

Public Comments to FEMA, re: Holtec Palisades Zombie Atomic Reactor Restart, Covert Township, Van Buren County, Michigan

Prepared and submitted by Kevin Kamps, radioactive waste specialist, Beyond Nuclear (and board of directors member, Don't Waste Michigan, Kalamazoo Chapter)

Submitted on behalf of our members and supporters in the 10-mile Emergency Planning Zone (EPZ), 50-mile EPZ, and beyond

Submitted August 15, 2025, via: <FEMA-PublicComment-Palisades@fema.dhs.gov>

On August 5, 2025 — the eve of the 80th annual commemoration of the U.S. atomic bombing of Hiroshima, Japan on August 6, 1945 — FEMA (the Federal Emergency Management Agency) hosted a public meeting about Emergency Preparedness and Evacuation Planning (EP and EP, or simply EP), also referred to as Radiological Emergency Preparedness (REP), at the Van Buren Intermediate School District Conference Center in Lawrence, Michigan. The meeting was focused on Holtec's plan to soon restart the Palisades atomic reactor in Covert Township, just south of South Haven, on the Lake Michigan shore in Van Buren County, Michigan, an unprecedented act in this country, and even worldwide, to restart a permanently closed reactor.

(See [FEMA's July 21, 2025 press release, announcing the August 5, 2025 public meeting](https://www.fema.gov/press-release/20250722/public-briefing-preparations-holtec-palisades-nuclear-power-plant-restart), here: <<https://www.fema.gov/press-release/20250722/public-briefing-preparations-holtec-palisades-nuclear-power-plant-restart>>.)

Multiple federal (FEMA, NRC) and state/county (MI EGLE, county emergency preparedness and evacuation planners, Sheriff's Departments) officials spoke during the formal presentations segment of the meeting.

Beyond Nuclear's radioactive waste specialist, Kevin Kamps (a Kalamazoo, Michigan resident, 35 miles downwind, well within the 50-mile Palisades Emergency Planning Zone, or EPZ), took part as a member of the public, on behalf of Beyond Nuclear's members and supporters in the 10- and 50-mile EPZs, and beyond. So too did several additional local residents, as from the 120-year old Palisades Park County Club resort community of 200 cottages (PPCC, the Palisades atomic reactor's immediate neighbors to the south — PPCC and the nuclear power plant not only share a name, but also a fenceline), and the City of South Haven, just a few miles north from the atomic reactor. Kamps and several local residents made verbal public comments during the course of the meeting.

A FEMA staffer took notes, but no audio-video recording was made, apart from those taken by two area television station cameras, although that footage was likely not shared with FEMA, nor was it shared with the public, apart from short clips aired during the respective resultant local news reports. The FEMA staffer's notes have also not been sent to or shared with the public participants, as of August 15, 2025, when these comments were submitted to FEMA.

However, FEMA has made available a copy of the 69-page slideshow that was presented during the meeting. Beyond Nuclear has posted it online here: <<https://beyondnuclear.org/wp-content/uploads/2025/08/8-5-25-FEMA-PowerPoint-Template-PUBLIC-MEETING-Full-deck-final.pdf>>. The slideshow is entitled “FEMA Public Meeting: Holtec Palisades Restart.”

During the meeting, a FEMA official provided an email address, and encouraged additional, written comments be submitted via the email address by August 15, 2025. Hence, we are submitting these public comments to FEMA-PublicComment-Palisades@fema.dhs.gov by the stated deadline.

However, we do so under protest, as a mere ten-day public comment period is woefully inadequate. It is not just inadequate in terms of the amount of time needed to prepare meaningful, comprehensive comments on these grave matters. It is also an inadequate amount of time to even spread the word to concerned citizens and residents in harm’s way downwind and downstream of Palisades, as well as up the food chain, in order to activate them by FEMA’s arbitrarily short deadline for public comments. It is the height of tourist and summer vacation season in southwest Michigan on the Great Lakes shoreline, after all.

