway saga of meetings, Holtec was yet again emphasizing the time sensitivity. Either give us everything we want, right away, or else, and we're so sorry to have to do this, but we will begin to actually decommission Palisades. In this way, it is similar to the shenanigans played by Exelon, threatening to close reactors for good — and end tax revenues, etc. — unless given massive bailouts, as in New York State, Illinois, etc. Our response at the time was yes, please do shut them down. Dave Kraft at NEIS in Chicago referred to these "games" as "nuclear hostage

takings.” And they worked quite well for Exelon. Exelon made off with \$10 billion in bailouts, just in NY and IL alone — it made off with yet more in other states.

At Palisades alone, Holtec is looking to get away with a grand total of \$10.7 billion in bailouts, counting both the zombie reactor restart (\$3.3 billion), and the \$7.4 billion from DOE for SMR 4 new builds at the Palisades site. This \$10.7 billion figure does not include the PPA revenues, which Holtec estimates will gross it more than \$400 million per year. By gouging ratepayers up to 57% above market rates — after all, Holtec below, intends to emulate the 2007-2022 PPA as closely as possible.]

Strictly speaking, this application is non-conforming because we acquired this plant only 5 business days ago before the due date (July 5) and much of the prior operating information on the plant is not yet available to us.

[Well, at least they’re honest, for once — behind closed doors with DOE, any way. Of course, Holtec’s current CNC application is also non-conforming, as are DOE’s revised CNC eligibility guidelines — CNC was meant by Congress to bailout old, OPERATING, uneconomic reactors. Palisades is not operating, it is closed. We’ve communicated this in en masse coalition to DOE three separate times now, beginning in Sept. 2022.

It’s absurd this Hail Mary pass. NRC Commissioner Crowell said so himself in the Feb. 2023 ExchangeMonitor article. If advocates for Palisades restart were serious, why did they wait till the last second to even bring it up? Entergy had communicated shutdown plans as early as early Dec. 2016, planning shutdown by Oct. 2018. Energy changed its mind in 2017, and extended operations till May 31, 2022. So everyone had several long years to prepare for shutdown, or propose continued operations. Whitmer was the first to float the restart trial balloon, in mid-April, 2022 — at least publicly. See Detroit News coverage by Carol Thompson.

Holtec would not go public with restart plans until Sept. 9, 2022. Why would they wait till the last second like this? Are they that incompetent and disorganized? Do we want people who are this incompetent and disorganized operating perhaps the single most dangerous atomic reactor in the country if not the world, at least in terms of embrittlement risks, not to mention so many other risks?!

Also, compare Holtec’s begging tone with a student turning in a term paper that is really very half-baked, but begging for mercy from the teacher. The dog ate my homework, and I did my very best, in good faith, to turn something in, no matter how half-baked. Please have mercy on me!

Holtec’s admission above is that this application is very incomplete, at best. This may be part of why DOE rejected it on Nov. 18, 2022. That, and perhaps also the multiple coalition letters we

sent DOE, pointing out that Palisades is not eligible for CNC funding, that this would violate the Bipartisan Infrastructure Law's plain language and intent.]

However, we have made a good faith effort to provide all available information in compliance with the instructions in the DOE's website.

[Holtec sure wants readers to know it is acting in good faith. Cue Lady Macbeth: Methinks she doth protest too much.]

HOLTEC GOVERNMENT SERVICES

[Note letterhead. Why isn't Holtec Decommissioning International letterhead used? So Holtec Government Services used Holtec International funds to prepare this application? No HDI, that is Palisades DTF money was used? But above, Holtec said that is where all funding for all operations is coming from, the Palisades DTF. Which is illegal. Something is rotten in Denmark. I smell a rat. We're just supposed to trust them? NRC certainly isn't protecting the DTF.]

"Page 1 of 42" (P.3/42 on PDF counter)

Section A

Introduction

Palisades had ceased operation on May 20, 2022, after operating for 50 years.

[More than 51 years actually. It fired up in March 1971 if memory serves. But while industry may brag about a 51-year old reactor, we fear its age-related breakdown-phase risks. At Palisades, very long-neglected breakdown-phase risks.]

The acquisition of Palisades raises the number of nuclear units in Holtec's decommissioning fleet to six reactors on four nuclear sites which is the largest shutdown fleet in the United States. The company is proud to have established a successful decommissioning program that leads the industry in every key metric such as personnel and environmental safety, OSHA & NRC compliance, control of contamination, used fuel sequestration and the like, and expects

to continue its record-setting performance in the Palisades decommissioning program.

[Holtec is very proud. But check out the following whopper of an admission!]

Despite the success in decommissioning, *we are not loath to admit that we are unabashed promoters of nuclear energy, and our core corporate aspiration lies in providing clean nuclear energy to help decarbonize the global environment. In fact, one of the principal reasons Holtec has been acquiring aging nuclear plants is because such sites are near-perfect locations for building the SMR-160 reactors that the company has been developing for over a decade.*

{Emphasis and yellow highlight added}

[Okay, well that is quite a remarkable revelation.

I guess those watching Holtec's behavior could well have connected these dots before now. Holtec floated building one or more SMRs at Oyster Creek, NJ years ago. Holtec floated building one or more SMRs at Palisades in early to mid-April 2022. Holtec floated building one or more SMRs at Big Rock Point later in 2022. Holtec CEO Krishna Singh attempted to joke that even mentioning the idea of building SMRs at Pilgrim, MA or Indian Point, NY would get him hung in effigy, in an April 2022 ExchangeMonitor article. But it seems that concerned residents near Pilgrim and Indian Point — and any other nuclear power plant Holtec acquires, supposedly for “decommissioning purposes only,” had better keep their guard up. Banking sites for future SMR new builds is Holtec's actual, ulterior, hidden motivation for obtaining these closed nuclear power plants, it has now admitted.

Of course, at Palisades, Holtec is also trying to set the precedent of bringing dead reactors back to life — that is, operating zombie reactors. So that is another worry for concerned residents — will Holtec try to turn their dead reactor into a zombie reactor as well? Any supposedly closed reactor in decommissioning phase, but not actually decommissioned, or not decommissioned very much yet, would be able to emulate Holtec's zombie reactor precedent.

If Holtec is so proud of its pro-nuclear stance, and its SMR-160 design and new build aspirations, why is it so deceptive, and secretive, re: the actual reason it is acquiring closed reactors?

That good faith/bad faith question Holtec raised above comes to mind.

Of course, it appears that Holtec's “core corporate aspiration” is actually greed, but getting there through SMR new builds, zombie reactors, and looting DTFs, will suffice.

As big a deal as the zombie reactor restart at Palisades is — the unprecedented nature, the up to

\$3.3 billion in taxpayer bailout money (much more than that, when the PPA gouge is accounted for), the off the charts breakdown phase safety risks, etc. — the SMR new build scheme is an even bigger deal: \$7.4 billion in federal taxpayer bailouts; unproven design with break-in phase risks like at Chernobyl 4, Three Mile Island 2, Fermi 1, etc.; potential for domino effect multiple meltdowns, as at Fukushima Daiichi Units 1, 2, and 3, not to mention the explosion and near-miss pool fire at Unit 4.]

The United States Government's interest in resurrecting Palisades is, therefore, aligned with Holtec's corporate mission

[Holtec is correct — President Biden and Energy Secretary Granholm do have a lot to answer for here.

Another question — does the Biden administration think getting in bed with such a crooked company as Holtec a wise move, in its pro-nuclear power advocacy? They couldn't find a company that does not engage in bribery, and fraud, to partner with?]

In light of the formidable challenges that stand in the way of the renaissance of Palisades, the enormous might and resources of the federal government and an equally committed support from the State of Michigan will be essential to achieve success in restarting Palisades

[Renaissance? RELAPSE! Enormous might and resources...NRC license rubber-stamps, despite unprecedented closed reactor restart; \$3 billion from DOE, as laid out below; \$300 million from State of Michigan; state-facilitated and approved PPA, worth more than \$400 million to Holtec annually, a gouge of up to 57% above market rates on ratepayers, yet again; advocacy at the highest levels of government, Energy Secretary, governor — what's that worth to Holtec in terms of PR?

What a great country to do nuclear business in! At the high expense, and grave peril, of the public.]

In what follows, the challenges to Palisades' revival and the level of financial support from the DOE and the State needed to overcome them are summarized in this document to align to the requirements of the Civil Nuclear Credit Program's Guidance Submission Checklists.

[It's interesting that this application by Holtec (dated July 5, 2022) was rejected by DOE just over four months later (by Nov. 18, 2022). But then a month after that, Holtec doubled down, and announced it would try again.

DOE, a few months later, revised its CNC eligibility guidelines, in a blatant effort to make Palisades eligible. We pointed out in coalition to the Energy Secretary that DOE's revised guidelines were themselves illegal. CNC was intended by Congress for OPERATING reactors — Palisades is a CLOSED reactor.]

As evidence to our support for restarting Palisades, we should observe that even though Palisades is now technically in the decommissioning phase, we are deferring any activity that would make its restart irreversible or more costly. We will maintain this posture voluntarily for as long as we can hold out, perhaps for three months, because the deferral of decommissioning activities directly increases our unrecoverable project costs and after 90 days, we may lose access to the decommissioning funds to resume work.

{Yellow highlight added}

[This is a very loaded and revealing passage. Decommissioning is a bait and switch trick. Which makes Holtec a con man, playing a con game. Zombie reactor restart is really what is afoot. And yet the DTF is being drained down at a high rate of speed. How is this legal?

Three months of course has long since passed — July 5 to October 5, 2022.

Yet on March 20, 2023 — more than ten months after these words were written by Holtec to DOE — Holtec's stated policy remained the same, treading water, not doing any actual decommissioning work that was not easily reversible. See the March 20, 2023 NRC-Holtec meeting recording and transcript.

So this begs the question, how did Holtec spend down \$44 million from the DTF, just between June 28 and Dec. 31, 2022? This figure was reported by Holtec to NRC in a March 31, 2023 document.

That amounts to \$8,800,000 per month of DTF expenditure. At that rate, the less than \$500 million DTF would be entirely spent in just 4 years and 8 months. (This, however, does not account for growth of the DTF, as via interest earned on savings, or returns earned on investments, etc.) Even though little to no decommissioning work is actually taking place. But who is to say the rate of expenditure hasn't increased since Jan. 1, 2023? When is the next such expenditure report due, 2024 or not till 2025? Below, Holtec says it is a bi-annual report, so that would not be until March 31, 2025.

Yes, Holtec had permission from NRC to spend DTF money on spent nuclear fuel management. However, little to no spent nuclear fuel has been moved from the storage pool to dry cask storage as of yet — exacerbating risks of a spent nuclear fuel storage pool catastrophic fire, by the way.

Yes, Holtec has permission from NRC to spend DTF money on site restoration — glorified landscaping, with stormwater sewers thrown in. But why would Holtec do any site restoration, when they do not plan to decommission until many decades from now, if ever? That site

restoration would be very temporary, and very wasteful, since they would mess up the site again, with zombie reactor operation, as well as construction/operation at the 4 SMR new builds.

After all, Holtec plans to operate the zombie reactor for at least 20 more years, if not 25 more years, if not for much longer than that.

And any SMR new build reactors would likewise be licensed to operate for at least 40 years into the future, if not 60, 80, or even 100 years into the future.

Yes, such future decades of reactor operations mean a lot more spent nuclear fuel to manage, that whole time. So Palisades' current DTF, thanks to the flippant NRC waiver/exemption, could mean all remaining DTF money is simply entirely spent on spent nuclear fuel management. Leaving nothing for facilities dismantlement, radioactive contamination clean up, site restoration, etc. Ratepayers and/or taxpayers could well get gouged all over again, to fund new DTFs, to pay for all those messes Holtec plans to make in the future. Only the public is being told none of this. They are being told the opposite by the likes of Holtec and NRC — that the DTF is sufficient to cover everything, and then some. Because no clean up is planned?!

MI AG Nessel does not agree — she alleges that even the current reactor's DTF, vis a vis Holtec's PSDAR (Post-Shutdown Decommissioning Activities Report, dated Dec. 23, 2020), is \$200 million short.

Let alone future operations (contamination, waste generation, etc.) at the zombie reactor. Let alone future operations at the four new build SMRs.

Holtec is clearly playing fast and loose with the Palisades DTF. And NRC is letting it do so.

Gov. Whitmer seems to not care at all about any of this. As Los Alamos whistleblower Ed Grothus said on Hiroshima Day, 1992, at a commemoration at the nuclear weapons laboratory and manufacturing facility, nuclear waste is not sexy, new bomb designs, testing, manufacture, and deployment, are sexy. The same with commercial radioactive waste and contamination — not sexy at all. But restarting old reactors, and building new reactors, now that's sexy. Never mind the waste and contamination.

But as Winona LaDuke has said, the first rule in kindergarten is, you have to clean up your last mess, before you're allowed to make a new mess.

Proposing zombie reactor restarts, and SMR new builds, at Palisades, means the radioactive mess never has to be thought about, or dealt with. What a cursed legacy to leave future generations. How irresponsible. The denial is deep.]

...after 90 days, we may lose access to the decommissioning funds to resume work.

[An interesting line. How so? Why is that? Because Holtec planned to blow through the entire DTF in 90 days, leaving nothing to actually do decommissioning work with? Or was Holtec just creating a made up deadline (like its made up finances, as alleged by fired Holtec CFO Kevin O'Rourke in his whistleblower lawsuit filed in June 2023?)

Holtec did blow through \$44 million of DTF in just five months. Has Holtec kept up that alarming rate of spending? Spending on what? Certainly not decommissioning. They've done little to none. A Holtec spokesman at the March 20, 2023 meeting with NRC admitted that the only decommissioning work done since June 28, 2022 was minor modifications on the mechanical draft cooling towers, easily reversible.

As of June 28, 2022, \$487 million remained in the Palisades DTF. Thus, \$44 million spent by Dec. 31, 2022, was a whopping 9% of the total! In just five months, accomplishing little to no decommissioning. Holtec repeated at the Oct. 3, 2023 meeting with NRC that little to no decommissioning work has been performed.

So was this just another threat above? DOE and State of Michigan, give us the money, or else we'll just have to actually decommission Palisades, and your restart hopes will be dashed?

Holtec repeated such threats at the March 20, 2023 meeting.]

We are motivated to make this application because it would represent our country's first effort to stop the destruction of our nuclear generation base by a combined action of the host state and the federal government.

[There had been a record breaking number of atomic reactor shutdowns in the US, and Canada, beginning in 2013. Holtec, DOE, NRC, and Democratic leadership — Biden, Granholm, Whitmer, Newsom, etc. — seem intent on slamming the brakes on reactor shutdowns, no matter how much it costs taxpayers and ratepayers, and no matter the safety, security, health, and environmental risks to Americans. And no matter the 180-degree hypocrisy, in Newsom's case. He was at the table for the 2016 shutdown agreement at Diablo Canyon.

Of course, Holtec is being a bit hyperbolic here.

Exelon has been getting away with such murder at the state level since 2016.

Exelon threatened to shut several upstate NY reactors on Lake Ontario in 2016, unless bailed out by the state. Cuomo dutifully obliged. \$7.3 billion, that should have funded renewables, efficiency, and storage, went instead to geriatric, age-degraded atomic reactors.

Exelon similarly threatened to close several reactors in IL, beginning in 2016. Up till now,

Exelon has laughed all the way to the bank with \$3 billion in “Save the Nukes” bailouts, compliments of unwitting IL ratepayers and/or taxpayers.

Exelon has gotten away with more than \$10 billion in “Save the Nukes” bailouts in just those two states in just the past seven years. It has gotten away with yet more, in additional states.

So Holtec may think it’s first in saving nukes, but Exelon has it beat by seven years or more. Sickeningly.

