

ENVIRONMENTAL COALITION COMMENTS ON NRC EA/FONSI RE: PALISADES REACTOR RESTART

COMMENTS ON: U.S. Nuclear Regulatory Commission and U.S. Department of Energy's (Cooperating Agency) Draft Environmental Assessment and Draft Finding of No Significant Impact for the Palisades Nuclear Plant Reauthorization of Power Operations Project; ML24353A157; NRC CEQ ID: EAXX-429-00-000-1734394646; DOE ID: DOE/EA-2285; Docket Number: 050-0255; Issued: January 2025, Draft for Comment.

Docket ID NRC-2024-0076

Submitted via email to: <PalisadesRestartEnvironmental@nrc.gov>

COMMENTS:

(1.) **We request that the NRC do an Environmental Impact Statement (EIS).** This Environmental Assessment is not sufficient. This closed-for-good-reactor restart scheme is unprecedented. It is unneeded. It is insanely expensive for the public: Holtec has requested a total of more than \$8 billion, and still counting, in federal, state, and ratepayer bailouts, and has already been awarded \$3.12 billion in hard-earned taxpayer money. Palisades Nuclear Plant's (PNP) restart is extremely risky for human health and the environment, as well as safety and security. A PNP reactor core meltdown is an existential risk for the Great Lakes, 21% of the planet's surface fresh water, 84% of North America's, and 95% of the U.S.A.'s, drinking water supply -- and so much more -- for 40+ million people in 8 U.S. states, 2 Canadian provinces, and a large number of Indigenous Nations. NRC's CRAC-II report (Calculation of Reactor Accident Consequences, also known as the 1982 Sandia Siting Study, or NUREG/CR-2239) predicted that a Palisades atomic reactor core meltdown would cause: 1,000 acute radiation poisoning deaths; 7,000 radiation injuries; 10,000 latent cancer fatalities; and \$52.6 billion in property damage. Population growth over the past four decades means casualties would now be even worse, as more people are in harm's way. Adjusting for inflation means property damage would now exceed \$168 billion, expressed in Year 2023 dollar values. PNP was a lemon from the start, and after more than a half-century of operations, is now dangerously age-degraded. Multiple safety-significant systems, structures, and components are at increasingly high risk of catastrophic breakdown, which could lead to a large-scale release of hazardous radioactivity into the environment: the worst neutron-embrittled reactor pressure vessel in the country, and perhaps the world, at risk of pressurized thermal shock through-wall fracture; steam generators and reactor vessel closure head that have needed replacement for two decades; sumps and strainers at risk of clogging and blocking emergency core cooling system flow; the worst Operating Experience with Control Rod Drive Mechanism seal leakage in industry; the list goes on and on. Holtec's neglect of vital safety maintenance since PNP's permanent shutdown has made matters even worse. For example, steam generator tube degradation accelerated dramatically from 2022-2024, because Holtec neglected to place them in chemically preservative wet lay up. The very significant impacts, and catastrophic risks, of this major federal action demand an EIS, in order to be compliant with the National Environmental Policy Act (NEPA). Once NRC publishes the requested EIS, **we request a comment period of six months**, in order to adequately address the large number of very significant impacts and risks of this major federal action.

Furthermore, we contest NRC's Finding of No Significant Impact (FONSI). Are NRC and DOE saying that the Great Lakes region, and the humans and other living things that call it home, are not significant? This is the only logical explanation for DOE and NRC's clearly erroneous FONSI, given the very large negative impacts on and risks to health, environment, and safety, that a restart of the Palisades atomic reactor would have.

(2.) In fact, **we request that a Programmatic EIS be performed, in order to comply with NEPA.** As stated by multiple public commenters at the environmental scoping public comment meeting convened by NRC and DOE at Benton Harbor, Michigan on July 11, 2024, since the precedent being set at the Palisades Nuclear Plant, in terms of closed for good atomic reactor restarting, a Programmatic EIS should be required. This lower-level EA is insufficient. Other permanently shutdown reactors already seeking restart permission from NRC, and very likely bailouts from DOE, other federal agencies, state governments, and/or ratepayers currently include: Three Mile Island Unit 1 in Pennsylvania (recently preposterously renamed the Christopher Crane Safe Energy Center, likely an effort to shed the radioactive stigma of Three Mile Island Unit 2's 50% meltdown on 3/28/1979, considered by many to be the worst reactor disaster in U.S. history; Duane Arnold in Iowa, which had a close call with meltdown in August, 2019, after major damage from a derecho, is not far behind. Additional "zombie reactors" in the U.S. include: Diablo Canyon Units 1 and 2 in California, surrounded by earthquake faults, which were supposed to close for good in 2024, and 2025, respectively; and Summer Units 2 and 3 in South Carolina, both abandoned midway through construction, in 2017, at a loss of more than \$9 billion to ratepayers. Given the precedent-setting nature of PNP's restart for all these other "zombie" reactors, with yet more possible in the future, a PEIS should be undertaken to comply with NEPA, and a six month public comment period set.