Also, confusion was created by what appears to be an incorrect public comment deadline date given in the slideshow. Although slide #68 was in agreement with the FEMA official’s verbally provided deadline date, given at the public meeting, of August 15, 2025, slide #12 actually states August 8, 2025 as the deadline. The latter appears to be an error, given that August 8 was just three days (two business days) after the August 5 evening meeting.

But such an error reflects the highly rushed nature of these FEMA proceedings. Haste makes waste, and hurrying results in mistakes, which, in a nuclear power plant radiological emergency, could cost lives. The stakes could not be higher. Emergency Preparedness and Evacuation Planning (EP)/Radiological Emergency Preparedness (REP) should not be rushed, and yet it has been at Palisades, very much so, never worse so than this present moment, in the context of EP/EP/REP, and the FEMA public comment proceeding and deadline. This apparently has been done to accommodate Holtec’s rushed restart schedule, which in turn appears to be driven by Holtec’s recently announced Initial Public Offering (IPO), reportedly to be held in January 2026.

PUBLIC COMMENTS FROM ATTENDING THE IN-PERSON MEETING:

What follows are public comments based on Kevin Kamps’s thoughts and observations while attending the FEMA public meeting on August 5, 2025. They are provided on behalf of Beyond Nuclear’s members and supporters in the 10- and 50-mile EPZs, and beyond.

Kamps attended a Kalamazoo County Democratic Party monthly meeting a few months ago. The featured speaker was the Kalamazoo County Sheriff. During the Question and Answer/Q&A period, Kamps asked the Sheriff if his office had been contacted by the state or FEMA about

Holtec's plans to restart Palisades, especially concerning Emergency Preparedness and Evacuation Planning. The Sheriff answered "no."

Given the participation by three counties' Sheriff's Departments — Van Buren, Allegan, and Berrien — why was the Kalamazoo County Sheriff's Department not contacted, nor involved or allowed to participate in these official EP/REP activities?

This is not a good sign. Kalamazoo County is immediately downwind of Palisades, to the east, in the direction of prevailing winds blowing from the Lake Michigan shoreline, inland, directly towards Kalamazoo. As Lake Michigan is west of Palisades, blocking evacuation in that direction except for those who have access to fast boats, a large percentage of Van Buren county residents evacuating during a radiological emergency at Palisades could well drive directly east, into Kalamazoo County. A certain percentage of Allegan and Berrien County residents could also evacuate to Kalamazoo County or the City of Kalamazoo as well. Certainly, located just inland, Kalamazoo County would strongly feel the effects and impacts of a mass evacuation of residents and visitors from the southwest Michigan shoreline. The Kalamazoo County Sheriff's Department would help lead the response to this max influx of potentially thousands, or even tens of thousands, of people, their pets, etc. And yet the Kalamazoo County Sheriff's Office had not even been contacted yet, as recently as just several weeks ago? This does not bode well.

Of course, much of Kalamazoo County is also well within the 50-mile Emergency Planning Zone for Palisades. Depending on weather conditions during the course of releases of hazardous radioactivity from Palisades, Kalamazoo County could be directly impacted itself, necessitating Evacuation Planning and Emergency Preparedness/Radiological Emergency Preparedness there, too. Such radioactive fallout could impact far beyond 50 miles, actually. And yet little EP/EP/REP seems to have taken place beyond the tri-county area of Allegan, Berrien, and Van Buren, and perhaps no EP/EP/REP beyond a certain distance, even still located within the 50-mile EPZ.

Fallout from Chernobyl in 1986 blew with the wind, and fell with the rain, literally thousands of miles away, in places as far flung as Scotland, Lappland, and Siberia, in various directions. This was due to the Chernobyl fallout cloud blowing around Europe in figure-8 patterns, with the prevailing winds and weather patterns, over the course of days and weeks after Chernobyl Unit 4 first exploded, and its debris burned for ten days, reaching the land's surface, and surface waters, as fallout, or contaminated precipitation. In fact, southwest Michigan experienced a certain level of fallout from Chernobyl as well, beginning within days or weeks of the explosion and ten-day long fire. On our small planet, a nuclear catastrophe anywhere, is a nuclear catastrophe everywhere.