Note that in NY, these bailouts were also orchestrated by a Democratic governor — Cuomo. Apparently in a raw political tit for tat — close Indian Point, and the four upstate reactors will be bailed out, massively.

While a Republican governor presided over the initial 2016 bailouts in IL, Pritzker presided over the second round in 2021.

Shame on the Democrats — Cuomo, Pritzker, Newsom, Whitmer, Granholm, Biden. Apparently, they want to stay on the good side of the nuclear power industry lobbying and campaign contribution juggernaut, the risks and costs to the public be damned.]

If successful, this project will reverberate across the countries that have (imprudently) closed their nuclear generation capacity and made themselves more vulnerable to blackmail from a country bent on using its fossil fuel exports as an instrument of coercion.

[First of all, Holtec and the government of Ukraine are close partners. Holtec already had the contract for managing not only Chornobyl’s high-level radioactive waste, but also that at most or all of the rest of the country’s nuclear power plants, even before the 2022 Russian invasion began. Holtec’s incompetence at best, corruption at worst, at Chornobyl meant spent nuclear fuel was still in vulnerable pools, at risk of loss of cooling and catastrophic fires. The spent nuclear fuel should have been out of the pools and into dry cask storage years before the invasion began. That is Holtec’s fault. Yet again, sheer luck is to thank for catastrophe not unfolding, yet again another time, at Chornobyl.

Also, Holtec and the government of Ukraine have agreed to build 20 Holtec SMRs in Ukraine. Brilliant idea — to add to the nuclear risk terrorizing the world at present, by adding 20 more radioactive targets — dirty bombs of immense size — into this active combat zone. Great idea.

Holtec implies Germany. Holtec sees Palisades as an international precedent.

Dr. Kathryn Huff at DOE Office of Nuclear Energy has also spoken of Russia “weaponizing natural gas,” since May 2022, if not earlier. It seems Holtec and DOE read from the same song book. But then again, she also spoke at Holtec’s annual meeting in a recent year.]

As the Federal and State of Michigan authorities are aware the nuclear operators are most enthusiastic about restarting the Palisades plant but are reluctant to engage themselves to the project at this stage because of the perceived risk of disfavor from the equity markets that their involvement in a financially uncertain first-of-a-kind project may elicit.

[So “nuclear operators” are gung ho, but cautious, because this is unprecedented? But Holtec is crazy enough to just proceed full steam ahead?!

So much for free-market capitalism, eh? But the risks are much greater than financial. The risks are to health, safety, security, and the environment.

Restarting Palisades risks a Chernobyl or Fukushima-scale catastrophe on the shoreline of Lake Michigan, upwind and upstream of the entire State of Michigan.

When Gov. Whitmer said — on Sept. 9, 2022 and more recently — of Michiganders that we can do, that just because this has never been done before doesn’t mean we can’t do it, perhaps there is a good reason closed reactors have never been restarted. It’s too damn risky. But she is willfully blind to the risks. Ed Lyman of UCS has referred to Gov. Whitmer’s restart push as “mindless advocacy,” in that she has no idea how high the risks are — no one has checked the status of the safety-significant systems, structures, and components.]

Holtec, as a privately owned company, is not beholden to the equity markets but is still subject to the goodwill of the banks, insurance companies, our customers and other counterparties whose continued confidence in our future stability undergirds their support to our operations.

[Holtec talks so confidently and big. But they sure are dependent on the largesse of unwitting taxpayers and ratepayers, aren’t they?!

And why did Holtec — as alleged by fired CFO turned whistleblower Kevin O’Rourke — have to inflate its revenues by a billion dollars in order to secure Hyundai’s investment partnership on SMR new build? How is this not fraud? See fired Holtec CFO whistleblower protection lawsuit allegations.

Speaking of “confidence,” how is Holtec not a confidence man? How is the Palisades reactor restart, and SMR new build, schemes not confidence games?]

These counterparties expect that we do not take excessive risk and make unsustainable commitments.

[What about expected losses of \$750 million at the New Mexico Consolidated Interim Storage Facility in the first five years? Why has Holtec hidden this information from Hyundai, the State of NM, etc.? What about Holtec's near-miss catastrophe with the high-level waste at Chernobyl — still in vulnerable pools instead of more secure dry cask storage, the transfer years behind schedule, long enough for the Russian invasion to impact Chernobyl, and its vulnerable high-level radioactive wastes? The list goes on.]

In this proposal request, therefore, we make a well-considered offer that we consider to be achievable, albeit with a strong corporate effort and an all-out-support from the federal and state governments, and one that our counterparties would not perceive to be reckless.

[But it is reckless. Very much so. It is putting the Great Lakes at risk. It is putting in peril all those who live downwind, downstream, up the food chain, and down the generations. There are few undertakings that could prove more reckless than restarting Palisades, and adding four additional reactors on the site. Both extreme ends of the risk spectrum, co-located. Breakdown phase risks and break-in phase risks, combined.]

It warrants observing that DOE's drive to revive Palisades has already had a far-reaching effect on the nuclear power industry: the baleful talk of shutting down dozens more nuclear plants has already subsided and even a plant until recently scorned by the activists, is receiving support for continued operation.

[So it is *DOE's* drive to revive Palisades? It is not Whitmer's? It is not Holtec's? It is Granholm's? There is a ring of truth to this. Granholm was the first to float keeping Diablo Canyon operational, even months before Newsom dared join that bandwagon.

Not even Entergy, which was well placed to do so, is crazy enough to engage in this kind of risk taking, it would appear from its exit.

Oh, but we *still* scorn it. Very much so.]

Successfully reviving Palisades, however, would be an unprecedented achievement that would not only...

[Unprecedented achievement? Or risk taking?! Sailing ever deeper into uncharted risk territory... there be dragons...there be monsters...Residents of Palisades Park, in the resort community's centenary yearbook, referred to Palisades as "The Monster Up the Beach."]

“Page 2 of 42” (P.4/42 on PDF counter)

...rescue a proven clean energy generator for Michigan from demise, but it would re-energize the fledgling nuclear operators in Western Europe where the move to shutter nuclear plants has been even more pernicious than the US.

[So not only a national precedent, but a global precedent. Taking digs at Germany, and even France — France’s popular referendum more than a decade ago now demanded an even larger nuclear power phase out than Germany’s, given how many reactors France has. Per WISE/Paris presentation in NIRS conference room, more than a decade ago now.]

The above said, Palisades’ revival is an arduous undertaking which will call upon an unprecedented resolve on the part of DOE, the State of Michigan and the USNRC that mirrors our own commitment to this cause.

[Unprecedented risk taking, and acrobatic maneuvers, and high wire acts, by not just Holtec, but also DOE, the State of MI, and NRC.

Ed Lyman at UCS has called the state’s advocacy for reactor restart “mindless”.

Our version of that, given the zombie reactor theme, has been, “What, have zombies eaten your brain?!”

Gov. Whitmer bragged that just because it hasn’t been done before doesn’t mean Michiganders can’t pull it off — see her Sept. 9, 2022 statement, and later ones.

But as the Rev. Dr. Martin Luther King, Jr., once sermonized, there is such a thing as healthy fear. It is what keeps us out of danger.

Holtec CEO Krishna Singh has bragged — public version — that although unprecedented, the hurdles yet to clear for restart are quite straightforward and surmountable. He made such a statement recently, when the PPA was announced.

Others of course have said they are insurmountable — see MPSC staff commentary in 967-page FOIA response.

One should be careful when sailing into uncharted waters. Especially when the risks to health, safety, security, environment, and pocketbooks are so potentially catastrophic.

Fermi 1 was also unprecedented, trailblazing, so to speak. But we almost lost Detroit. And perhaps Toledo, the Great Lakes, etc. For more info., see John G. Fuller’s book (1975) and Gil Scott-Heron’s song (1977) of the same title.

Cite my response to Singh's floating of SMR new build balloon at Palisades:
<<https://beyondnuclear.org/lte-in-the-h-p-re-smrs-at-palisades/>>]

To fix ideas, it is worthwhile to synopsise each party's challenge in short paragraphs:

[“[F]ix ideas”? Who is calling the shots here, Holtec? I would not be surprised if they are. But at one point Holtec seems to indicate this is all Granholm's idea. At another point (mid-Sept. 2022), we heard through the grapevine from the highest levels of Holtec's pecking order, that they were doing this just to please — or to not displease — Whitmer, who really wanted this to happen. So let's call it even and place blame equally with Singh, Granholm, and Whitmer. Who knows where/with whom this insane idea all began. But they each are all in, and have been for some time now.]

(i) State of Michigan (“State”): The State needs to be the first mover to provide a start-up capital to get the project moving forward without further delay. The State also needs to secure a PPA for palisades {sic, Palisades} to enable it to produce power reliably for 20 years without being buffeted by the vagaries of the merchant power generation.

[The vagaries of the (sic) merchant power generation?

Is that also called competitive free market capitalism? Of course, nuclear power could never have made it at all without massive, unprecedented subsidies. Palisades' restart and SMR new build would take that already extreme subsidization to another level entirely.

The state *has been* the first mover, unfortunately. The PPA has been announced, although little to no transparency of terms has been provided, in terms of rates, duration, etc.

The state has already forked over \$150 million, and per Jeff Alson's interpretation, perhaps \$300 million, as Holtec has requested. Of course the state could yet give more, and quickly, as happened the first go round.

But the state largesse was contingent on DOE largesse first. DOE will likely point to state largesse as the reason why it is acting. So skids have been greased. Each contingency is used to leverage the others. They are all jumping off the cliff together, holding hands. A leap of (blind) faith that puts us all at risk.

Holtec states 20 years. Of course, as always, its math is suspect. Palisades has the 60-year license out to 2031, if its operating license is restored by NRC complicity. So that's 6 years of operations if restart is in 2025 — and Holtec just repeated its target date of August 2025, at the meeting with

NRC on Oct. 3, 2023. So Holtec's saying 14 years beyond that? Of course, NRC grants 20-year license extensions. Although Holtec will likely seek 2022 to 2025 credit for not having operated during those three years, even though degradation proceeded — especially with steam generators, turbine generator shaft, pumps, etc. As always, operating license duration dates are played with fast and loose.

Palisades was given credit for 1967 to 1971 construction phase. Thus, 2007 to 2011 license extension was granted lickety split, easy peasy.

The 2011 to 2031 extension was granted despite our best efforts.

80 year — and even 100 year — licenses are soon to start being handed out again like cotton candy, as well, despite best efforts to the contrary.]

(ii)

USDOE: Two offices of the DOE will need to help us secure uninterrupted funding for the Project, as follows:

(a) NE: NE's commitment to award the grant (roughly 2 billion dollars) in early 2024 is an indispensable predicate. In 2024, we expect the project to be substantially completed which means most of the required funds will have been expended. Re-start is expected to occur by mid-2024).

(b) LPO: We count on a bridge loan from the LPO to fund the project starting later this year when the State's funding of \$300 million will have been exhausted. The bridge loan will be paid off by the grant received from NE

[Holtec sure is demanding when it comes to federal — and state — taxpayer money, eh? But Secretary Granholm, Dr. Huff (head of DOE Office of Nuclear Energy, Gov. Whitmer, et al. seem all too happy to dole it out.

Other peoples' money.

(By the way, it was highly unusual for Mr. Shah, head of the DOE Loans Programs Office, and others from DOE, to attend the Oct. 3, 2023 Holtec-NRC meeting. Why were they there? NRC is supposed to be a safety regulator. Why were there promoters in the room/at the table, from DOE?)

This seems to provide further evidence the fix is in. When Holtec says to fix ideas, they mean the fix is in.

Although this is all now delayed, because DOE rejected this application dated 7/5/22, as Holtec announced on Nov. 18, 2022, it seems that Holtec didn't really mean those do or die deadlines it was put forth as extortion to force DOE, State of MI, NRC, etc., to act by date certain. They simply adjusted the dates. But it does give an idea of how long Holtec thought it would take to go from application (7/5/22) to restart (mid-2024). Does the same two year timeline apply now? It seems Holtec indicated at the 10/3/23 meeting with NRC that restart could be achieved by August 2025. That's what the *Holland Sentinel* reported.

Of great importance is Holtec's admission:

NE's commitment to award the grant (roughly 2 billion dollars) in early 2024 is an indispensable predicate. In 2024, we expect the project to be substantially completed which means most of the required funds will have been expended. Re-start is expected to occur by mid-2024).

\$2 billion means either a \$2 billion loan guarantee, or a \$2 billion CNC grant, or some combination of the two.

But it would seem the roughly \$2 billion of which Holtec speaks would be all CNC funding, because it then refers to the \$1 billion figure as a distinct, "bridge loan" from DOE Loan Programs Office. So really this is a \$3 billion request, especially considering that DOE loan guarantees do not need to be paid back. There is zero interest charged, and zero risk to Holtec, on the billion dollar loan sought.

I've been saying \$1.2 billion for CNC grant, and \$1 billion for loan guarantee. The \$1.2 billion was arrived at by dividing the CNC program's \$6 billion by five years, \$1.2 billion per year. But even the CNC grant made to Diablo in 2022 wasn't exactly \$1.2 billion. Sometimes it was reported as \$1.1 billion, other times \$1.4 billion. Needless to say, the CNC program is quite opaque.

But here Holtec says \$2 billion is SEPARATE FROM the "bridge loan" from Shah at DOE LPO.

We think the "bridge loan" from Shah at LPO is \$1 billion, and is the lowest hanging fruit of all, compliments of the 2022 IRA (Inflation Reduction Act).

The \$1.2 billion (or, we now learn, "roughly" \$2 billion) from the CNC fund, compliments of the 2021 BIL/IIJA (Bipartisan Infrastructure Law/Infrastructure Investment and Jobs Act).

But it seems Holtec is seeking \$2 billion, and \$1 billion, or \$3 billion from DOE for restart, if the above is read plainly.

Plus \$300 million from the state.

So \$3.3 billion all told for restart.

Plus \$7.4 billion for 4 SMRs.

So \$10.7 billion all told.

That does not even include the PPA gouge on unsuspecting and unwitting ratepayers who've been betrayed by their own co-op decision makers.

So here was Holtec saying on July 5, 2022 that restart would occur by mid-2024, about two years later.

And, very significantly, that *most of the required funds will have been expended.*

By mid-2024.

Elsewhere in this very application Holtec admits it only has \$500 million in hand — they seemed to be referring to Holtec International. Or do they mean the Palisades-specific LLC, and its DTF? Or do they mean at the mothership? \$500 million is not that much money, relatively speaking. If they did mean the Palisades LLC DTF, they aren't supposed to be using that money for restart. That would be illegal. And of course Holtec spokespeople have gone out of their way, at each and every one of the Holtec-NRC regulatory restart meetings, after the 3/20/23 mtg., to emphasize the funding for restart is not coming from the DTF, but rather from Holtec International. We still suspect that is not true.