(3.) **The NRC and DOE EJ (Environmental Justice) analysis is deeply flawed, and its FONSI in grave error.** Communities with EJ concerns that would be impacted and put at risk by the Palisades atomic reactor restart, as well as the so-called Small Modular Reactor (SMR) new builds, include the large number of Indigenous Nations mentioned in the EA, including the Pokagon Potawatomi (centered in Dowagiac, Michigan), the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians (Gun Lake Tribe, based in Shelbyville, Michigan), and the Nottawaseppi Huron Band of the Potawatomi (located at the Pine Creek Indian Reservation near Athens, Michigan), to name but three. In addition to the radioactive risks imposed on Anishinaabe Aki (First Peoples Land) by the Palisades atomic reactor, there is also the high risk that new construction at the PNP site -- such as for radioactive waste storage, and SMR new builds -- will disturb or even destroy Indigenous burials or other cultural sites.

Other communities with EJ concerns at/near PNP include the African American population and low-income population of Covert Township, Michigan, where Palisades is located. The percentage of the population in Covert that is Black is significantly higher than the state and national averages. Covert also has a high poverty rate. This begs the question: if Palisades is so good for the economy, why is the poverty rate in its hometown so high?

Hazardous radiation releases from "routine" operations at PNP, and God forbid from a catastrophe, disproportionately impact population centers in Covert, including the 120-year old

Palisades Park Country Club resort community, immediately south of PNP, which reports a shockingly high number of thyroid cancer cases, a rare disease for which a single case would be unusual and alarming, as opposed to dozens reported, just among 200 households. That NRC, DOE, and even the Michigan Department of Health and Human Services seem to be willfully blind to such health impacts. Are the thyroid cancer cases even recorded in Covert, Van Buren County, and/or Michigan, or are they registered in the home town, county and state where PPCC residents spend most of the year? If this is the loophole being used to downplay thyroid cancer at PPCC, it calls to mind the phrase "Lies, Damn Lies, and Statistics." Such health impacts and risks also likely disproportionately impact the Black community in Covert Township, just a short distance away from PNP. This also threatens Covert's rich African American cultural heritage.

Similarly, Benton Harbor, Michigan, located midway between the Palisades and Cook nuclear power plants (about 15 miles from each), has a large percentage of African American residents, compared to the state and national averages, and also has a relatively high poverty rate.

Yet another category of communities with EJ concerns is the relatively large Latin American population of southwest Michigan, including seasonal/migrant workers, given the large concentration of agriculture in the region, as well as permanent residents.

Perhaps it should come as no surprise that NRC sees no disproportionate impact on EJ communities in southwest Michigan from the Holtec schemes. NRC came to the same conclusion in majority-minority (Latino and Indigenous) New Mexico, where Holtec wants to construct and operate the world's single largest high-level radioactive waste dump. Similarly, DOE sees no disproportionate impact on the Western Bands of the Shoshone Nation of Indians, whose land at Yucca Mountain, Nevada has not only been targeted for the national high-level radioactive waste dump, but has also been used for a very large number of nuclear weapons tests.