Similarly, Southwest Michigan also experienced elevated radioactive fallout in the days and weeks after the Fukushima Daiichi, Japan triple reactor meltdowns had begun in March 2011.

The effective and even official, explicit termination of Emergency Preparedness and Evacuation Planning/Radiological Emergency Preparedness requirements after the Palisades atomic reactor's

supposedly permanent shutdown on May 20, 2022 made no sense in the first place. Given the nearly 1,000 metric tons of highly radioactive irradiated nuclear fuel stored on-site at Palisades, which had been generated from 1971 to 2022, a radiological catastrophe was still all too possible there, even during the supposed decommissioning status stage, after the supposedly permanently shutdown of the atomic reactor, and supposedly final removal of fuel from the core.

At the time of Palisades' permanent shutdown, around two-thirds of all irradiated nuclear fuel ever generated there in the past 51 years of operations was still stored in the indoor wet storage pool. As reported by Alvarez, *et al.* in January 2003 <https://beyondnuclear.org/wp-content/uploads/2025/08/11_1Alvarez.pdf>, Alvarez in May 2011 <https://beyondnuclear.org/wp-content/uploads/2025/08/spent_nuclear_fuel_pools_in_the_US1.pdf>, von Hippel, *et al.* in 2016 <<https://archive.beyondnuclear.org/on-site-storage/2016/5/26/spent-fuel-fire-on-us-soil-could-dwarf-impact-of-fukushima.html>; and https://scienceandglobalsecurity.org/archive/2016/09/reducing_the_danger_from_fires.html>, etc., irradiated nuclear fuel pool fires could unleash mega-catastrophes (or giga-catastrophes, for that matter!), in terms of the amounts of volatile, hazardous radioactive substances, such as Cesium-137 (Cs-137), that would be released into the environment, to then cause harm or even death, downwind, downstream, up the food chain (radioactivity bio-concentrates, -accumulates, and -magnifies, as the late, great Dr. Rosalie Bertell of the International Institute of Concern for Public Health, and the International Joint Commission Nuclear Task Force, long warned), and down the generations (Cs-137 has a 30-year half-life, so at least 300 years, or even 600 years, of hazardous persistence; Strontium-90 is similarly long-lived, and persistently hazardous and deadly; Plutonium-239, however, has a more than 24,000-year half-life, so more than 240,000 to even 480,000 years of hazardous persistence; Iodine-129 has a 15.7 million-year half-life, so 157 to 314 million years of hazardous persistence; etc.).

After reviewing the matter, the U.S. National Academies of Science (NAS) agreed with Alvarez, *et al.* (Jan. 2003) that highly radioactive irradiated nuclear fuel indoor wet storage pools at commercial nuclear power plants are vulnerable to terrorist attack and sabotage. But the U.S. Nuclear Regulatory Commission (NRC) opposed release of even a redacted version of the NAS report for the public to read. NRC's block persisted for many months, even years. But at long last, a public version of the report was released, despite NRC's interference:

The National Academy of Sciences Report on "Safety and Security of Commercial Spent Nuclear Fuel," April 06, 2005:

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<<http://archives.nirs.us/reactorwatch/security/securityhome.htm>>

A pool fire at Fukushima Daiichi Unit 4 was very narrowly averted in March-April 2011 through sheer luck, according to a 2012 report by a panel of the National Academies of Science, on which Dr. Frank von Hippel of Princeton University served. <<https://www.nationalacademies.org/our-work/lessons-learned-from-the-fukushima-nuclear-accident-for-improving-safety-and-security-of-us-nuclear-plants>; and <https://www.nationalacademies.org/news/2016/05/fukushima-daiichi-nuclear-accident-is-wake-up-call-for-us-to-improve-real-time-monitoring-of-spent-fuel-pools>>

Also in 2012, Naoto Kan, who had served as Japan's prime minister during the first months of the Fukushima Daiichi nuclear catastrophe, publicly admitted he had had a secret contingency plan in the works to evacuate 35 to 50 *million* people from northeastern Japan, including metro Tokyo, had the Fukushima Daiichi Unit 4 pool caught fire. "To where?!" is a good question, as Japan has a very small land mass, especially considering its very large population density. Kan stated it would have been "the end of the Japanese state."