Given fired Holtec CFO/whistleblower Kevin O'Rourke's revelations, it appears that Holtec may have little to no money whatsoever, except for the DTFs at the various sites — Indian Point, New York; Pilgrim, Massachusetts; Oyster Creek, New Jersey; Palisades, Michigan. In point of fact, in 2022, according to Holtec's 3/31/23 disclosure report, fleet-wide in 2022, Holtec spent \$565 million from its various DTFs. How much decommissioning work was actually done for that huge amount of expenditure?! This is strong circumstantial evidence that Holtec is actually spending money from the Palisades DTF — and perhaps other DTFs — illegally. Compare the March 31, 2023 Holtec report on expenditures from its various DTFs. Its rate of spending is shockingly high, especially considering how little decommissioning work is being accomplished, especially at Palisades. Perhaps it plans to try to sneak the expended funds back into the DTFs at some point — as when the state of MI's and DOE's largesse rolls in for Palisades restart? Or perhaps it doesn't plan to pay back the DTF at all? It doesn't appear the NRC cares at all. So why pay it back? NRC seems content letting Holtec get away with murder at Palisades, not just in terms of looting the DTF illegally, but also in terms of not cleaning up radioactive contamination, just leaving most to all of it in place and walking away. After all, what are shell companies for? What are LLCs for, but to safeguard the parent corporation from risk, accountability, and liability? The thing that is suspicious about Holtec saying “the bridge loan will be paid off by the grant...

received from NE” (DOE Office of Nuclear Energy) is that loan guarantees, post Calvert Cliffs 3 anyway, as at Vogtle 3 & 4, have been risk free and interest free. That is, no credit subsidy fee has been charged, and if the borrower defaults, it is the US taxpayer left holding the bag, not the borrower, Holtec.

So why would Holtec pay back the loan guarantee if it doesn't have to? Doesn't seem in character for them to do so

It's also strange that Holtec is looking to DOE not only for \$2 billion, from ONE (Office of Nuclear Energy, presumably all CNC funds), but also to DOE for the \$1 billion “bridge loan,” from LPO.

Granted, the \$1 billion LPO loan guarantee is lower hanging fruit. Holtec has seemed to prioritize since at least early 2023 — we learned this from a very brief mention in passing in an ExchangeMonitor article I think it was, not long before the March 2023 NRC-Holtec mtg.

So Holtec could get this \$1 billion sooner.

So if Holtec does use the \$2 billion it gets later from ONE — presumably all CNC funding — to pay back the \$1 billion loan guarantee, that would mean “only” a \$1 billion grant from DOE, and a \$300 million grant from MI, or \$1.3 billion for restart. (This does not account for the gouge of the PPA to come, at ratepayer expense, and to Holtec's benefit.)

But we do not trust Holtec to pay the loan guarantee back!

Talk is cheap. Words are cheap.

But could this statement in this application count as a contractual obligation? Probably only if DOE/DOJ chose to sue, and they probably would never do so. This is a Democratic administration willing to hand over billions, even tens of billions, to Holtec. Democrats would never chose to sue, therefore. Republicans likely would never sue over such a thing either, even though initiated by Dems — R's fiscally conservative hypocrisy. Notwithstanding all the noise U.S. Rep. Upton and other Rs made about the Solyndra solar loan guarantee in the last part of the first decade of this century, for “only” \$535 million. This loan guarantee is for nearly twice that. And is much higher risk on its face. R's pro-nuclearism trumps all other considerations.

The above statement by Holtec seems to indicate that they would be spending heavily on restart related work, as soon as they got money in hand. They've likely had the \$150 million in hand from the State of MI for months, even though our coalition wrote Gov. Whitmer, urging she suspend the pay out, given fired Holtec CFO O'Rourke's whistleblower allegations of fraud.

So has Holtec already begun spending the \$150 to 300 million from the state? It likely has.

Has Holtec also been spending vast amounts of Palisades DTF money on the restart scheme?

We've made that allegation formally and officially to NRC by early April 2023. They recently got back to us and told us it isn't so. Well, NRC did say Holtec had misspent \$53,000 of DTF money, but that it would be replaced. (Ironically enough, \$53,000 is very close to the figure for Holtec's bribe at Browns Ferry, AL many years ago.)

But the above statement is further damning circumstantial evidence that it IS so. NRC should not be taking Holtec's word on this. But it seems to be.

At the very best, Holtec appears likely to be "borrowing" from the DTF for the restart scheme. Even if it intends to "pay back" the DTF with the bailout money it gets from the state and DOE, this "borrowing" is still illegal.

But more likely, the "borrowed" funds will simply never be "paid back," adding insult to injury.]

(iii.)

USNRC: The UNNRC's regulatory approval to revive the license and expeditious approval of the License Amendment Application prepared by Holtec will be essential to revive the project.

[Don't worry about Holtec's sloppy typos: UNNRC. It would never make any mistakes in terms of running reactors.

EXPEDITIOUS APPROVAL is ESSENTIAL.

We will challenge and resist NRC operating licensing approval at every turn. As NRC Commissioner Crowell has stated, licensing should have to start from scratch. No short cuts.]

(iv.)

Holtec International: Designing the new equipment to replace old worn-out hardware such as the Steam Generators, updating the SAR and preparing License amendment applications, entering into a partnership with a qualified Operator, assembling the work force, conducting necessary trainings, etc. are among the responsibilities that will have to be shouldered by Holtec

[We will challenge Holtec's shenanigans at NRC at every twist and turn.]

We believe that with a strong spirit of collaboration this project, with each party performing its role, can well become a shining talisman for the global nuclear industry

{Emphasis and yellow highlight added}

[More hyperbole. Messianic talk!

Talisman: an object, typically an inscribed ring or stone, that is thought to have magic powers and to bring good luck

Or, good fortune. Or large fortunes. We'll need good luck, if Palisades is to be operated again, for decades to come. Those are a lot of radioactive bullets to dodge, as we already have been for the past half-century.

Magical thinking:

The belief that one's ideas, thoughts, actions, words or use of symbols [talismans] can influence the course of events in the material world. Magical thinking presumes a causal link between one's inner, personal experience and the external physical world.

What about psychological definition?

But, like Donald Trump — the con man/narcissist/megalomaniac in chief, Singh et al. are politically and economically powerful, because they have gotten MI, DOE, NRC, etc., to join them in their magical thinking. And, most significantly, to hand Holtec the massive bailouts, lax permits, and so on. "Drinking the Kool-Aid" is a phrase that seems to apply here, as well.]

"Page 3 of 42" (Page 5/42 on PDF counter)

SECTION B: PROJECT DESCRIPTION

B.1 Executive Summary

The first two steps in this effort are the commitment to a Power Purchase Agreement (PPA) secured from the Michigan Public Services Commission (MPSC) followed by the DOE approval and funding of the project. We believe that a qualified Operator will come on board after the first two initial steps are met. Holtec envisions to continue to own the facility, make all required upgrades to secure a 20-year operating license extension, recruit a qualified operator and re-

constitute the Plant's work force in collaboration with the selected Operator and restart the plant. The funding of the project is a critical factor which must be achieved under the current constraints

[Holtec has already checked off a number of these boxes. A Holtec spokesman at the March 20, 2023 meeting with NRC called them "pillars" for restart. He mostly meant the bailouts.

Holtec will still need to get NRC to restore the Palisades operating license. We will fight this at every opportunity.

It will need NRC to approve another 20-year operating license extension, out to 80 years of operations. We will fight this too.

That would then be 2031 to 2051; so if it restarts, that would be 2025 to 2051, or 26 years of additional operations.

It'll probably ask for the 2022 to 2025 down time back — so that would be a 3-year license extension off the top, easy peasy, lickety split.

Palisades already did this re: the 1967 to 1971 construction phase. In 2007 it got 4 more years, out to 2011.

Of course, if Palisades is supposedly "idled," in Holtec's words, that would mean still operable. Still operable under its 2011-2031 license extension. So there should be no 3-year license extension. Palisades down time is simply a longer than usual outage, like a re-fueling outage, Holtec argues. So those years should simply count as operable years then — no license extension should be granted.

Is industry taking advantage of months-long re-fueling outages, getting NRC to return that time to the end date of their licenses? This sounds absurd. But it is the very logic Holtec is applying.]

(ii)

The State's MPSC provides a PPA to Palisades for the Plant's service life (at least 20 years) to ensure long-term viability of the Plant.

[The figure of 28 years has been reported somewhere in the media.

$2031 + 20 = 2051$

$2023 + 8 = 2031$

2023 to 2051 is 28 years. So perhaps that is where the 28-year figure comes from.]

(iii)

The DOE approves the loan application with appropriate provisions to protect the program from the fickleness that is known to afflict some federal programs with a shift in the calculus of power in Washington (further discussed under paragraph b.4 below). With a firm contractual commitment from USG and a prescribed date when the federal tap for funding would open, say Date X), Holtec will be sufficiently reassured to make an application to the LPO to seek a bridge loan to cover our costs till Date X to enable us to continue work at full speed. We understand Date X is December 2023.

[And who is protecting the U.S. taxpayer against nuclear loan guarantee abuse to the tune of a billion dollars? Certainly not DOE. But the same could be said of the additional two billion dollars of bailout from DOE in CNC funding, \$300 million given away by State of Michigan, PPA gouge, etc. And then there is health, safety, security, and the environment!

By how long is Holtec's Date X of December 2023 delayed? It seems less than two years. Holtec seemed to indicate a new Date X at the Oct. 3, 2023 meeting with NRC: August 2025.

Holtec speaks of working full speed. Are they working at full speed right now, using the \$150 to 300 million from the State of Michigan? Even though it should not flow, till DOE subsidies flow?

What is or has been happening at Palisades up till now, if anything?

Has Holtec been spending its own money? What money? Does it even have any?

Or has it been spending the DTF money, as we suspect?

If so, does it plan to put the money back, or not?

Even if it does plan to put the money back, this is still illegal. You can't rob the bank, then put the money back, and call it even, all past crimes forgiven. It's still bank robbery.]

(a.)

Perform deferred maintenance

[They probably don't mean lid (reactor vessel closure head), nor embrittled RPV (reactor pressure vessel). They mention SGs (steam generators), but probably mean plugging tubes at best. They probably mean continuing band aid fixes to crdm's (control rod drive mechanisms) only, not root cause determination and real fix. Why would they do any of this, if NRC does not require it? This is where the safety requirements of the CNC funding go off the rails. So long as everyone believes the lie that NRC is keeping a lid on things, all is fine, right? The only thing NRC keeps a lid on is our safety interventions. That's what their real job is, to get rid of us and our allegations and warnings.]

(b.)(1.)

Preservation of the Interconnect Rights to the Switchyard: Modifications to the existing switchyard, which is owned by Consumers Energy, have already been performed by the Palisades staff to remove the plant from certain regulatory requirements governed by the Midcontinent Independent System Operator (MISO). Discussions with the Consumers Energy have occurred regarding preserving the rights for 1-2 years and Consumers Energy is endeavoring to accommodate this; additional assistance may be required from the governor's office. A replacement generation agreement will be required to bring the Palisades generation capacity back on the grid.

[Seems Consumers Energy and Holtec are working in close cahoots, secretly, outside of public view. To block renewables' access to grid, is that it?!

The state will be called in as needed.

Is this legal?

Perhaps that is state's supposed role, per Holtec above, to "make it legal"?

It seems they are making a lot of this up as they go.

Note yellow highlight — Holtec acting behind closed doors, to avoid regulatory requirements/scrutiny. True to character. Not okay. Illegal?!

I wonder if MISO knows about this? Do they care their requirements are being circumvented in the dead of night?]

(2.)

Power Purchase Agreement Including Capital Funding: A Power Purchase Agreement (PPA) with Michigan will be required to participate in the power generation and to sell the capacity on the grid. The Michigan Public Service Commission (MPSC) issues the PPA. In order to bridge the time until federal funding is authorized, it is estimated that this PPA needs to contain approximately \$300 million of capital funding to allow for the purchase of new nuclear fuel and critical equipment necessary for the refurbishment and startup of the plant. This funding would be used in lieu of the decommissioning trust fund (DTF) which cannot be accessed for capital improvement by regulation and explicitly allows the DTF to be used only for radiological decontamination, spent fuel management and site restoration. Additionally, certain members of Congress have expressed concern that both state and federal funding should contribute to this initiative.

{Emphasis and yellow highlight added}

[So ratepayer money in the DTF is supposedly off limits, but Michigander taxpayers are fair game, to the tune of \$300 million?! But these are the same people! Wolverine customers are MI taxpayers! And MI taxpayers who are not Wolverine customers are also taking a hit!

Is the \$300 million of capital funding the same as the \$300 million Holtec has requested from the state in handout form? At least half of that has already been approved, if not the full amount, yet anyway.

So, certain members of congress are involved, secretly, behind the scenes?! Which ones?!

Everyone involved seems to seek others' involvement, in order to supposedly justify their own involvement.

Compare this to the nuclear bribery scandals in Ohio and Illinois. Compare this to the nuclear fraud scandals in South Carolina. A number of convictions, and prison sentences, involved!

It can't be wrong or improper if all these agencies and leaders at the federal and state levels are involved, can it? It must be okay, normal behavior, not a grand conspiracy of high risk taking, and pilfering of the public.

So even Holtec gets that it must watch its step, at least in terms of widespread state and federal financial involvement, in order to make it all appear legitimate. But as we have communicated to both the Energy Secretary (re: Palisades prima facie CNC funding ineligibility), and the MI state legislature and governor (including the fired Holtec CFO's whistleblower complaints of fraud), none of this is legitimate.

But has it been "borrowing" from the DTF, with plans to "pay it back"? This would still be illegal. A bank robber can't "un-rob" a bank by returning the money!

So the usage of the \$300 million from the state is spelled out here, it seems. It allows certain activities to be undertaken immediately (new nuclear fuel to be ordered, equipment fabrication needed for refurbishment), while greasing the skids for orders of magnitude more federal taxpayer money to follow.]

3. Reversal of the “Permanent Cessation of Operation” and NRC License Continuance: Upon shut down and permanent defueling, Entergy, the previous Palisades owner and operator, submitted a letter to the NRC to certify that power operations ceased at Palisades and that the fuel was permanently removed from the reactor vessel and placed in the spent fuel pool. It is understood and acknowledged that upon the NRC’s docketing of these certifications, the license for Palisades no longer authorizes operation of the reactor, nor emplacement or retention of the fuel into the reactor vessel. This certification of permanent cessation of power represents a substantial licensing action. Additionally, Holtec Decommissioning International (HDI) submitted to the NRC a request for exemptions from specific requirements of sections 10 CFR 50.82(a)(8)(i)(A) and 10 CFR...

{Yellow highlight added}

[I’m glad Holtec agrees here, in this secret 7/5/22 bailout application to DOE. But the Holtec spokespeople at the four previous regulatory restart pathway meetings sure haven’t let on that it’s “a substantial licensing action.” They’ve asserted it would be easy peasy for NRC to simply reverse the paperwork. What Holtec says in public, and what it says behind closed doors like here, are very different things indeed!]

“Page 5 of 42” (p.7/42 on PDF counter)

...50.75(h)(1)(iv) which permit HDI to make withdrawals from the Palisades DTF for spent fuel management and site restoration activities without prior notification to the NRC. The exemption would only apply to HDI when the license transfer transaction is consummated, which is now complete.

All licensing action associated with decommissioning activities at Palisades must be evaluated for either reversing the actions or re-licensing the plant for power operations. **This is a first-time evolution within the nuclear industry and would require extensive interactions with the NRC to determine the appropriate licensing path. The NRC would require thorough inspection of the plant to certify that it is safe to refueling, startup and operation. It is unknown if the NRC would require substantial modification or building code upgrades beyond that already envisioned.** {Yellow highlight added}

[Well, they have held four NRC-Holtec regulatory restart pathway meetings, between March 20, 2023 and October 3, 2023. And documents back and forth associated with the meetings.

Burn me once, shame on me. Burn me a million times, shame on you. NRC has never required lid and steam generator replacement, so why would they now? NRC has never required RPV annealing, so why would it now? NRC has never required CRDM root cause analysis and comprehensive corrective action, so why would it now? NRC has not even required capsule withdrawal and analysis, nor other more cutting edge techniques (such as Dr. Digby Macdonald's citation to nano-indentation methodology), so why would NRC start now? It's shocking but not surprising, NRC's decades-long permissive behavior. Laissez faire nuclear "regulation." So don't count on NRC to ever do the right thing, only to rubber-stamp whatever Holtec asks.]

4.