(4.) **Radioactive Waste concerns:** PNP already has more than 900 metric tons of irradiated nuclear fuel on-site, from 51 years of reactor operations. If restarted, PNP would generate around 15 metric tons more each and every year, from 2025 to 2051. Its SMR-300s would generate 2 to 30 times more radioactive waste, per unit of electricity generated, due to loss of economy of scale, according to President Obama's former NRC chair, Allison Macfarlane, and former U.S. Nuclear Waste Technical Review Board chair, Rodney Ewing. PNP's indoor wet storage pool still holds around two-thirds, or more, of the irradiated nuclear fuel on-site, at risk of a catastrophic fire that could be worse than a reactor core meltdown. The "overflow storage" for the remaining one-third of the irradiated nuclear fuel on-site is in dry casks of questionable structural integrity, including an admittedly defective one that was supposed to have been unloaded 31 years ago, but never has been. Holtec's dry casks, with unresolved quality assurance violations, will exacerbate these concerns, including the fact that PNP's dry cask storage pads are in violation of earthquake safety regulations, according to an NRC whistleblower. Holtec proposes high-level radioactive waste barges on Lake Michigan, to the Port of Muskegon, risking a sinking that could contaminate the drinking water supply for 16 million people in 4 states.

(5.) **Endangered Species Act and Coastal Zone Management Act concerns:** We object to NRC and DOE's NLAA (may affect, not likely to adversely affect) and NE (No effect) FONSI conclusions for a large number of endangered species, threatened species, and species of concern

-- both plant and animal, both terrestrial and aquatic -- for which the PNP site and its vicinity is habitat or potential habitat. The Critical (Sand) Dune Area, on the Great Lakes shore, is a unique and fragile habitat and ecosystem, with remarkable biological diversity. The State of Michigan has failed since 1967 to protect this very special place from the severe impacts, hazards and risks from the Palisades atomic reactor. PNP should be retired, as long planned, and decommissioned, including comprehensive clean up of the radioactive contamination, and then the site allowed to heal, after six decades of abuse.

(6.) **Holtec's criminality, corruption, dishonesty, greed, incompetence, inexperience, and untrustworthiness** should disqualify it from NRC, DOE, USDA, and State of Michigan approvals for reactor restart, SMR new builds, and the more than \$16 billion in taxpayer and ratepayer bailouts it has requested for both reactor restart, and SMR new builds. Holtec took over PNP in the first place through a bait and switch trick, con job, and big lie: that it would decommission it, not restart it and build two additional atomic reactors on the tiny 432-acre site.

(7.) **NRC's Purpose and Need Statement is unacceptably shallow and woefully inadequate.** NRC has stated that a recently enacted State of Michigan "clean energy" law mandates the Palisades restart. But nuclear power is not clean — far from it -- despite misguided and wrongheaded claims in the state law. Greenhouse gas emissions, radioactivity releases, and toxic chemical impacts take place at every stage of the uranium fuel chain. Besides, various other supposed reasons have been given, as by Holtec and Michigan Governor Gretchen Whitmer, for Palisades' restart, from supposedly restoring good paying jobs, to electricity needed for Artificial Intelligence (A.I.) data centers, energy storage battery facilities, charging the electric vehicle fleet, climate mitigation, reliability of electricity supply and the electrical grid, etc. We challenge and rebut all these moving target, throwing-spaghetti-against-the-wall-to-see-what-sticks, supposed justifications for Palisades' restart, just below, although NRC and DOE did not even bring them up in the EA. Rather, the agencies only briefly mentioned Michigan's recently passed "clean energy" law, and also very briefly mentioned Holtec's purported claims of electric reliability enhancement, and supposed independence from energy imports from other states/provinces.

Rebuttals of these supposed purposes and needs:

Re: AI data centers, recent news about China's DeepSeek AI system sent shock waves around the world, in terms of how efficiently it could be operated. That is, massive expansions of electricity supply would not be needed.

Besides, where is the NEPA-compliant treatment of these nascent AI data center proposals? Treating AI data centers as a done deal, somehow justifying massive increases in electricity supply, including from restarting closed for good, dangerously age-degraded atomic reactors like PNP, is putting the cart before the horse. This lemming-like societal rush, perhaps over a cliff edge, is unwise in the extreme, and illegal under NEPA's "hard look" requirement. We should resist the rush job, and question such proposals carefully.

Energy storage battery facilities could be supplied by renewables like wind and solar. They do not need to be supplied by electricity from PNP. Besides, the Power Purchase Agreement

between Holtec and the rural electric co-ops, Wolverine in Michigan, and Hoosier in Indiana and Illinois, is supposedly for all, 100%, of PNP's electricity supply from 2025 to 2051. Are the rural electric co-ops associated with the purported AI data centers? If not, then there would be no PNP-generated electricity left over for use at AI data centers. If these rural electric co-ops are involved with powering ravenous AI data centers, how can \$1.3 billion in USDA grants be justified? Are AI data centers projects that USDA grants are meant to support? This makes no sense.