A big part of the giga-catastrophic risks and potential consequences of a pool fire is the fact that pools have no robust radiological containment structures over them. Volatile radioactive releases, as of Cs-137, would be directly into the environment.

As reported in Alvarez, *et al.* (2003):

A 1997 study done for the NRC estimated the median consequences of a spent-fuel fire at a pressurized water reactor (PWR) that released 8–80 MCi of ^{137}Cs [Cesium-137]. The consequences included: 54,000–143,000 extra cancer deaths, 2000–7000 km² of agricultural land condemned, and economic costs due to evacuation of \$117–566 billion.

<citing: *A Safety and Regulatory Assessment of Generic BWR and PWR Permanently Shutdown Nuclear Power Plants*, by R. J. Travis, R. E. Davis, E. J. Grove, and M.A. Azarm, Brookhaven National Laboratory, NUREG/CR-6451; BNL-NUREG- 52498, 1997.>

As the seven co-authors of Alvarez et al. (Jan. 2003) stated, "It is obvious that all practical measures must be taken to prevent the occurrence of such an event." (Page 10)

Such a fast-breaking giga-catastrophe would render EP/EP/REP significantly ineffective over a vast region, and its hazardous and even deadly consequences would persist for a vast time period into the future.

Given that the amount of irradiated nuclear fuel that was densely packed into the Palisades indoor wet storage pool on July 11, 2022 (the day Holtec requested NRC officially exempt it

from EP/EP/REP at Palisades — see FEMA slideshow slide #4 of 69) was much larger than the amount of fuel in the Fukushima Daiichi Unit 4 pool in March-April 2011, a pool fire at Palisades could potentially have been even worse than a pool fire at Fukushima. As mentioned further below, Palisades has come precariously close to a giga-catastrophic pool fire in the past.

Holtec should not have applied for an exemption from or waiver on Emergency Preparedness and Evacuation Planning/Radiological Emergency Preparedness requirements, nor should NRC have approved it.

But the one-third of Palisades' irradiated nuclear fuel stored outdoors, in dry casks, is also not immune from disastrous releases of hazardous ionizing radioactivity.

As shown by Dr. Gordon Thompson, January 2003, a remotely-fired anti-tank missile could breach a Palisades dry cask, releasing its hazardous and deadly contents into the environment. See:

[Executive Summary of “Robust Storage of Spent Nuclear Fuel: A Neglected Issue of Homeland Security”](http://archives.nirs.us/reactorwatch/security/sechosses012003.pdf), Institute for Resource and Security Studies (January 2003) focuses on the vulnerability of irradiated fuel stored at the nation's nuclear power stations to terrorism and what we can do about it. <<http://archives.nirs.us/reactorwatch/security/sechosses012003.pdf>>

[Full report of “Robust Storage of Spent Nuclear Fuel: A Neglected Issue of Homeland Security”](http://archives.nirs.us/reactorwatch/security/sechossrpt012003.pdf), Institute for Resource and Security Studies (January 2003) focuses on the vulnerability of irradiated fuel stored at the nation's nuclear power stations to terrorism and what we can do about it. <<http://archives.nirs.us/reactorwatch/security/sechossrpt012003.pdf>>

If attackers came armed with multiple anti-tank missiles, they could breach an equal number of dry casks. If the explosive attack were combined with hot-burning, high temperature incendiaries, the irradiated nuclear fuel in the dry casks could be set on fire, such as by reaching the ignition temperature of the zirconium metal cladding on the fuel rods. This would worsen the catastrophic releases of highly radioactive gases and particles escaping the dry cask(s) from the disintegrated and/or burning irradiated nuclear fuel.