Federal Funding from the Department of Energy (DOE): The DOE has a program, recently approved by Congress, which provides funding to extend the life of older nuclear plants. The funding available totals approximately \$6 billion. In our estimate, Palisades would require approximately \$1 billion to \$1.6 billion and one to two years to refurbish the plant to an acceptable level that the NRC would permit resumed operations. **The long-term asset management and equipment reliability strategies at Palisades were suspended due to the permanent shutdown of the plant. Equipment maintenance and repairs are overdue, and upgrades are necessary.** New nuclear fuel must be procured for the site, this is an activity that can take several years depending on the manufacturer commitments. The site will still be required to execute the spent fuel campaign because the spent fuel pool is near capacity, and it is necessary to off-load used fuel before new reactor operations can commence. The plant may also need steam generator repairs or replacement, which is a significant expense and commitment for the future outage of extended duration.

{Yellow highlights and emphasis added}

[Nice of them to admit all this — especially the bolded part above — in a secret application to DOE for billions of dollars in bailouts. But they would do any such repair/replacement of steam generators in house, as they've said elsewhere in this application, while bragging up their Camden facility, so they'll be paying themselves with bailout money, overseeing their own QA, etc.

It is not extending the life of an older plant, it is restarting a permanently shut down plant. That is a legally significant difference under the language in the organic statute, the BIL/IIJA, re: the CNC funding. The reactor is supposed to be operable/operating, not inoperable/closed.

I wonder if the same is true for the IRA nuclear loan guarantee — is a closed reactor like Palisades even eligible?

They keep changing the figures for the money needed, moving target, moving goal posts. Here they say \$1 to \$1.6 billion of presumably CNC funding. \$600 million is quite a gap, by the way. Why can't they define their need more precisely than such a huge range? But elsewhere above they already said roughly \$2 billion, for presumably CNC funding alone. So which is it Holtec, \$1 billion, \$1.6 billion, or roughly \$2 billion? Why can't you be more precise?!

5.

Repair, Refurbishment and Upgrade work Needed for Palisades: The Palisades plant has deferred several upgrades in anticipation of permanent shut down. Significantly to note, Palisades performed a technical specification driven shut down 10 days prematurely due to control rod drive mechanism (CRDM) leakage. Given the unknown equipment and material condition of plant, an extended maintenance and refueling outage would be needed to execute the known repairs. At a minimum, based on current material information on the plant, an extended maintenance outage would include the purchase of new nuclear fuel, relicensing of the facility, steam generator (S/G) inspection and possible tube plugging or S/G replacement. Switchyard upgrades and modifications are also necessary. Some control room indicators were removed by the former owner from the simulator to support operating plants in their southern fleet. These missing modules will need to be restored and the simulator computers validated for use. The simulator computers and associated software were not managed as part of the ownership transition as there are no requirements to use the simulator in the decommissioning phases. Finally, a number of computer systems and software packages have been turned off and will need to be recovered to restore the Engineering Department's capabilities as well as the Operations Department ability to monitor the plant process computer.

[Not planning ahead has really cost them. But what do they care — they are spending other people's money. Like NRC Commissioner Crowell asked in the Feb. 2023 ExchangeMonitor interview — why did they wait till the last second like this? What were they thinking? Clearly they were not thinking, and now it's a costly sprint at high expense to make up for that.

Thank you Holtec for acknowledging problems with CRDMs — but will you do more than a band aid fix, yet again?

By the way, 11 days early, not 10 — May 20, not May 31.]

6.

Jobs Restoration: Additionally, staffing requirements at the site would need to be addressed.

Approximately 400 additional personnel including bargaining unit personnel are required to staff Palisades estimating 650 operating positions, including the regulatorily required positions. Most significantly, an entire complement of operational staff would need to be hired and either re-licensed or initially licensed by the NRC, which the Holtec believes could take up to 18 months to accomplish. Other notable areas of personnel gaps are the complete loss of the Training...

{Yellow highlight added}

[At the Oct. 3, 2023 meeting with NRC, Holtec said only 500 jobs total, not 650. So, going from the current ~220 employees, to 500 workers, means only 280 restored jobs.

\$3.3 billion in subsidies from DOE and the state would mean \$11,785,714.30 per restored job. How absurdly inefficient and wasteful. The opportunity costs are off the charts bad.]

“Page 6 of 42” (P.8/42 on PDF counter)

...Department that is required for maintenance of operator licenses. Similarly, the loss of INPO membership means that the Training Department requires a recertification by INPO in order for the NRC to credit the training program’s effectiveness. It is unknown at this time which INPO audits or assist visits were terminated in the last year of operations that will have to be put back in place once the requisite staff has been rehired and trained

The tables that follow summarize the major areas of cost estimated to restart Palisades to full power operation.

{Yellow highlights added}

[Specifics on costs, straight from the horse’s mouth. For example, Table #1, Item #1, New Fuel, is \$240 million. But the tables provide detailed cost figures for the long check list of actions needed to restart. Total, \$582 million. So why is Holtec asking for \$3.3 billion in bailouts alone, and a PPA ratepayer gouge on top of that. To maximize profits, that’s why. To make it worth their bother. To sate their insatiable greed.]

Table 2: Operating Budget Support (required to leave the DTF fund intact)

[Were/are they tempted to “borrow” from it in the meantime — have they been doing so? If so, will they pay it back? Doesn’t matter — still illegal to “borrow” temporarily. But how did they spend so much — \$44 million in five months, June 28 to Dec. 31, 2022? On what? Especially considering they’ve admitted repeatedly they have done little to no decommissioning work, and what they have done is so minimal as to be easily reversible. All this by intent, to keep Palisades

as ready to restart as possible — except they have not been actively maintaining vital safety significant systems, structures, and components.]

Item #2

Additional labor to recover and restart the plant ~ 400 people

\$155M

[\$155 million/400 workers = \$387,500 per worker.

But as of Oct. 3, 2023 meeting, they were no longer talking 400 workers, only 280 workers' jobs restored.

And they may claim restoring 400 jobs would cost only \$155 million. But without paying for all other costs, those jobs would be created for nothing. Holtec is asking for \$3.3 billion in public bailouts to restart Palisades. Only 280 jobs would be restored. That's nearly \$12 million per restored job, by that measure.]

Item #5a

Update Reactor Vessel Fluence and disposition embrittlement results

[So they even pretend to care about that. But no talk about annealing, nor even pulling last capsule(s) to examine. Not clear they really care at all, except to keep the illusion alive that all is fine with embrittlement, just like Entergy and Consumers Energy before them.]

Item #7.

Licensing Basis Recovery

\$6 million

[So that is what we are up against even at the NRC-Holtec regulatory restart pathway meetings alone, and the proceedings to follow.]

“Page 7 of 42” (p.9/42 on PDF counter)

Table 3: Capital Projects

Item #3

S/G design, fabrication, replacement (includes reactor coolant system redesign, cold-hot-fuel testing)

\$510 million

{Yellow highlight added}

Table 4: Proposed Total Investment

\$1.61 to 1.935 billion

{Emphasis and yellow highlight added}

[There is the “roughly \$2 billion” figure?]

B.2 Project Eligibility

The Palisades Nuclear Plant was shut down on May 20, 2022, following a record-breaking period of continuous operations. The plant had been well maintained and was previously granted a life extension through the year 2030.

[What about its nuclear lemon status earlier in its career? Including after Fukushima, when it had numerous very serious problems, including unplanned shutdowns. One example was the 2012 Yellow Finding that should have been a Red Finding, when a worker nearly electrocuted himself in the control room. Half the electricity to the control room was lost. It was a very serious incident, including re: Pressurized Thermal Shock risk — the ECCS was nearly activated, inadvertently. That was a near-miss to testing all the happy talk on embrittlement!

Well maintained? What about the RPV? SGs? CRDMs? Lid? Etc. Just above, Holtec itself admitted in writing that the inspections and maintenance were neglected, as the plan was to permanently shut down, therefore Entergy coasted in the final years. So Holtec is speaking out both sides of its mouth and contradicting itself here. If Palisades is so well maintained, why will it cost \$2 billion and take several years to ready for restart?!

It's actually 2031, but let's quote Holtec on their own erroneous year of 2030 and hold them to it. Of course, restart is entirely unsafe and should not happen, even for one day.]

Economic decisions caused the former owner to discontinue plant operations and to then sell the unit to Holtec for the purposes of decommissioning.

[Yes, the gouge of the 2007 to 2022 PPA ended, so Entergy said bye bye.

Now Holtec wants to gouge ratepayers again with a new PPA lasting 20 to 28 years.

What happened to decommissioning, the false pretense?

How was that bait and switch trick not a major fraud perpetrated on the public?]

While the plant has already shut down, permanent alternations to the plant to prepare it for decommissioning have been put on hold, therefore, physical return to service is technically possible.

{Yellow highlighting added}

[So how in the world did Holtec spend \$44 million, just from June 28 to Dec. 31, 2022? How much on spent nuclear fuel management? How much on site restoration? How much on decommissioning?

How much on restart scheme — which is illegal.

Holtec admitted on March 20, 2023 that the only decommissioning work done was minor modifications on the mechanical draft cooling tower, all easily reversible.

So how did they spend \$44 million?!

Has that rate of expenditure continued since Dec. 31, 2022?!

When is the next such DTF expenditure reporting deadline?

March 31, 2024, or March 31, 2025? Elsewhere in this doc, Holtec indicates latter, which isn't good.

What about active maintenance of the SGs? Turbine-generator? Pumps? Other safety significant SSCs?

How is the above admission not grounds for fraud charges against Holtec? Holtec took over Palisades under false pretenses.]

Per the timetable of Section V of the amended criteria of the Civil Nuclear Credit Program, Palisades meets the DOE's prioritization of funding to plants that announced closure.

[That is not true. We have called them on it repeatedly, as in our coalition letters to DOE. Holtec wants to fudge the issue, muddy the waters. So does DOE. DOE's revised guidelines are not legal. The CNC funds are for open and operating reactors, not closed ones!]

B.3 Project Sponsor's and Principal's Capabilities

B.3.a Company Overview

[Compare all of Holtec's bragging about itself to whistleblowers Oscar Shirani at Commonwealth Edison/Exelon, and Dr. Ross Landsman's (NRC dry cask storage safety inspector) revelations in 2003 and before and after.

There are seeds of destruction planted in every single one of Holtec's containers, for starters. Shirani questioned their structural integrity sitting still, going 0 mph, let alone rolling down rail lines at high speeds.]

"Page 8 of 42" (p.10/42 on PDF counter)

Nuclear Engineering: Criticality Analysis, Radiation Analysis, Shielding Requirements, Reactor Design, Nuclear Physics, Critical Heat Flux Analysis, Probabilistic Safety Analysis, Emergency Planning and Dose Assessments

[What were the chances of the worker getting doused and dosed at Oyster Creek, New Jersey?

What were the chances of the worker backing into the power pole at Oyster Creek, and taking out electricity for 30,000 people?

What about Singh's praise for Shirani for catching the neutron barrier flaws in radioactive waste containers, pre-2000?]

Solid and Soil Mechanics: Structural Analyses, Seismic Analysis, Impact Analysis

[So Holtec should understand full well how unsafe the dry cask storage is at Palisades from a seismic perspective, per Landsman's warnings dating back to 1994?!]

Licensing: US and International Licensing Applications, Environmental Assessments, Siting Applications, Local Permitting Applications, Licensing and Project Support Services

[Compare this bragging to Holtec's actual performance in New Mexico, including countless Requests for Additional Information from NRC. Holtec's License Application was half-baked for many years on end — still is, actually, many long years after it was initially submitted! Half-baked, like this 7/5/22 bailout application!]

“Pages 8 to 9 of 42” (pgs.10-11/42 on PDF counter)

[Holtec bragging up QA is rich, given Shirani and Landsman's whistleblower revelations dating back to 2001 or earlier]

“Page 9 of 42” (P.11/42 on PDF counter)

B.3.c Financial Profile

The Company has no long-term debt; the Company has had no long-term debt in its entire corporate history despite making major capital investments such as building a 52-acre Technology Campus for over 310 million dollars in Camden NJ, completed in 2017.

[\$260 million was ill gotten — Singh's lie, under oath, on the State of NJ Economic Development loan application re: ban and bar history due to implication in bribery conviction]

Holtec has earmarked significant funds each year for applied R&D which the Company expenses every year. The Consolidated Interim Storage and the new SMR-160 reactor programs, the

former being entirely funded from the Company's operating budget, are current ongoing company endeavors that detract from the EBIDTA.

[Fired Holtec CFO, turned whistleblower, Kevin O'Rourke, alleges that CISF (Consolidated Interim Storage Facility) will lose \$750 million over first five years.]

Despite the Voluntary EBIDTA diminishing R&D activities, Holtec's balance sheet stands at over half a billion dollars in assets and a 9-digit annual EBIDTA.

[\$500 million is not that much, in the grand scheme of things. Fired Holtec CFO whistleblower alleges Holtec is deep underwater: \$750 million in losses predicted over first five years at its NM CISF; \$100 million in revenues attributed to a new business venture that don't actually exist yet; etc.]

To conduct overseas nuclear projects, Holtec issues (and receives) appropriate letter of credit stipulated in the respective contract: no letter of credit has ever been called by a client and no Holtec client has ever discontinued its relationship with the Company.

[Not true — PG&E at Diablo Canyon severed dry cask storage contract with Holtec and went with Orano instead — Holtec threw a tizzy fit about it at the time, in writing and publicly! Ad hominem attacks against PG&E were launched by Holtec re: its decision.]

Holtec has never defaulted on any company obligation in its corporate history.

[Compare Chernobyl whistleblower allegations, that Holtec had almost entirely abandoned its contractual obligations re: high-level waste there. A single Holtec employee remained on the site. All others had left. It resulted in the high-level waste still being vulnerable in indoor wet storage pools when the Russian military invasion began and seized Chernobyl for a time. The waste was supposed to have been removed into supposedly safer dry cask storage, years before 2022.]

B.3.d Enterprise Stability

Because of the typically long-life cycle of its dry storage contracts, Holtec is unique in having its...

...order book extend out for decades in the future which confers long-term financial stability on the Company.

[So if and when Holtec dry cask storage containers start to fail over time, Holtec will be right there to make its customers whole, right? With safe replacement containers, transfer services, hot cells, etc.? Yeah, nope.]

Holtec has a mix of mature and emerging businesses. Dry storage is a three-decade old mature business which while profitable, has a rather modest scope for additional growth. On the other hand, nuclear decommissioning is a growing business segment. Holtec has established an early lead through a cutting-edge Holtec Decommissioning Model (HDM) which has vaulted the company to industry leadership. It is expected that the decommissioning segment of Holtec's Business will continue to grow rapidly in the next decade.

[But Holtec doesn't care about decommissioning. It plans no decommissioning any decade soon at Palisades — instead, zombie reactor restart, and SMR new builds. It said earlier, it only acquires shut down reactors primarily to bank the land for future SMR new builds. Of course, it doesn't mind looting the DTFs either. But it intends to do as little actual decommissioning as it can get away with. And any shutdown nuclear power plant that Holtec swoops in to take over ownership of, supposedly for decommissioning purposes only, local residents should be very concerned about. Earlier in this bailout application, Holtec came right out and said it is banking land for SMR new builds. Perhaps even at Indian Point, NY and Pilgrim, MA — perhaps Holtec is just biding its time in those places, till the stars align politically, enabling it to announce its SMR new build schemes there too, like it already has at Palisades and Big Rock Point in MI, and at Oyster Creek in NJ.]