Re: charging electric vehicle fleets, renewables, backed up by energy storage battery facilities, could do this, instead of PNP.

Re: climate mitigation, the expert witness testimony provided by Dr. Mark Jacobson of Stanford University, in support of the environmental coalition opposing Palisades' restart before the NRC's Atomic Safety and Licensing Board, shows that renewables such as wind and solar are much more cost-effective and time-effective at reducing greenhouse gas emissions, than is restarting the PNP, and than are Small Modular Reactor new builds at Palisades and/or Big Rock Point, PNP's sibling atomic reactor site, 250 miles north, also on the Lake Michigan shore.

Re: reliability of electricity supply and the electrical grid, "the lights have stayed on" in Michigan since Entergy closed Palisades for good on May 20, 2022. This is because there is excess electricity on the grid, put in place to accommodate PNP's retirement, as long planned, as well as to accommodate other anticipated or unanticipated peaks in demand, or anticipated or unanticipated temporary shutdowns of electricity generators, or transmission disruptions, in the service area, as due to weather-related events, such as power outages due to ice storms, wind storms, blizzards, etc. Decentralization in the form of micro-grids is another alternative approach to electricity reliability. It is also ironic that Holtec, NRC and DOE are attempting to somehow claim the electric "reliability" high ground at PNP. PNP's 51 years of operations has a low ranking, compared to other nuclear power plants, in terms of capacity factor performance overall. Holtec has tried to portray the interlude between operations at PNP as a long-term refueling outage, instead of the unprecedented permanent-shutdown-reversal-back-to-operational-status that they actually seek. The now three year long and still counting shutdown further reduces PNP's overall capacity factor performance, even if and when it restarts.

Re: reducing the need for importation of electricity into Michigan, this is an ironic Purpose and Need argument to make, given that Holtec plans to export electricity to Indiana and Illinois, as well as to distant parts of Michigan, such as the northern part of the Lower Peninsula, under the PNP Power Purchase Agreement scheme. Why are Michigan state taxpayers being forced to subsidize -- to the tune of \$300 million -- the purchase of extremely overpriced PNP electricity (57% or more above market rates, according to Holtec itself in its 7/5/22 bailout application to DOE), by rural electric co-ops in Indiana and Illinois? Why are American taxpayers from 47 other states being forced to pay nearly \$3 billion already, and perhaps additional billions of dollars more to come, for this extremely overpriced electricity to be consumed in MI, IN, and IL? If nuclear power is such a good idea, why can't it pay its own way in the competitive free market? It never has done so. It has had to be massively subsidized, for many decades, by the public. The nuclear power industry's campaign contributions to candidates for public office, its public relations/propaganda machine, and its lobbying juggernaut in the legislative and executive

branches of state and federal governments, have effectively convinced our political leaders, from both major parties, to hand over the keys to the treasury to this already filthy rich special corporate interest. The nuclear power and nuclear weapons industries are flip sides of the same coin, which exacerbates this military-industrial complex dynamic. In the first independent investigation in the Japanese Parliament's post-World War II history, it concluded that the root cause of the Fukushima Daiichi nuclear catastrophe was collusion between the nuclear safety regulatory agency, the industry, and government officials. Such collusion exists in spades at Palisades, putting us all in peril, and the Great Lakes at existential risk.

(8.) NRC's Alternatives Analysis is unacceptably narrow in scope and woefully inadequate.

Alternatives for the generation of 800 Megawatts-electric of carbon-free *and nuclear-free* electricity generation should not be arbitrarily confined to the tiny 432-acre Palisades site. The alternatives of wind power (both on- and off-shore), solar power (both household/business-scale and industrial scale), and other renewable electricity generation sources should be given the "hard look" required under NEPA. So too should the potential for energy efficiency upgrades, to prevent unnecessary waste of electricity, and decrease demand. Energy storage technologies should also be analyzed as a complement to any intermittency issues associated with renewables like solar and wind.