So Palisades' Emergency Preparedness and Evacuation Planning/Radiological Emergency Preparedness should never have been terminated in the first place. But it was. Which makes what happened from December 2024 to April 2025 at Palisades even more outrageous.

We learned, after the fact, of a highly radioactive irradiated nuclear fuel transfer, from pool to dry cask, from a *St. Joe-Benton Harbor Herald-Palladium* article, reporting on a Holtec press release (*Holtec Highlights*, April 7, 2025, “Palisades Restart Forges Ahead with Several Key Milestones Achieved,” see final paragraph <<https://holtecinternational.com/2025/04/07/hh-40-08/>>).

Such transfers are potentially high-risk, as they involve the movement of very heavy loads, lifted by cranes, over the indoor wet storage pool. The drop of such a very heavy load, from the crane into the pool, could breach the pool, and drain away its cooling water. The densely-packed irradiated nuclear fuel in the pool, without circulating cooling water, could heat up to the ignition temperature of zirconium within just a few hours. And once the cooling water supply was reduced or eliminated, the radiation shielding it had provided would also be reduced or eliminated. This would put plant personnel and emergency responders closely approaching the pool at risk of being exposed to fatal radiation doses in very short periods of time.

The outrage is that the irradiated nuclear fuel transfer operation at Palisades was conducted in the absence of Emergency Preparedness and Evacuation Planning/Radiological Emergency Preparedness approved by NRC and FEMA, let alone ones well practiced/trained/exercised recently — not for many years, at that point — by the state, counties, or local host municipalities.

Fortunately, a very heavy load was not dropped during the movements over the pool at Palisades, from December 2024 to April 2025. But public health, safety, security, and environmental protection should not depend on “sheer luck,” as was mentioned above about pool fire risks at Fukushima Daiichi in Japan in March-April 2011.

But this is not an academic exercise, nor fear mongering.

As documented below, Palisades (albeit under previous owner/operator Consumers Energy, not current owner Holtec) had a very near miss with dropping a 107-ton load (a fully loaded irradiated nuclear fuel transfer cask), due to operator errors, in October 2005:

April 4, 2006: [Summary Report on High-Level Atomic Waste Mishap at Palisades Nuclear Reactor Risks Radioactive Inferno with Casualty Potential of Thousands of Deaths Downwind, Based Upon U.S. Nuclear Regulatory Commission Freedom of Information Act \(FOIA\) Response Documents](http://archives.nirs.us/reactorwatch/licensing/caskdanglesummaryreport4406.pdf), prepared by NIRS for release at press conference at the State Capitol in Lansing, Michigan. <<http://archives.nirs.us/reactorwatch/licensing/caskdanglesummaryreport4406.pdf>>;

March 20, 2006: [High-Level Atomic Waste Mishap at Palisades Nuclear Reactor Risks Radioactive Inferno with Casualty Potential of Thousands of Deaths Downwind](http://archives.nirs.us/press/03-20-2006/1). NIRS and coalition press release <<http://archives.nirs.us/press/03-20-2006/1>>;

March 18, 2006: “[NUCLEAR SAFETY LEFT HANGING AS CRANE DANGLED FUEL RODS MICHIGAN INCIDENT GOT WARNING BUT NO FINE](https://beyondnuclear.org/wp-content/uploads/2025/04/Cask-Dangle-Article-Detroit-Free-Press-march-18-2006-5.pdf),” HUGH McDIARMID, JR., FREE PRESS STAFF WRITER, *Detroit Free Press*, Page 1A <<https://beyondnuclear.org/wp-content/uploads/2025/04/Cask-Dangle-Article-Detroit-Free-Press-march-18-2006-5.pdf>>.