Holtec's decommissioning projects in which Holtec takes ownership of the site and accepts the decommissioning liability are very financially secure, as the source of funding for that decommissioning work is securely held in a funded decommissioning trust fund that is owned and controlled by an autonomously managed Holtec subsidiary

[Which in the case of Palisades, blows through the money, while accomplishing little to no decommissioning. It seems, in the March 31, 2023 Holtec DTF expenditure report, that Palisades is not the only location where Holtec is rapidly spending down DTFs. How much actual decommissioning is Holtec doing at sites like Indian Point, NY; Pilgrim, MA; Oyster Creek, NJ, given the figure of \$565 million in 2022 DTF expenditures by Holtec fleet-wide?]

“Page 10 of 42” (p.12/42 on PDF counter)

Holtec’s SMR-160 light water reactor is the technology seed corn that has been nourished by the Company with its own funds since 2010. It is expected to begin yielding a great harvest in the latter half of the 2020s. The global market size is over one trillion dollars.

[Now holtec seeks \$7.4 billion in nuclear loan guarantees from DOE for 4 SMR new builds at Palisades alone. It has threatened more SMR new builds at Big Rock Point in n. MI, Oyster Creek in NJ, and 20 in Ukraine.

Will this SMR nuclear relapse go as well as the gigantic reactor nuclear relapse of the Bush/ Cheney years? Of three-dozen proposed new giant reactors, only two are still slogging ahead — Vogtle 3 & 4, more than 5 years behind schedule, more than double the price tag of 2012, an order of magnitude more expensive than NEI’s predictions in 2001 — that is, \$30 to 35 billion for the 2 reactors, instead of “just” \$15 billion, or even \$5 billion, respectively.]

The Consolidated Interim Storage facility announced by the DOE as a national mission, is under development since 2017 as another significant Holtec Domestic (sic) seed corn investment. It is projected to produce handsome profits in the near term (this decade)

[It will not open, for starters. It will be stopped. If our coalition has anything to say about it.

Fired Holtec CFO-turned whistleblower, Kevin O’Rourke, alleges that this CISF would LOSE \$750 million in first five years.

So how are such Holtec claims, in writing on this application for “roughly” \$2 billion in taxpayer funds, not financial fraud? Business fraud, wire fraud, mail fraud?]

Holtec operates an advanced cloud-based system that provides instant on-demand information for ongoing projects which gives the Company’s project managers the needed financial feedback to correct their execution path if needed. Because of the rigorous financial controls, a Holtec project seldom experiences a loss

[Compare such Holtec brags to its fired CFO turned whistleblower Kevin O’Rourke’s allegations]

Virtually all equipment manufactured by Holtec's manufacturing plants (three in the US and one in India) are based on Holtec's patents and designs which is unique in the industry, and which ensures that the plants have a long backlog stretching out to a decade or more. As a result, Holtec engineers can continuously enhance the designs resulting in improved costs and better margins. The backlog is also protected by the undergirding patents which discourages pilfering of the Company's IP.

[Holtec has long made such changes on the fly without proper pre-authorization from NRC, raising safety concerns. NRC never calls them on it. Once the investment has been made, NRC won't prohibit Holtec from selling, or others from buying, these products (such as nuclear waste containers) of questionable safety. Changes to Certificate of Compliance, without required approval by NRC in advance of the changes actually being baked into manufactured products. Combine this with Shirani and Landsman's whistleblower warnings about Holtec's rampant Quality Assurance violations, and this is a real recipe for disaster.]

Shirani and Landsman's allegations of QA violations were focused as at US Tool & Die, long since taken over by Holtec]

no history of
failing to deliver on any project out of several hundred completed

[what about PFS at Skull Valley; that project failed; Holtec's containers were never needed to be delivered]

stable corporate leadership

[Singh implicated in bribery conviction; lied about it under oath on \$260 million tax credit application form; racist rants against his own employees; additional bribe offers to silence whistleblowers; if this is stability...]

[and how about dropping ball at Chernobyl per whistleblower allegations?]

"Page 10 of 42" (p.12/42 on PDF counter)

B.3.d.i Project Management

Holtec and HDI management personnel have extensive in-depth experience in program and project management for decommissioning nuclear power reactors, research reactors, federal weapons complex facilities, uranium fuel cycle facilities and other commercial radiological

facilities in technical areas including waste management, dismantlement, project management, regulatory compliance and environmental protection.

[But no experience whatsoever in operating reactors, nor in restarting dead reactors that have been closed for more than 1.5 years and counting. Especially not one as inherently high-risk as Palisades.]

The Holtec and HDI management approach has been developed to drive efficient and effective decontamination and decommissioning with a safety-conscious work environment; radiological protection, radioactive waste handling and strong governance; financial controls, effective corrective action program, performance reporting, monitoring, and metrics. HDI's "fleet approach" has brought consistency and...

[Compare these claims to the dousing and dosing of Holtec's worker at Oyster Creek, NJ with radioactive water; the backing of a vehicle into a power pole at Oyster Creek, cutting power to 30,000 people; the near-drop of a loaded-canister at San Onofre, CA; the list goes on and on!]

"Page 11 of 42" (p.13/42 on PDF counter)

...predictability to the decommissioning of our sites. Together, we currently have three projects running concurrently and recently acquired Palisades, our 4th acquisition on June 28th, 2022.

We have found increased efficiencies through process improvements and implementing lessons learned from one project to the next. For example, the steam dryer located in the upper reactor cavity at Oyster Creek was segmented in a world record 40 days. Through the sharing of best practices, the steam dryer at the Pilgrim Nuclear Power Plant was segmented in under 40 days, the current world record. Using Holtec's approach, Oyster Creek, Pilgrim and Indian Point are all currently ahead of schedule and under budget relative to the project baseline.

[Interesting brags. But irrelevant to Palisades zombie reactor restart. They are not going to decommission Palisades any decade soon, if ever. Perhaps they just cut and pasted all this from previous bids, with little to no editing? After all, they had to submit this application a mere five days after taking over at Palisades.

Certainly Palisades represents a breach of Holtec's touted "predictability to the decommissioning of our sites." Holtec secretly abandoned its decommissioning purposes only mission, which it deceptively used, in a bait and switch trick, to acquire ownership. More than two months after

submitting this ill fated bailout application to DOE, Holtec finally publicly announced its true intentions at Palisades. (July 5, 2022 and Sept. 9, 2022, respectively).]

The Project Controls implements a detailed scoping, estimating, and planning process that has been successfully used on other large complex projects with similar scope and challenges. This capability was developed on worldwide projects including support for Ontario Power Generation, Pacific Gas & Electric at Diablo Canyon, and Magnox on behalf of the Nuclear Decommissioning Authority in the UK.

[Odd they'd bring PG&E up — Holtec lost that dry cask storage contract to Orano!]

“Page 11 of 42” (p.13/42 on PDF counter)

...our NRC bi-annual reporting requirements for trust fund...

[We may have to wait till March 31, 2025 for Holtec's next required Palisades DTF cost accounting. How much of the DTF will they have blown through by then? Doing WHAT?! Certainly not decommissioning!]

B.3.e Compliance with USG's Environmental Justice Policy

[Holtec bragging about its EJ compliance is quite Orwellian. Singh badmouthed his own African American and Puerto Rican American workforce with racist overtones, prompting EJ protests at his front entrance, including by the local NAACP chapter!

Holtec is targeting majority minority New Mexico with the largest high-level radioactive waste dump in the world.

Holtec's list of EJ violations goes on and on.]

The precepts of Environmental Justice (EJ) for the nuclear industry are articulated in the Nuclear Regulatory Commission's (NRC) Policy Statement dated August 24, 2004, which set down the Commission's policy on the treatment of environmental justice matters in regulatory and licensing actions under the Commission's purview.

[This is also rich. NRC has not only approved both CISF licenses — in TX and NM — in violation of EJ, but so too approved PFS's at Skull Valley Goshutes — a bull's eye of environmental INJUSTICE!]

The NRC considers an analysis of disproportionately high and adverse impacts on disadvantaged communities to be necessary to fulfill the agency's NEPA obligations which call for accurately identifying and disclosing all significant environmental impacts associated with a proposed regulatory action. Thus, the NRC's policy on EJ is committed to the general goals of E.O. 12898 which are expected to be met under its normal and traditional NEPA review process.

[NRC's EJ performance in the Holtec CISF environmental scoping and EIS public comment proceedings was atrocious. Some examples:

— what happened to Noel Marquez at the hands of NRC facilitator Francis Xavier “Chip” Cameron at Carlsbad;

— ramming through the DEIS public comment period despite the pandemic — many low income and/or people of color lacked the needed cell phone AND computer to even take part;

— how AFES (Alliance for Environmental Strategies) was treated by NRC staff, Commissioners, and ASLB board — all contentions rejected, so standing not even recognized;

— targeted Holtec CISF site has many Indigenous connections, and is considered an archaeological treasure — yet they are planning to pave it and plop 100,000 to 173,600 metric tons of high-level radioactive waste on top;

— NRC has never acknowledged EJ impacts of transport.]

“Page 12 of 42” (p.14/42 on PDF counter)

Under current NMSS procedures, the potentially affected area is normally determined to be a radius of six tenths of a mile from the center of the proposed site in urban areas, and four miles if the facility is located in a rural area.

[Really? As if a disaster at the CISF would not have impacts beyond 4 miles!

Even DOE recognized a Region of Influence for transport risk that is 50-miles in radius. So single shipments have a ROI of 50 miles, but the entire inventory of irradiated nuclear fuel only

has a ROI of 4 miles, in NRC's eyes?! Of course, 50 mile radius is recognized for standing purposes in NRC's licensing proceedings as well. So what gives, above?!

NRR uses a 50-mile radius defined as the ingestion pathway zone (IPZ) which has been designed to mitigate contamination of the human food chain by a radiological accident at a nuclear power plant. There is no corresponding NRR position on small modular reactors such as SMR-160, whose zone is equal to zero outside the controlled area boundary.

[More magical thinking that is all too relevant — times four SMR new builds — at Palisades!]

“Page 13 of 42” (P.15/42 on PDF counter)

...a distance of four miles is proposed to define the affected area for SMR-160.

[How conveniently small for Holtec. Covert of course is an EJ community: majority African American and low income.

Same is true of Benton Harbor, just 15 miles south.

Black workforce at Palisades has itself been long discriminated against — nooses in lockers, etc. there in early 2000s, when Black workers organized for better treatment (less hazardous jobs, promotions, pay increases, etc.)

And what about Indigenous EJ impacts on the Potawatomi — burial sites, cultural sites, sacred sites at Palisades itself, now threatened by old reactor restart, and SMR new builds?

Why is Holtec even bringing up its SMRs when this application is for the zombie reactor restart scheme bailout? Apparently Holtec cut and pasted from here, there, and everywhere in its rush job of an application. Telling that it says nothing at all about its reactor operating experience — how could it, it has none whatsoever!]

(ii.)

Low income and minority communities: Under current NRC staff guidance, a minority or low-income community is identified by comparing the percentage of the minority or low-income population in the impacted area to the percentage of the minority or low-income population in

the County (or Parish) and the State. If the percentage in the impacted area significantly exceeds that of the State or the County percentage for either the minority or low-income population, then EJ will be considered in greater detail. “Significantly” is defined by staff guidance to be twenty percentage points. Alternatively, if either the minority or low-income population percentage in the impacted area exceeds 50 percent, EJ matters are considered in greater detail. Holtec International follows the above staff guidance to define disadvantaged communities in the area impacted by a Holtec project.

[Despite this, Holtec’s and NRC’s EJ analysis at CISF in NM was very poor. NM is majority minority! It is above 50 percent Indigenous and Latinx, across the state. So Holtec and NRC did an enhanced EJ analysis on the NM CISF? I’d hate to see their less-enhanced version then!

The methodology above is flawed — what if entire county is an EJ community, then the local area and the county won’t differ, so no special EJ analysis is required? What about compared to the country as a whole?! Why is NM continually targeted for nuclear projects?!

Also compare URENCO in Eunice, NM — too much of an EJ violation in Homer, LA, but just fine in Eunice, NM?! Has the nearby state line with TX been used to manipulate EJ analyses for URENCO, and Holtec’s CISF?]

Putting its social responsibility to practice, Holtec built a \$312 million technology campus in one of the poorest cities in America in 2017, Camden, New Jersey.

[Using \$260 million of ill gotten state tax breaks that Holtec lied under oath in order to obtain. That’s money the state of NJ does not have to help the low income and people of color, including in Camden, NJ.

And compare Singh’s racist attack on his own majority African American and Puerto Rican American workers, that inspired protests at his front entrance!

Also compare my annotated bibliography, and Nancy Van’s rap sheet, to Holtec’s claims above, not just in re: to EJ, but other areas as well]

“Page 14 of 42” (p.16/42 on PDF counter)

Consistent with the above ethos, Holtec International has resolved and announced on its website that the Company will not engage in any activity that runs counter to the spirit of Environmental Justice.

[Holtec would have to cease to exist then, as so many of its endeavors violate EJ.]

B.3.e.iv

Holtec's EJ mission announced in the Company's website:

[Well, it must be true then?! Talk is cheap.]

(i.)

Support policies and regulatory actions that advance the use of clean, reliable, and affordable carbon-free nuclear energy to protect the health, environment, and economic well-being of disadvantaged communities.

[This is Orwellian. Nuclear power inherently violates EJ. But in this sense, Holtec and DOE ONE speak the same language. Black is white, war is peace.]

(iv.)

Ensure that no Holtec associate is discriminated against for reason of their ethnicity, religious beliefs, or social background.

[Krishna Singh violated this one himself with his racist rant against his own Camden workers]

(vi) Secure input from disadvantaged communities in the affected areas around a project facility to identify and address environmental justice issues.

(vii) Maintain an effective outreach to disadvantaged communities to enable meaningful participation by the affected citizens

[Oh, like how Holtec treated AFES during the CISF licensing proceeding?! Compare Holtec's filings in that proceeding, seeking to quash AFES's involvement, contentions, etc.]

Comments on the CISFs in TX and NM broke subject matter records. Many tens of thousands of comments opposed to the CISFs were submitted. NRC — and Holtec — ignored them.]

“Page 15 of 42” (P.17/42 on PDF counter)

- a. There will be no adverse impact on the health and well-being of the residents who live around the proposed enterprise (a.k.a., the facility).
- b. The local environment does not suffer any degradation.
- c. The Company’s Project Management will make a concerted effort to seek inputs from the affected communities to ensure that their interests are factored in the execution of the project.
- d. The facility will be sensitive to and respectful of the culture, religious beliefs and customs of the host communities.
- e. The facility will offer employment opportunities to the local residents to the extent possible.
- f. The facility will contribute towards helping improve the quality of life of local residents.
- g. The facility will not create a new type of accident that would endanger the lives or property of the people who live in the local communities.

[But Holtec’s projects, such as the CISF in NM, and its schemes at Palisades, flagrantly violate many of these supposed EJ policies. For example, the CISF risks a release of catastrophic amounts of high-level radioactive waste into the environment of southeastern NM. Also, the Palisades restart is unprecedented — and the SMR new builds will make risks worse.]

“Page 16 of 42” (p.18/42) on PDF counter

Would the facility detract from the local real estate prices as would a prison, a correctional institution or a distillery?

[What about radioactive stigma impact on property values near Palisades?!]

“Page 17 of 42” (p.19/42 on PDF counter)

Will the facility adversely affect livestock in the vicinity of the site?

[What would our CISF standing declarants have to say about this one?! And Fasken Land and Minerals, Ltd. and Permian Basin Land and Property Owners? Many of Holtec’s CISF opponents in NM are ranchers! Including an anti-Holtec resolution passed years ago by the NM Livestock Association!]

Is there a credible scenario wherein an accident at the facility may force local people to evacuate from their homes?

[At CISF, at Palisades, such risks are very large, actually.]