We incorporate by reference, as if fully rewritten herein, the expert witness testimony of Dr. Mark Jacobson, posted online here:

{February 1, 2025: Beyond Nuclear, et al.'s legal counsel, Wally Taylor of Cedar Rapids, IA, and Terry Lodge of Toledo, OH, submitted expert witness testimony by Dr. Mark Jacobson, professor at Stanford U. and internationally renowned greenhouse gas emission reduction strategist, to the NRC ASLB: [Jacobson congressional testimony, dated Jan. 17, 2024, Seven Reasons Why New Nuclear Energy is an Opportunity Cost That Damages Efforts to Address Climate Change and Air Pollution](#); and [Jacobson book chapter, Dec. 22, 2019, Evaluation of Nuclear Power as a Proposed Solution to Global Warming, Air Pollution, and Energy Security](#).}

Amory Lovins, also a professor at Stanford University, and a founder of the Rocky Mountain Institute, has long asserted that nuclear power takes too long, and costs too much, making it a non-starter for climate mitigation, from a market perspective. He has been making such assertions for decades. He recently spoke about this (Press Briefing: Why Latest Nuclear Revival Is Already Doomed, October 3, 2024). The recording of the press briefing is posted online here:

<<https://www.youtube.com/watch?v=2u8PYEyqr14>>

We incorporate by reference, as if fully rewritten herein, the entirety of Amory Lovins' testimony above.

Lovins also testified about this subject matter at a Capitol Hill congressional briefing, Toward an Evidence-Based Nuclear Energy Policy; What Congress Needs to Know About Nuclear Decommissioning, Radioactive Waste, and Nuclear Energy as a Climate Strategy, on March 30, 2021. We incorporate by reference as if fully rewritten herein the entirety of Lovins' presentation recording, including his slideshow, posted online here:

<<https://www.eesi.org/briefings/view/033021nuclear>>

Dr. Arjun Makhijani, founder and president of the Institute for Energy and Environmental Research, and a Fellow of the American Physical Society, wrote an entire book on this subject matter, entitled Carbon-Free and Nuclear-Free: A Roadmap for U.S. Energy Policy. We incorporate by reference as if entirely rewritten herein the entirety of this book, and related publications, posted online here:

<<https://ieer.org/projects/carbon-free-nuclear-free/>>

These authors, scholars, and experts cited above provide extensive, comprehensive information about the alternatives that NRC and DOE should address in a higher level EIS/PEIS, namely renewables (solar, wind, etc.), efficiency, and storage, as ready, reliable, much more cost-effective, and time-effective, clean, safe and secure methods to mitigate the greenhouse gas emissions that cause global warming and climate chaos, as compared to the "zombie" reactor restart scheme at PNP, as well as to the SMR new builds scheme at Palisades and Big Rock Point.

None other than former Michigan Governor (and former Energy Secretary) Jennifer Granholm herself advocated in favor of developing off-shore wind power available to the Great Lakes State. A study by the Michigan State University Land Use Institute documented that more than 300,000 MW-e of off-shore wind power potential is available to be tapped on the Great Lakes. Gov. Granholm, in 2010, convened an advisory council re: this subject matter. As conveyed by James Clift -- a member of the off-shore wind power advisory council, as well as executive director of Michigan Environmental Council at the time -- in a presentation he made at a renewable energy summit in Southfield, Michigan in June 2010, Gov. Granholm's off-shore wind power advisory council advised some two-dozen criteria to guide the development of off-shore wind power on the Great Lakes. These included avoiding impacts on fisheries, avoiding aesthetic impacts, avoiding historic shipwrecks, etc. The council recommended three areas of the Great Lakes for off-shore wind, based on the two-dozen criteria: extreme southern Lake Michigan, not that far from PNP actually; extreme northern Lake Michigan, not that far from the Big Rock Point nuclear power plant site, actually; and Saginaw Bay, where it opens out into Lake Huron (fortunately, two reactors at the Midland nuclear power plant in that part of the state were blocked from operating, a tremendous environmental victory in the 1980s). Just tapping a very small percentage of the off-shore wind power potential available to Michigan on the Great Lakes would far surpass the 800 MW-e that a restarted PNP would provide, and would also far surpass the additional nuclear megawattage that two SMR-300s at PNP would provide, and would also far surpass the nuclear megawattage one or more SMR-300s at Big Rock Point would provide. This off-shore wind power would also avoid reactor core meltdowns, radioactive waste fires, radioactivity releases from "routine reactor operations," radioactive leaks, spills, and contamination, radioactive waste generation, thermal wastewater, and toxic chemical releases at all these atomic reactors, and would do so cost- and time-effectively, compared to SMR new builds, and even the PNP restart scheme.