At least NRC- and FEMA-certified Emergency Preparedness and Evacuation Planning/Radiological Emergency Preparedness was in place at Palisades in October 2005, in the event it had been needed by the State of Michigan, as well as host counties and municipalities, and neighboring regions beyond, had it been needed. But again, as above, the fast-breaking giga-catastrophe of a highly radioactive waste storage pool fire could be government-ending, as former Japanese prime minister Naoto Kan put it in 2012. He was reflecting on the first days and weeks of the Fukushima Daiichi nuclear catastrophe, as when extraordinary, very high-risk measures were being taken, such as the desperate St. Patrick's Day (March 17, 2011, U.S. time) Japan Self-Defense Forces helicopter drops of seawater, onto the Unit 4 pool, in a vain attempt (the wind blew the water drops off target) to make sure the irradiated fuel in the pool remained covered with a cooling water supply.

No such certified-preparedness and -planning (EP/EP/REP) was in place from December 2024 to April 2025, while Holtec transferred irradiated nuclear fuel from the indoor wet storage pool, to outdoor dry casks, involving the movement of very heavy loads above the pool.

This is because Holtec had asked, on July 11, 2022, that NRC exempt it from, or waive, any further emergency and evacuation (EP/EP/REP) requirements, as Palisades was permanently shutdown at the time. NRC approved the exemption/waiver request, ending such requirements. Never mind that the radiological risks at Palisades were still present on July 11, 2022 — specifically, in the indoor wet storage pool, as well as the outdoor dry casks. EP/EP/REP never should have been ended at Palisades, from July 11, 2022 on. NRC and FEMA should not have allowed this. And NRC should never have allowed irradiated nuclear fuel transfers, from pool to dry cask, at Palisades, from December 2024 to April 2025, with no officially-approved and -certified, let alone locally/regionally practiced/exercised/trained EP/EP/REP in place.

But Holtec had applied to the U.S. Department of Energy (DOE) on July 5, 2022, requesting many billions of dollars in public bailouts, and laying out its restart plan, as well as its “Small Modular Reactor” new build capabilities, including at Palisades. <<https://beyondnuclear.org/5775-2/>>

Holtec already planned to restart Palisades (by July 5, 2022, at the latest) by the time it requested relief from any further emergency-preparedness and evacuation-planning requirements (on July 11, 2022), but used Palisades' NRC-certified decommissioning status as a cover to hide behind, evading such responsibilities, apparently merely in a bid to save money, and boost profits.

Thankfully no heavy load was dropped onto or into the Palisades pool during irradiated nuclear fuel transfers conducted from December 2024 to April 2025. But it could have happened. And chances are high that emergency notification and evacuation would have happened very chaotically in response, as many to most implicated jurisdictions, including host county Van Buren, had stood down such planning and preparedness, 17 to 21 months earlier. In fact, EP/EP/REP exercises and training had not been held locally or regionally for many long years, at that point. Previous owner/operator Entergy had succeeded, beginning in December 2016, to persuade NRC to allow it to forego not only EP/EP/REP exercises and trainings, but even inspections, repairs, replacement, and other vital maintenance at Palisades, because, after all, it was about to shut down for good. Now that that lie is finished and one, we are haunted by

Entergy, and now Holtec's, running of Palisades into the ground, and long neglect of EP/EP/REP. Rushed planning, training, and exercises cannot adequately make up for many long years of neglect. Holtec's January 2026 IPO should not be driving Palisades' breakneck restart schedule, neither at NRC nor at FEMA.

Such risk-taking is outrageous. How were the fuel transfers even legal, without NRC- and FEMA-certified and -approved EP/EP/REP plans and preparations officially in place, on the books? Here it is, several months after the fuel transfers, and such plans and preparations are still not officially in place, or on the books. They never should have been ended in the first place, given the presence of nearly a thousand metric tons of irradiated nuclear fuel, stored on-site at Palisades, in the indoor wet storage pool, as well as outdoor dry casks.

A FEMA letter dated February 12, 2024, sent to Governor Gretchen Whitmer of Michigan, <<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML24095A289>> documents that NRC no longer required emergency planning and evacuation preparedness at Palisades, after January 4, 2024. This was per Holtec's request to NRC on July 11, 2022, to end such requirements. This letter was docketed on the NRC ADAMS (Agencywide Documents Access and Management System) on June 10, 2025 — 16 long months after it was published. Given this letter's critical importance, why was there such a long delay in its publication on ADAMS?