“Pages 17 and 18 of 42” (p.19-20/42 on PDF counter)

Radiological Considerations

[Of course these risks exist; Holtec just denies them.]

Will the facility be amenable to efficient dismantling and decommissioning?

[Why won't Holtec decommission Palisades then like it said it would?]

Site Recyclability Considerations

[Holtec wants to reprocess at CISF — how ironic. Its idea of “recycling”?!]

Will the facility consume large amounts of potable water?

[At both CISF and Palisades, yes of course it would. If the worst happens, beyond consuming large amounts of potable water, Holtec could radioactively ruin a large percentage of the world's entire surface fresh water supply, downstream and downwind, in the Great Lakes.]

Natural Disaster Considerations

Will the facility cause increased risk of natural disasters such as tremors, hurricanes, and tornadoes?

[Red herring. Instead of asking will Holtec's facilities increase risk of natural disasters, what about the consequences of a natural disaster affecting the CISF, Palisades?! A tremor at Palisades could put dry casks under water in Lake Michigan, as Dr. Ross Landsman warned as early as Feb. 1994.]

Hazardous Waste Considerations

Will the facility become a permanent repository of any type of waste?

[De facto permanent surface storage of high-level radioactive waste. This has been true at Palisades since 1971, and would be true at the CISF in NM, if ever opened.]

Will waste generated at the site be protected by continuous security oversight during its temporary storage there?

[Security is woefully inadequate at both CISF and Palisades — catastrophic risk potential. Palisades suffered serious security breaches, repeatedly, during Entergy's watch. There is no indication this would change under Holtec's watch.]

Cultural Considerations

Will the installation of the facility lead to desecration of an Indian burial ground or an archeologically important site?

Will the installation of the site affect any person's ability to practice their religion or participate in traditional cultural practices?

[Compare this to our warning about just that in our coalition's 2006 Palisades DEIS public comments. Will NRC hold Holtec to Entergy's supposed policy commitment, or have they forgotten all about it. Reactor restart and SMR new builds threaten Indigenous burial sites, etc. at Palisades! Re: such impacts at CISF in NM, see my commentary just above.]

“Page 19 of 42” (p.21/42 on PDF counter)

In-house manufacturing of all major capital equipment:

[Compare Shirani and Landsman QA allegations at US Tool and Die in Pittsburgh, which Holtec eventually simply absorbed into its corporate ownership.]

Continuous R&D campaign to improve product quality and productivity:

[Compare hundreds of welding non-conformances at US Tool and Die, per Shirani whistleblowing.]

Copper to copper, and copper to stainless steel, welds — what if/when these “innovative” welds begin to fail?!!]

Integrated design, manufacturing and Quality Assurance infrastructure that is completely paperless:

[Compare to Shirani and Landsman QA violation allegations]

This integrated digital control program is our key guarantor of error-free product output which, to our knowledge, no SMR supplier possesses.

[Again, what do SMRs have to do with zombie reactor restart bailouts? Holtec cut and pasted this application together in a great big hurry — hence all the typos as well, in addition to the non sequiturs.]

“Page 20 of 42” (P.22/42 on PDF counter)

Proven and actively engaged supply chain:

[Compare to Shirani's allegations of non-QA verified raw materials]

Self-sufficiency in critical materials:

[re: Metamic and Holtite, Shirani busted Holtec for faulty neutron radiation shielding materials — Singh praised Shirani at the time for identifying the error so it could be fixed! That warm fuzzy feeling would not last.]

Nuclear industry's best record of supply of error-free systems and components: Holtec delivers hundreds of custom-engineered systems, structures and components to the operating nuclear plants every year. That every one of them has performed its intended function without a single incidence of failure is an unheard-of record of flaw-free supply that stands unblemished since the company's founding in the 1980s. Despite the vast quantity of equipment delivered to the industry, there has not been a single instance of a defective or non-conforming SSC delivery resulting in 10 CFR filing to the NRC.

[Dangerous and disingenuous, not to mention arrogant, to claim perfection. Compare Shirani revelations on rampant QA violations.]

Even hideously complex projects such Chernobyl's used fuel dismemberment and storage were quoted on fixed price basis and successfully completed.

Holtec has a peerless record of completion of complex projects having completed every project undertaking in its corporate history without fail. Projects have included the infamous Chernobyl three-reactor defueling project which languished unfinished by a leading European multi-national until Holtec took over in 2011.

No world supplier comes close to matching this performance record.

[Holtec should be careful bragging about its work at Chornobyl — compare whistleblower revelations. Also, compare PFS at Skull Valley — a Holtec affiliated project that was never completed. It was blocked, just as we hope to block Holtec's CISF in NM.]

Also re: Page 20 of 42 (p.22/42 on PDF counter):

7. Nuclear industry's best record of supply of error-free systems and components: Holtec delivers hundreds of custom-engineered systems, structures and components to the operating nuclear plants every year. That every one of them has performed its intended function without a single incidence of failure is an unheard-of record of flaw-free supply that stands unblemished since the company's founding in the 1980s. Despite the vast quantity of equipment delivered to the industry, there has not been a single instance of a defective or non-conforming SSC delivery resulting in 10 CFR filing to the NRC.

[Compare it with Oscar Shirani's whistleblowing. He discovered flaws in Holtec's neutron shielding in dry casks and/or transport casks, in the mid to late 1990s. Holtec had to correct the flaw.

Later, in the late 1990s/early 2000s, Shirani and Landsman found serious QA violations with the design and fabrication of Holtec high-level radioactive waste storage and shipping containers. Holtec has largely to entirely gotten away with all that though, thanks to NRC's complicity and incompetence.

Holtec's statement above is thus false.]

"Pages 20 to 21 of 42" (pgs.22-23/42 on PDF counter)

Unparalleled Licensing experience

[yet it lacks the needed licenses for operating Palisades, and it has no reactor operating experience]

"Page 21 of 42" (p.23/42 on PDF counter)

Table A

[Compare to Shirani revelations]

“Page 22 of 42” (p.24/42 on PDF counter)

11. An unblemished record of nuclear quality assurance: Holtec’s nuclear quality assurance, approved by the US NRC and in continuous service since 1986, has undergirded the Company’s design, manufacturing and supply of thousands of pieces of capital hardware delivered to the company’s global customers. In this long record of supply of nuclear grade equipment and systems, there has been not a single instance a defective or non-compliant delivery subject to 10CFR21. It is fair to assert that no nuclear reactor supplier has even a fraction of range and depth of Holtec’s track record of QA compliance.

[Again, very thin ice here. Compare Shirani allegations. What about San Onofre near-drop of loaded canister — wasn’t this a QA failure of design and operations?!!]

...stockholder equity...

[Isn’t Holtec 100% privately held? It has shareholders?]

No history of defaulting on any project;

[Well, it hasn’t delivered on decommissioning at Palisades; compare near-abandonment of project at Chernobyl, as well as failure to break ground at PFS, LLC CISF in Utah.]

Industry leader in worker safety:

[What about dousing and dosing of worker at Oyster Creek, as but one example?]

Cybersecurity

...a continuous onslaught on our digital infrastructure by malevolent state and non-state actors, mostly overseas based...

[What an admission. Cyber attackers only have to win once.]

15. Industry leader in Social and Environmental justice: The most enduring evidence of Holtec's unflagging commitment to social and environmental justice is the Company's 52-acre 312-million-dollar technology campus built on heavily contaminated land in 2017 in Camden, NJ, which is one of America's poorest cities. Through a relentless continuous campaign of recruitment and training, Holtec's workforce at the Camden Campus is the most diverse of any major nuclear company in America. A parallel initiative to promote diversity in the supply chain has yielded similar outcomes

[Singh insulted his own African- and Puerto Rican-American workers at that very location with racist tropes, leading to protests at the front entrance, as by the NAACP!]

Demonstrated corporate passion for delivering clean energy solution to a carbon-menaced world

...Over half a billion dollars of self-funded R&D to develop SMR-160 will forever stand as a material proof of our commitment to our cause and the purely (sic) of our purpose.

[They sure do like to toot their own horn. Never mind that nuclear power inherently violates EJ, at most stages of the uranium fuel chain.

But the self-aggrandizement is not without typos — such as purely instead of purity. But there have been many typos.]

“Page 24 of 42” (p.26/42 on PDF counter)

AMD will play a major role in this project as the manufacturer of the capital equipment needed to rehab Palisades

[Holtec's vertical integration means it will make the large amounts of money required to plug tubes, or entirely replace the steam generators.]

“Page 25 of 42” (p.27/42 on PDF counter)

C.1. Attachment C: Greenhouse Gas Emissions Data Worksheet

[Of course, renewables plus storage, and efficiency, could do the same job, only much more quickly, and much more cost-effectively. And oh yes, much more cleanly, safely, and securely.]

Relatively clean natural gas

[That's very debatable. What about methane releases from fracking alone, not to mention fracking's harm to groundwater, let alone the ultimate greenhouse gas emissions from burning natural gas?]

Assumed Year 1 at 95% capacity, Year 2 at 80% due to the refuel and Year 3 back to 95% and so on for calculating the total megawatt hrs

[What about unexpected breakdowns, including major ones, at the severely age-degraded Palisades reactor?]

SECTION D: LEGAL AND REGULATORY APPROVAL

D.1 Timelines for Regulatory Approval

Regulatory approval will be needed in 12 months after submission of the LAR to support restart in July 2024.

[Granted, there has been a major delay because DOE rejected Holtec's application on Nov. 18, 2022. BUT, it gives an idea of timing -- Holtec applied last week for initial reversal of shutdown status. So if Holtec's words above are accurate (always very dubious to assume Holtec's honesty or truthfulness, ever), then its predicted schedule for regulatory approval from NRC would now be late September 2024. unless they contradict themselves elsewhere -- including in this very same document?!

Unless of course what they mean by LAR above is not the initial step last week, but rather the all-smashed-together, multi-pronged LAR, in the words of the NRC staffer on Oct. 3, 2023.

Actually, on Oct. 3, 2023 in its meeting with NRC, Holtec seemed to suggest that August 2025 was its new target for actual restart of Palisades. At least, that is how Holland Sentinel and other news coverage interpreted it.]

D.2 Estimate of the Number of Construction/Permanent Jobs

Resurrection of Palisades will increase plant staff by approximately 400 persons from current shutdown levels. Total operating staff is approximately 650 individuals. Additional approximately 500 construction and support jobs will also be required over the two years

estimated to prepare for the restart. A number of the jobs will be filled by bargaining unit personnel

[Holtec 10/3/23 slideshow contradicts this. It says 500 jobs altogether, so adding only 280 to the current ~220 employees on-site. \$3.3 billion in federal and state bailouts means a cost of nearly \$12 million per restored job!]

“Page 26 of 42” (p.28/42 on PDF counter)

SECTION E: APPLICATION CHECKLIST SUBMISSION

As stated earlier, Palisades shut down operation on May 20, 2022. The ownership transfer to Holtec was completed on June 28, 2022, and this application deadline is July 5, 2022. We have endeavored to provide as complete of an application as possible, however much of the data requested in the application tables which applies to an operating plant is not currently available. The Application Checklist tables from the DOE website for this program were copied into this document to be able to constitute an application with known omissions clearly made visible to the staff. Also, certain specific financial historical information is unavailable and was not provided as part of the ownership transfer process.

[If DOE’s deadline was July 5, 2022, then this woefully incomplete application should have been rejected — and was. But Holtec then applied again later, or else intends to. (Given all the secrecy, it is impossible to keep track of where things are at.) Despite Palisades — a closed reactor — still being ineligible for CNC funding, despite DOE’s illegal revised guidelines.]

“Page 27 of 42” (p.29/42 on PDF counter)

NRC License number DPR-20

[Yes, but it is possession only. Holtec is trying to reverse permanent shutdown, and NRC seems only too happy to comply.]

A copy of the Nuclear Reactor’s federal license. A copy of DPR-20 will be provided at a later date

[Holtec could not meet even such basic requirements of the 7/5/22 deadline!]

The Palisades reactor has already been shut down on May 20, 2022.

[This is why Palisades is not eligible for CNC funding. It is meant for reactors about to close, to prevent it. It is not meant for closed reactors, to bring them back into operations. DOE's illegal guidelines to the contrary notwithstanding.]

\$412,552,188 (2021 Full calendar year; Power Purchase Agreement with prior owner)

[A PPA is not a competitive market. Consumers Energy spokesman quoted by Kelly House with Michigan Bridge that the 2007-2022 PPA was at times 57% above market rate. That annual revenue amount is equal to \$34,379,349 per month; \$7,933,696 per week; or \$1,130,280 per day in revenue. Of course, Palisades' benefit was ratepayers' burden, overly burdensome. A wealth re-distribution mechanism, up to Palisades' owner. Exorbitantly priced electricity. And also very high risk to health, safety, security, and environment.]

The project award is contingent upon applicant negotiating a suitable PPA with MSPC.

[Wolverine and Hoosier rural electric co-ops announced on 9/12/23. But has MPSC approved the PPA yet? If not, by when will this happen?]

“Page 28 of 42” (p.30/42 on PDF counter)

Narrative description with references to supporting documentation and economic calculations that clearly and in detail identifies the basis for the projection that the Nuclear Reactor is projected to cease operations due to economic reasons as described in Section VII.B

The Palisades reactor has already been shut down on May 20, 2022

[This difference in verb tense is the problem — Palisades is not eligible, because it is a closed reactor]

Historical Annual Costs for Previous Five (5) Years

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility.

Estimated Year 1 (2021) \$119M
Estimated Year 2 (2020) \$TBD
Estimated Year 3 (2019) \$TBD
Estimated Year 4 (2018) \$TBD
Estimated Year 5 (2017) \$TBD

[The application form already requested it. But Holtec lazily states they'll track it down only if DOE really insists. DOE already insisted. Those were the rules/requirements. Holtec did not meet them by the deadline.

Did Holtec's responses to RAI's (Requests for Additional Information) provide such info. later? So the July 5, 2022 deadline didn't mean anything really? Maybe it did, since Holtec was rejected. Diablo got the funds in 2022. But Holtec seems to have applied again, for the funds in 2023 and/or 2024?]

(a.) A table of historical annual expenditures and revenues for the Nuclear Reactor for the previous five (5) years, with line items for categories as described in Section VII.B(i)

\$412,552,188 (2021 Full calendar year; Power Purchase Agreement with prior owner) Prior years are expected to be similar, but specific information is not available to new owner at this time.

{Emphasis and yellow highlight added}

[See yearly/monthly/weekly/daily break down, above, of how much gouging ratepayers benefited Entergy before, and presumably Holtec going forward.

There are a large number of responses following below where Holtec says Entergy has the info. And they couldn't get it yet. But what about deadlines?! Meaningless? Forgiven? Certainly second bite at the apple possible in 2023, now.

They were lucky enough to have a retained worker or two who recalled the past year's figures, but nothing before that, it seems.]

(b.) Annual electricity generation for the previous five (5) years, in units of MWh, as reported to the EIA on Form 923.

Specific information not available at this time. Plant generating capacity is approximately 810MWh with assumed capacity factor of 85% and 95% depending on outage schedule

[This application was very incomplete, missing even the most basic info. as this. And, as noted above, Holtec can't seem to decide the MWe figure for Paliades. Here it is 810. Elsewhere it is 805, or 840, or 800! This is a basic figure to get straight!]

“Page 28 to 29 of 42” (p.30-31/42 on PDF counter)

(c.) Number of planned and unplanned outages over the previous five (5) years along with duration of each outage.