We incorporate by reference, as if fully rewritten herein, the following: Governor Granholm Signs Executive Order Creating Great Lakes Wind Council, February 06, 2009. It is posted online here:

<<https://www.michigan.gov/formergovernors/recent/granholm/press-releases/2009/02/06/granholm-signs-executive-order-creating-great-lakes-wind-council>>

Likewise, we incorporate by reference, as if fully rewritten herein, the following:

Report of the Michigan Great Lakes Wind Council, October 1, 2010.

It is posted online here:

<https://www.baycountymi.gov/uploads/GLOWreportOct2010_with%20appendices.pdf>

Why didn't NRC and DOE include a comprehensive analysis of off-shore wind power as an alternative to PNP restart in the EA? Why wasn't solar power (both household/business-scale, as well as utility-scale) comprehensively analyzed as an alternative? Why wasn't on-land wind power comprehensively analyzed? Why weren't energy efficiency and energy storage (such as batteries) comprehensively analyzed as an alternative, especially considering that battery storage has been touted as a supposed Purpose and Need for PNP restart?

(9.) **We support the No-Action Alternative:** No PNP restart should be allowed. Neither should SMRs be built at PNP or Big Rock Point. Rather, PNP's closure for good, and retirement, as well as decommissioning, as long planned and promised to Michiganders, and residents of neighboring states around Lake Michigan. NRC, which is mandated to protect public health and safety, as well as the environment, should not authorize the restart of the problem-plagued from the start, now severely age-degraded Palisades reactor, with multiple safety-significant systems, structures, and components at risk of breakdown, risking reactor core meltdown.

DOE should not risk vast sums of federal taxpayer money — \$1.52 billion, and still counting — on Holtec's scheme. Likewise, the U.S. Department of Agriculture (USDA) should not risk \$1.3 billion on this scheme, namely grants to reimburse the Power Purchase Agreement (PPA) purchasers (the rural electric co-ops Wolverine, in Michigan, and Hoosier in Indiana and Illinois) for 25% of the costs of the exorbitantly overpriced electricity from Holtec's Palisades reactor, from 2025 to 2051. The electricity will cost 57%, or more, above market rates, according to Holtec itself, in its initial PNP restart strategy document and bailout application submitted in secret to DOE on 7/5/22, just a week after taking ownership of PNP, supposedly for decommissioning purposes only, which was a big lie. Holtec has never operated any reactor, let alone a nuclear lemon from the get-go like Palisades, which is now severely, dangerously age-degraded.

(10.) Two SMR-300s being constructed and operated on the tiny 432-acre PNP site, alongside 80 years altogether of extended operations, from 1971 to 2051, at the "zombie" reactor, represents a major cumulative impact and effect. The way NRC essentially ignores all past public comments provided at past proceedings, like the 2006 license extension SEIS comments for the 60-year

license at PNP (1971-2011), is objectionable. It's like NRC was born yesterday, and expects us to be as willfully ignorant and blind as they are, in regards to such large and cumulative impacts and effects at, near, and from PNP. Tremendous good faith effort was put into our environmental coalition's 2006 SEIS public comments. Yet NRC ignored most to all of them. For that reason, they are still relevant. Just because NRC cites the 2006 SEIS repeatedly throughout this EA, does not mean NRC has adequately addressed those comments or concerns, or addressed them at all. For this reason, we incorporate by reference, as if fully rewritten herein, the entirety of our environmental coalition's comments on the draft SEIS from 2006. Those comments are posted online here, at the following two links:

May 18, 2006: [Group comments, submitted by a coalition of organizations including NIRS and numerous grassroots groups in Michigan and other U.S. states and Canadian provinces around the Great Lakes Basin, regarding NRC's draft Environmental Impact Statement on the Palisades 20 year license extension. This coalition represents well over 200,000 residents of Michigan alone, in opposition to the dangerous extension of operations and waste generation at Palisades from 2011 to 2031.](#)

May 18, 2006: [Executive summary of coalition comments to NRC regarding its draft Environmental Impact Statement for the Palisades 20 year license extension.](#)

Additionally, even though NRC and DOE mention Holtec's proposed SMR new build scheme at the PNP site, the substance of the agencies' EA analysis of the cumulative impacts and effects from this additional scheme is woefully inadequate, to the point of illegal segmentation under NEPA law and court ruling precedents. This is another reason an EIS/PEIS is required.

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