Estimated Year 1 (2021): 0 day Planned and 0 day Unplanned
Estimated Year 2 (2020) 0 day Planned and 0 day Unplanned
Estimated Year 3 (2019) 0 day Planned and 0 day Unplanned
Estimated Year 4 (2018) 58 day Planned and 1 (3 day), 1 (4 day) Unplanned
Estimated Year 5 (2017) 27 day Planned and 0 day Unplanned

[That may be accurate, maybe not — would have to check. But prior years — post-Fukushima, the 1970/1980s, Palisades was a real lemon, down a lot! Many unplanned outages, and many prolonged “planned” outages. At times one of the very worst capacity factors in the entire US commercial nuclear fleet. Conveniently forgotten about now by restart proponents.]

“Page 29 of 42” (p.31/42 on PDF counter)

(d.) A calculation of historical annual net operating gain or loss over the previous five (5) years in \$/MWh, using the revenue and cost data provided in point (a) and the generation from point (b)

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility.

{Yellow highlight added}

[The form required this info. Holtec just didn't feel like tracking it down by the deadline, so submitted a very incomplete application — reason alone it should have been rejected, and it was. Of course, Palisades is also ineligible for CNC funds. It is not operating nor operable.]

Projected Annual Operating Loss Over the Award Period

Under the previous owners PPA, annual revenues were \$412,552,188 in 2021. Under the terms of the same agreement, with an identical capacity factor, a two-year period (with no revenue) to resurrect the plant would generate a loss of double this amount, or approximately \$825M.

[\$825 million is a huge loss. It will be even more now, given year or longer added delay associated with DOE rejecting Holtec's 7/5/22 application for CNC funding. But nothing \$3.3 billion of free money — from unwitting taxpayers at the federal and state levels — can't fix. Then there is the gouge on its own ratepayers Holtec Palisades has to look forward to, generating \$412.5 million per year.]

Projected annual generation in MWh for the Award Period.

Following resurrection and NRC relicensing, it is assumed that plant will operate in similar manner to that of previous owner.

[Optimistic assumptions. What about breakdowns, especially major ones, at this more than half-century old reactor?]

Projected planned and unplanned outages assumptions.

The plant will effectively be in a 2-year outage as the relicensing and capital improvement processes are undertaken.

[Holtec re-casting permanent shutdown as a years-long outage. Add another year or longer of delay after this application was rejected by DOE on Nov. 18, 2022. So that is a 3+ year outage.]

Projected annual revenues in total dollars for the Award Period.

Specific details are not available as a new PPA has not been negotiated. Assume that the agreement will be at a minimum, similar to previous PPA, therefore assume a minimum of \$412.5M

{Emphases and yellow highlight added}

[Optimistic assumptions, but Holtec has announced PPA with Wolverine and Hoosier. So PPA will be another gouge on ratepayers, up to 57% above market rates. Holtec, saying “a minimum of,” hopes the PPA gouge will be even larger than that enjoyed by Entergy from 2007-2022.]

Projected annual costs in total dollars for the Award Period.

Following the 2-year period of investment detailed in Section 2, it is assumed that annual cost will be no more than \$119M incurred in 2021 by previous owner

[Again, non-conservative assumptions. What about breakdowns, including major ones? Looks like no plans for major repairs/replacements. They haven't even adjusted for inflation.]

Projected annual going-forward capital costs, depreciated consistent with GAAP.

Information not available at this time

{Yellow highlight added}

[Application incomplete]

Identification and estimates of the portion of projected costs that are avoidable by retirement.

Not applicable as plant has been shut down

{Yellow highlight added}

[Which is why Palisades is not eligible for CNC funding; so retire it as planned!]

Projected monetized annual operating and market risk in dollars.

Information not available at this time

{Yellow highlight added}

[Application incomplete]

“Page 30 of 42” (p.32/42 on PDF counter)

A detailed narrative explanation, including supporting workbooks and calculations, of how the costs of operational and market risks were calculated for each Award Year of the Award Period.

Information not available at this time

[incomplete]

Supporting workbooks and calculations for above narrative

[Although the response to this particular line was left blank, Holtec's follow on responses in this section often state "Information not available at this time," or something along these lines. Thus, application was woefully incomplete.]

Projected average annual operating loss over the Award Period.

\$825M

{Yellow highlights added}

[Those are some huge annual losses. They simply multiplied the \$412.5 million revenue from the 2007-2022 PPA gouge of ratepayers, by the number of years in permanent shutdown mode. This is lowball, as DOE's 11/18/22 rejection of this 7/5/22 Holtec application for CNC funding has prolonged the pre-restart period by at least a year, if not longer.]

Copies of any analysis, presentations, or assessments of past or projected financial performance of the Nuclear Reactor from the previous five (5) years.

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility

{Yellow highlight added}

[Application incomplete. Holtec will only provide required documentation if DOE really insists upon it.]

Identification and description of any obligations or commitments the Nuclear Reactor has operated in the past five (5) years and/or currently operates in any relevant RTO/ISO markets.

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility.

[Application incomplete. Holtec will only provide info. If DOE insists upon it.]

A list of all active and anticipated contracts for capacity, energy, ancillary services, or environmental attributes and/or energy supply by the Nuclear Reactor

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility.

[Application incomplete. Holtec will only provide information if DOE really demands it do so.

Holtec should have planned ahead, and so too other restart proponents, as NRC Commissioner Crowell himself pointed out. They let the institutional memory walk out the door in May and June of 2022.]

“Page 30 to 31 of 42” (P.32-33/42 on PDF counter)

Annual average Nuclear Reactor bid price in the annual capacity auctions over the previous five(5) years in \$/MW, including all capacity auction bids by year and any cost data submitted to the relevant RTO/ISO and relevant RTO/ISO Independent Market Monitor as part of a unit-specific review process.

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility.

[Application woefully incomplete. Holtec will only provide documentation if DOE demands it.]

“Page 31” (p.33/42 on PDF counter)

Supporting cost data for above.

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested.

Where possible estimated were made using the existing plant staff who ran the facility.

[Application incomplete. Holtec will only provide information if DOE really demands it do so.

Holtec should have planned ahead, and so too other restart proponents, as NRC Commissioner Crowell himself pointed out. They let the institutional memory walk out the door in May and June of 2022.]

A list of all data provided by the Applicant and related to the Nuclear Reactor to the FERC and NRC over the past five (5) years

Information not available as information would be held by prior owner

[Application woefully incomplete.]

A list of all audits performed on the Nuclear Reactor by internal employees, commissioned or performed by any governmental agency in the previous five (5) years.

Information not available as information would be held by prior owner

[Application incomplete. But as Holtec admitted above, since Palisades was shutting down for good, many inspections were simply never carried out.]

A statement of all assumptions used in the revenue and cost projections for the Nuclear Reactor, including projected electricity market prices, forward and futures market prices, and a description of any differences.

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility.

[Application incomplete. Holtec will only provide information if DOE really demands it do so.

Holtec should have planned ahead, and so too other restart proponents, as NRC Commissioner Crowell himself pointed out. They let the institutional memory walk out the door in May and June of 2022.]

Additional Calculations and Documentation for State-Supported Reactors

Information not available as information would be held by prior owner

[Application woefully incomplete]

A description of and citation to the state statute, regulation, or public contract that describes how payments from state programs would be reduced or replaced entirely if the Nuclear Reactor is allocated Credits.

The financial information requested was held by the previous owner and is not currently available. We will endeavor to acquire this information from the previous owner if requested. Where possible estimated were made using the existing plant staff who ran the facility.

[Woefully incomplete application. But note yellow highlights above. Not only would payments from state programs not be reduced or replaced entirely if CNC funding was awarded. Rather, the state bailout for restart of \$150-300 million will not be dispersed unless and until the federal funding is awarded. The state bailout is brand new, and contingent on the DOE funding. If the CNC rules hold that state funding must be reduced or replace entirely if CNC funding is awarded, then Palisades has fallen afoul of such requirements. Also, if state laws or regulations prohibit Palisades from receiving both state bailouts and CNC bailouts, the same would be true. See immediately below.]

“Page 32 of 42” (p.34/42 on PDF counter)

A recalculation of the Nuclear Reactor’s projected average annual operating loss as described above, with the payments from state programs appropriately reduced or removed as defined by the applicable state statute, regulation, or public contract.

This information cannot be calculated at this time

[Application woefully incomplete. And, as mentioned immediately above, if state laws or regulations prohibit Palisades from receiving state bailouts, as well as CNC bailouts, then this has been violated.]

Other Economic Factors Relevant to Reactor Retirement

The plant has already been shutdown

[Exactly. Retire it as planned! It is not eligible for CNC funds.]

The remaining useful life of the generating Nuclear Reactor

In 2007 the NRC granted a license extension to the plant operate until 2031.

[That does not mean it is safe, far from it. And Holtec has clearly indicated it is going for 80 years, out to 2051. It intends to sail ever deeper into uncharted risk territory. And NRC will, no doubt, be fine with that.]

Supporting financial modeling for above.

Information on any planned license extension requests for the Nuclear Reactor, including any financial modeling done in association with such planning.

In 2007 the NRC granted a license extension to the plant operate until 2031. New owner assumes that prior owner did not plan to apply to extend license an additional 20 years (until 2051) based upon 2018 decision to shutdown

[Why does not Holtec just ask Entergy, instead of assume? They have their number. Could not possibly have anything to do with safety risks, right? Holtec will apply for 80 years. Holtec will boldly go where no one has gone before. Foolhardy. Placing us all in ever more peril.]

Estimates of the costs that would be incurred by the Applicant to shut down the Nuclear Reactor, including identifying the portion of those costs that would be funded by the Nuclear Reactor's nuclear decommissioning trust funds and those that would be funded by the Applicant.

The reactor has already been shut down and funds have been used from the NDT consistent with regulatory requirement which limit spending for decommissioning planning and shutdown to no more than 3%.

[That may have been true on July 5, 2022. But by Dec. 31, 2022, \$44 million had been spent, approaching 10% of the DTF. But little to no decommissioning was accomplished despite the huge expenditures, as late as March 20, 2023. Actually, Holtec re-affirmed little to no decommissioning has taken place, at its Oct. 3, 2023 meeting with NRC.]

Demonstrate the impact on ownership and Applicant's earnings during each of the next four (4) years, assuming the Nuclear Reactor shuts down. Include any financial impact(s) to the parent organization. A description demonstrating the impact on ownership and Applicant's earnings during each Award Year during the Award Period, assuming the Nuclear Reactor ceases operations. Include any financial impact(s) to the parent organization.

The reactor has already been shutdown

[Which is why it does not qualify for CNC funds.]

A description of the current status of the nuclear decommissioning trust fund for the Nuclear Reactor, including any shortfall of decommissioning funds resulting from the Nuclear Reactor's early retirement.

The current value of the nuclear decommissioning trust fund is approximately \$552M on June 28, 2022, the date of ownership transfer. This amount is deemed sufficient to decommissioning the plant according to Holtec's published decommissioning plan.

[Not true, according to MI AG Nessel's office. She sees a \$200 million shortfall. We'd say more like \$500 million shortfall, if comprehensive decommissioning were actually done — perhaps even more, depending on how bad radioactive contamination is.]

That does not include contamination, etc. from zombie reactor restart, nor new SMRs. New waste and contamination would exacerbate the DTF shortfall even more. And Holtec does not plan to put a single penny into the DTF, just as Entergy did not. How could the MPSC sign off on such abuse in 2007, and again now?!

“Page 33 of 42” (P.35/42 on PDF counter)

Copies of any decommissioning activity reports filed with the NRC.

Both the prior owner and current owner have filed Post shutdown Decommissioning Activities Reports (PSDAR's) with the NRC. Prior owner filed numerous exemption requests consistent with standard nuclear industry shutdown planning. Copies of these documents are not included with this submission but can be provided at a later date if desired.

[Holtec is very lazy. They admit they have the documents requested/required. DOE has requested the docs as part of the application for billions of dollars of taxpayer money. Holtec doesn't feel like providing the docs by the deadline however. So if DOE really wants them, Holtec says it can provide them later! What about the deadline? Is it meaningless? Perhaps not — DOE rejected this application.]

Holtec's PSDAR is bogus, of course. It was part of a bait and switch trick to acquire Palisades. Holtec did not intend to decommission Palisades. A mere five days after taking over Palisades, it applied to DOE for CNC funding to restart — not decommission — the reactor. Of course any

date-certain(s) in the PSDAR are now moot. So too the cost figures — any future reactors operations (at zombie reactor, or SMR new builds) will significantly exacerbate decommissioning costs. Nessel already called out Holtec on its Dec. 23, 2020 PSDAR — it was already at least \$200 million short then!

Entergy's exemption requests must now all be undone or revised. As NRC Crowell asked in Feb. 2023, why didn't reactor restart proponents plan ahead?! What an absolute waste of time, energy, and money such lack of planning has caused! Holtec's lack of advance planning bodes ill for health, safety, security, the environment, and public pocketbooks, in the context of restarting a dangerously age-degraded reactor, and building new SMRs at Palisades, as well.]

Identify and describe all of the Applicant's commitments and obligations to the NRC that would be required in advance of a unit shutdown.

All NRC commitments and requirements have been made by previous owner to shut down the plant.

[To quote Harry Truman, "The buck stops here." Holtec has to live up to all commitments made by Entergy at Palisades. That's how it works. Holtec has inherited those commitments. But here Holtec appears most uninterested in those commitments, like they have nothing to do with them, they do not apply to them. This is not only outrageously wrong, a violation of law and regulation, but it is also very frightening re: safety, etc.]

Indicate the earliest date the Applicant could access decommissioning trust funds in excess of 3 percent for the Nuclear Reactor.

The decommissioning trust can be accessed for amount greater than 3% of the DTF 90 days after permanent cessation of operations which is August 20, 2022. The DTF is currently being used to fund staff since the plant has ceased operations and is now in a decommissioning status.

[Holtec could only spend, at most, 3% of the DTF in the first 90 days. Above, Holtec reported \$552 million in the DTF on 6/28/22. So, 3% of \$552 million is \$16.56 million. Which means that between August 20, 2022 and December 31, 2022, Holtec likely spent another \$27.44 million from the DTF. (\$16.56 million + \$27.44 million = \$44 million, the amount reported by Holtec on 3/31/23, for Palisades DTF expenditures from June 28 to Dec. 31, 2022. \$27.44 million spent from the DTF over just 4 months and 11 days equals (133 days to be precise) equals \$206,315 spent per day on decommissioning, even though Holtec has admitted repeatedly that little to no decommissioning was taking place, nor is now.

Note that we have a different figure for the status of the DTF on 6/28/22 — \$487 million. Which is it, the \$552 million reported by Holtec above, or the \$487 million reported elsewhere?

Holtec sure is chomping at the bits to get access to the DTF, isn't it?! And once it was able to, it began spending DTF money at a high rate of speed — from June 28, 2022 to Dec. 31, 2022 alone, Holtec spent a whopping \$44 million. On WHAT, is the question, because Holtec has repeatedly — even on Oct. 3, 2023 — admitted it has done little to no decommissioning work! But the yellow highlight above seems to clearly indicate that if anyone, of the around 220 employees at Palisades, has anything to do with the restart scheme, the payment for their restart scheme work is coming out of the DTF. And it seems undeniable that at least some of those ~220 employees are working/have worked on the restart scheme — because Holtec has also admitted, Palisades is being kept at a ready-as-possible-to-restart state. In other words, no irreversible decommissioning work in being done. If those ~220 employees, or some sub-set of them, is not working on restart, then what ARE they working on? Holtec can't say the \$44 million was spent on transfer of irradiated nuclear fuel from pool to dry cask, because that has not happened. And any spending on site restoration would also be an objectionable waste, as they are going to restart the old reactor, and build new SMNRs, so any such expenditures would be entirely wasteful.]

Indicate the earliest date the Applicant could, realistically shut down the Nuclear Reactor per NRC, relevant RTO/ISO, or other commitments and obligations.

Palisades was shutdown permanently on May 20, 2022

[Which is why Palisades is not eligible for CNC funding — it is not operating, nor operable. Recall above — Holtec and Consumers Energy are intentionally, secretly evading MISO regulatory requirements re: switchyard!]

Emissions Impact

(a.) A quantitative estimate using EPA's eGRID of total emissions (in tons) of each Air Pollutant in the eGRID subregion where the Nuclear Reactor is located. Three (3) years of annual estimates must be provided for the years 2018– 2020 for CO₂, NO_x (annual), NO_x (ozone season), SO₂, CH₄, and N₂O and one (1) year of annual estimates for the year 2018 must be provided for PM_{2.5} as described in Section VII.C.

Specific calculations using eGRID are not available, however, a rough estimate of avoided gaseous pollution using eGRID has been calculated and is shown in a table in section C.1. The table portrays a mitigation of 9 million tons of CO₂ avoided. The other pollutants are addressed as well.

[Half-baked to the point of incompleteness — yet this application is for “roughly” \$2 billion of federal taxpayer money!]

(b.) A quantitative estimate using EPA's eGRID of total emissions (in tons) of each Air Pollutant at the plant level for the Nuclear Reactor.

This estimate not available at this time

[Woefully incomplete application.]

(c.) A quantitative estimate using EPA's eGRID of output emission rates (in lb/MWh) for CO₂, NO_x (annual), NO_x (ozone season), SO₂, CH₄, and N₂O for all fuels for the eGRID subregion where the Nuclear Reactor is located for the years 2018, 2019, and 2020.

This estimate not available at this time

[Woefully incomplete application.]

“Page 34 of 42” (p.36/42 on PDF counter)

(d.) A quantitative estimate using EPA's eGRID of output emission rates (in lb/MWh) in eGRID for PM_{2.5} for all fuels for the eGRID subregion where the Nuclear Reactor is located for the year 2018.

This estimate not available at this time

[Woefully incomplete application.]

(e.) The Facility ID, Plant State, eGRID subregion, and Total Generation (in MWh) at the plant level for the Nuclear Reactor for the years 2018, 2019, and 2020.

This information not available at this time

[Application woefully incomplete — Holtec can't or won't even provide the most basic info. Very lazy.]

(f.) A quantitative estimate of historical annual emissions of each Air Pollutant should the Nuclear Reactor have ceased operation, calculated by multiplying the output emission rates in

(c.) or (d.) by total generation in (e.) for the Nuclear Reactor for each year of requested data in (a.) – (e.) for the specific Air Pollutant.

This estimate not available at this time

[Woefully incomplete application.]

(g.) A quantitative estimate for each Air Pollutant of future emissions should the Nuclear Reactor cease operation defined as the product of the annual emission rate for each Air Pollutant averaged across three (3) years from (c.) or the 2018 annual emission rate for PM2.5 from (d.) multiplied by annual projected generation for the next four (4) years (i.e., four annual estimates for each Air Pollutant) of the Nuclear Reactor as requested in Section VII.C.

This estimate not available at this time

[Woefully incomplete application.]

Replacement Generation

Provide a narrative, with supporting data if available, discussing which generation assets would be likely to fulfill the capacity and energy requirements currently served by the Nuclear Reactor if the Nuclear Reactor were to shut down. Compare and describe any differences between the expected replacement generation emissions rates with the historical emissions rates reported in 1c above. Include consideration of known or expected future capacity additions in the relevant eGRID region, Federal and applicable regional, state, and local energy policies, as well as anticipated market trends, which may result in increased clean energy supply, energy efficiency, and electrification. Include assumptions, supporting data, and source information

Prior to the Palisades shutdown, the MPSC approved an integrated resource plan to ensure ongoing electrical generation in the State of Michigan. This plan also included assumption that clean energy projects would be initiated and brought to the grid in the future. As the Palisades shutdown had been factored into this Integrated Plan, resumption of operations would fulfill the plans vision to add additional clean energy to the grid at points in the future.

[Holtec admits that MPSC IRP does not Include Palisades. But if Palisades gobbles up \$3.3 billion in bailouts, and gouges ratepayers on the new PPA to the tune of \$412.5 million per year, then renewables, storage, and efficiency will be harmed, given the competitive advantage enjoyed by Palisades. The opportunity costs are outrageous, as is the unfair advantage Palisades has long enjoyed (identical PPA from 2007 to 2022, blessed by MPSC, and enjoyed by Entergy).

The reason for the massive bailouts is Palisades can't compete. That, and DOE's et al.'s over the top pro-nuclear agenda, Holtec's insatiable greed, etc. Risks to health, safety, security, environment, and pocketbook be damned. They don't even acknowledge these risks. Also, Holtec and Consumers Energy blocking renewables' access to grid at Palisades, per above?!]

"Page 35 of 42" (P.37/42 on PDF counter)

Other Supporting Data

Provide a list of submissions of data and documentation provided by the Applicant and related to the Nuclear Reactor and its surrounding property to state and Federal regulators, including permits, permit violations, enforcement actions, outstanding environmental compliance requirements, and remedial actions planned, ongoing, and completed over the past five (5) years to demonstrate that all standards and requirements are being met. DOE may require additional documentation of the Applicant.

Specific details are not available at this time

[Incomplete. Weak. Lazy.]

Uranium Fuel and Source

Specific details are not available at this time.

[Wow. What an admission. Holtec doesn't even know where it will get its uranium fuel from! Unable to answer such basic questions, Holtec had no right to apply for this money on 7/5/22! What a bad joke!]

Post-Award Period Operations Plan

A narrative description of the Applicant's plan to sustain operations in the Post-Award Period (I) without receiving additional Credits; or (II) with the receipt of additional Credits of a lower amount than the Credits allocated during the Award Period. Applicant's analysis should be consistent with the economic factor calculations submitted in accordance with Section VII.B.

It is assumed that following the investment required to relicense the plant, that the PPA with the MPSC would be sufficient to operate the plant economically without additional credits.

[Once Holtec is done mugging federal taxpayers and state taxpayers to the tune of \$3.3 billion, with complicity from DOE and State of MI, then it will turn to mugging ratepayers at Wolverine and Hoosier, via the PPA. What a great country to restart zombie reactors in! Legalized robbery. When these federal and state agencies — DOE, NRC, State of Michigan, MPSC — are supposed to serve the public. Yes, in the sense of serving them up for dinner, to Holtec at Palisades! It's corporate welfare as far as the eye can see at Palisades. Is that state and federal governments' proper roles — to bailout an uncompetitive company like Holtec at Palisades, with many billions in handouts, and several hundred million per year in overpriced PPA electricity?! Not in a free market capitalist system, that's for sure!]

Estimate of revenue in \$/MWh that the Nuclear Reactor must achieve to sustain operations in the Post-Award Period given forecasts of future market conditions in the absence of additional Credits.

Information not available at this time

[Lazy. Weak. Incomplete. Ridiculously so. Holtec does not plan to compete on the open/free market. It plans on gouging taxpayers and ratepayers. Re: taxpayer bailouts, it needn't even restart Palisades at all. It could just pocket the \$3.3 billion, and never even restart Palisades.]

Any existing policy barriers that prevent the Applicant from making changes to its business model or operations that would otherwise contribute to the Nuclear Reactor's ability to sustain operations after the Award Period

Provided the investment is sufficient to complete the operational and capital program, the owner is not aware of any existing policy barriers that would prevent sustained operation post award.

[Now that free market capitalism and competition — such as renewables, storage, and efficiency — have been removed, Holtec sees nothing but smooth sailing ahead, albeit ever deeper into uncharted risk territory for health, safety, security, environment, and public pocketbooks. Unfair competitive advantage bought with \$3.3 billion in public bailouts.]

Workforce and Labor Considerations

A written narrative describing workforce development and retainment efforts, as well as labor engagement, as described in Section VII.G

Palisades has existing collective bargaining agreements with the USGOS, Utility Workers of America and the building trades.

[Tony Mazzochi, leader of the Oil, Chemical, and Atomic Workers Union (OCAW), told me in 1997 that the nuclear power labor unions are complete sell outs. They would do management's bidding even if it harmed their own health. This was at Helen Caldicott's gig in NYC Academy of Medicine, where he was a keynote speaker, along with Alice Stewart and Karl Morgan.

Per my commentary above, note that all of a sudden, on Oct. 3, 2023, at meeting with NRC, Holtec abruptly lowered the previous number of anticipated Full Time Employee jobs from 650 down to 500. That would mean just 280 or so restored jobs, plus the ~220 current employees. Costing \$3.3 billion in government bailouts to accomplish, this would cost nearly \$12 million per restored job, an absurdly high and wasteful figure.]

A Diversity, Equity, Inclusion, and Accessibility plan with clear milestones that align to the Award Period.

This will be provided if needed at a later date.

[Why wasn't it provided by 7/5/22. Holtec attempted to flaunt the deadline, make a mockery of it.]

Community Engagement and Impact

A written narrative describing community engagement efforts and impact, as described in Section VII.H.

Palisades maintains contact with the established citizens boards already established in the area and attends or hold meetings quarterly.

[The Palisades Community Advisory Panel is a front group for the Van Buren County Chamber of Commerce and Market Van Buren. Pro-Palisades on steroids. A total bad joke. Totally orchestrated. Little to no genuine community engagement. Pro forma. Going through the motions. Conclusions/outcomes pre-determined. A kabuki dance. Total waste of time and energy. A red herring to keep us distracted. Machiavellian. Pretending to watchdog decommissioning, while pushing for restart — albeit secretly — the whole time. Plus, the meetings have been suspended many months ago, even more than a year ago, so Holtec's answer above is not correct — there are no longer regular quarterly meetings taking place.]

Worker and community transition plans to prepare for the eventual closure of the plant

Palisades is now shut down and the transition has been completed. This proposal contemplates resurrection of the plant to extended 20-year operation at full power.

[The transition plan was/is to not transition. To never transition. To operate Palisades till the worst happens, or the world ends, or whichever comes first. The one may mean the other, at least for the region out to a certain large distance, as at Chernobyl. Covert, South Haven, Van Buren County, etc. have been addicted to Palisades' money for 60 years — they plan to keep on being addicted for another several decades, the risks to health, safety, security, environment, and public pocketbooks be damned. They don't even acknowledge, or perhaps they don't even care, about those risks. When society becomes an addict. Sometimes century-long benders don't end well for the addicted or those around them.]

“Page 36 of 42” (P.38/42 on PDF counter)

Credit Redemption Agreement

This will be provided if needed at a later date.

[Incomplete. Holtec makes mockery of and flaunts deadline. They don't feel like submitting it now — and besides, there is no time to do so.]

“Page 37 of 42” (p.39/42 on PDF counter)

SECTION F: BID SHEET

General Instructions: Represent all costs in nominal dollars. Fill out a copy of the tables provided below

· For Nuclear Reactors with multiple units being considered at a single site, the Applicant may submit either individual bids for each reactor unit, or one combined bid covering both reactor units. Note that if submitting individual bids for each reactor unit, the auction may result in only some units being allocated credits.

[Note language. This CNC program is entirely geared to Diablo with 2 units, and Palisades with one unit. Nuclear power plants with 3 units, like Palo Verde AZ, Browns Ferry AL, etc. are not even on the radar screen. Unintended DOE acknowledgement of this rigged game.]

Table 1 in DOE's Bid Instructions

[What a revealing big picture chart!

A total of \$1.6 billion — yet another figure, follow the bouncing ball, follow the moving target — requested from DOE by Holtec in the form of CNC bailouts.

For \$800 million per year in CNC bailouts, Palisades would (after a one to two year delay!) generate 810 MW-e hours (they said 805 elsewhere — they can't even get that figure straight!).

Wow, that's some expensive electricity — but what does Holtec care? It's other peoples' money — taxpayers' and ratepayers' money.

Projected revenue — \$412 million per year, by gouging Wolverine and Hoosier ratepayers — talk about killing the family farm — what would Willie Nelson do?! John Cougar Mellencamp?!

\$788 million in major capital costs — but Holtec has said elsewhere, it will do all those in-house, such as steam generator tube plugging or entire replacement — so all this money will go into its pockets as well. No mention whatsoever of lid (reactor vessel closure head) replacement, embrittled reactor pressure vessel annealing. And what about CRDM seals? Many, to most, to all of these risks will simply be allowed to continue and worsen — run it into the ground has been Consumer Energy, Entergy, and now Holtec's business model. Come what may. Risks be damned.]

“Page 38 of 42” (p.40/42 on PDF counter)

Table 2: Average bid price and estimated operating loss (From DOE's Website)

[Talk about incomplete.

Two entries merely state:

The information requested is currently unavailable. This proposal contemplates a grant to resurrect Palisades which is a recently shut down nuclear plant.

One entry states:

Unknown, this information will be available once the fuel is purchased.

How can DOE judge the worthiness of the application then?

But of course, Palisades is not worthy — it is not eligible for CNC funding.

Two entries are entirely blank! Holtec didn't even bother to fill them in!]

“Page 39 of 42” (p.41/42 on PDF counter)

Bid Certification

(i) (I/We), _____, certify that the amounts submitted on the enclosed bid sheet have been arrived at independently, without, for the purpose of restricting competition, any consultation, communication, or agreement with any other Applicant or competitor relating to (i) those amounts, (ii) the intention to submit a bid sheet, or (iii) the methods or factors used to calculate the amounts submitted; (ii) The amounts submitted in the enclosed bid sheet have not been and will not be knowingly disclosed by the Applicant(s), directly or indirectly, to any other Applicant or competitor before bid opening unless otherwise required by law; and (iii) No attempt has been made or will be made by the Applicant(s) to induce any other entity to submit or not to submit a bid for the purpose of restricting competition. As the authorized representative(s) of the Applicant(s), (I/we) hereby certify, to the best of (our/my) knowledge and belief, the truth and accuracy of these statements and information provided above.

[signatures follow in the 967 page FOIA.

Competition? DOE is worried about competition? It is handing out billions of dollars of hard earned federal taxpayer money to uncompetitive nuclear power plants like Diablo and Palisades!

This may explain why Holtec, and Gov. Whitmer, waited till Sept. 9, 2022, to announce Holtec's bid for CNC funding — the filing and docketing deadlines had just passed. They probably, in coordination with DOE, did not want to attract any attention, till after the bid deadline was over — wouldn't want any pesky questions to be asked, or protests to be lodged, that might upset plans, schemes, deadlines...

Re: coordination with DOE, Office of Nuclear Energy director Dr. Kathryn Huff, in a meeting I attended with her in May 2022, confirmed that two were applicants for CNC funding at that time. Almost certainly, these would be Palisades and Diablo. But Palisades belonged to Entergy at that time. Was Holtec already scheming for restart, as early as May 2022, more than a month before it took ownership of Palisades? It would appear so.]

“Page 40 of 42” (p.42/42 on PDF counter)

APPLICATION CERTIFICATION

By signing this Certification Application, (I/We), _____ certify the statements contained in the Certification Application and any attachments herein are true, complete, and accurate to the best of (my/our) knowledge. (I/We) further certify that the submitted forecasts are consistent with market analysis, operations cost assessments, risk monetization and analyses, and other standards used in the standard business processes associated with the Nuclear Reactor. (I/We) (am/are) aware that any false, fictitious, or fraudulent statements or claims may subject the signatories of this document to criminal, civil, or administrative penalties per 18 U.S.C. § 1001. As the duly authorized representative(s) of the Applicant(s), (I/we) hereby certify, to the best of (our/my) knowledge and belief, the truth and accuracy of the statements provided above.

[Holtec does engage in fictitious financial statements — just ask the fired CFO turned whistleblower, Kevin O’Rourke.

Holtec does engage in false and fraudulent statements, even under oath. See Singh’s application for \$260 million tax break from State of NJ.]