Again, NRC never should have approved this. Especially considering that Holtec had publicly announced, on September 9, 2022, that it planned to restart Palisades, not decommission it. Why did NRC end emergency preparedness and evacuation planning/radiological emergency preparedness requirements at Palisades, 15 months after Holtec had publicly stated its intent to restart Palisades?

This ending of such requirements, only to then re-implement such requirements, is wasteful, fraudulent, and abusive. How much public money has it cost, to first end EP/EP/REP at Palisades, only to now re-establish it?! It also put the public at undue risk, such as during Holtec's heavy load operations over the pool, from December 2024 to April 2025, during irradiated nuclear fuel transfer into dry cask storage, even though emergency preparedness and evacuation planning/REP requirements, and associated exercises and trainings, had been officially terminated on January 4, 2024, per the FEMA letter cited above. In fact, REP exercises and trainings at Palisades had been waived for many long years at that point, even during Entergy's tenure, supposedly justified by Palisades' impending permanent closure, which turned out to not be the case at all. The public is sick and tired of this chaotic roller coaster ride, perpetrated by the very government agencies, such as NRC and FEMA, that are supposed to protect public health and safety, security, and the environment, against the forever deadly hazards of ionizing radioactivity.

To make matters worse, Holtec had already secretly applied to DOE on July 5, 2022 — just a week after taking over at Palisades on June 28, 2022 — for many billions of dollars in bailouts, and laying out its strategy for restarting Palisades. Beyond Nuclear documented this via a Freedom of Information Act request to the State of Michigan.

<<https://beyondnuclear.org/5775-2/>>

Why did Holtec ask NRC, on July 11, 2022, to waive requirements for emergency preparedness and evacuation planning/REP, by exempting the company from regulations, when the company had already decided, by July 5, 2022, if not even earlier, that it was going to restart Palisades, rather than decommission it? “Something is rotten in the state of Denmark.”

By the way, even a 50-mile EPZ is woefully inadequate.

After all, in the first days of the Fukushima Daiichi nuclear catastrophe in Japan, in mid-March 2011, the chairman of the U.S. Nuclear Regulatory Commission (NRC), Dr. Greg Jaczko, literally backed by President Obama and Secretary of State Hillary Clinton at a press conference in Washington, D.C., recommended that American citizens in Japan get at least **50-miles** (around 80-kilometers) away from the radioactive catastrophe unfolding at the earthquake- and tsunami-crippled nuclear power plant. This was quite significant, in that the government of Japan had recommended that its own citizens only needed to evacuate to a distance of 12.5-miles (around 20-kilometers away).

Clearly, at least 50-mile EPZ is called for at Palisades. FEMA, NRC, the State of Michigan, etc., should meaningfully re-establish it, including EP/EP/REP exercises and trainings comprehending all jurisdictions out to that distance (including the county and city of Kalamazoo, as stated at the very beginning of these comments), given Holtec’s rush job to restart the 60-year old atomic reactor. It was designed in the mid-1960s. Ground was broken on construction in 1967. It fired up in 1971, and then had 51-years of problem-plagued operations. It was a lemon from the get-go, with owner Consumers Power suing builder Bechtel for \$300 million for construction errors. In today’s dollar figures, that would be nearly \$2.4 billion. Consumers eventually settled for \$13 million (more than \$100 million in today’s dollar value figures). Consumers Power then simply fired up Palisades, without correcting the construction errors. For all these, and many other reasons, including Palisades’ severe age-related degradation, or breakdown phase, status, a well trained, exercised, planned and prepared 50-mile EPZ is demanded, in addition to the 10-mile EPZ.

During the course of the August 5, 2025 public meeting, a member of the public asked a question about the Three Mile Island Unit 2 meltdown on March 28, 1979, that prompted NRC’s Office of Public Affairs spokesman, Scott Burnell, to speak up. Burnell invoked the Price-Anderson Act.

When Beyond Nuclear’s Kevin Kamps had a chance to speak at the microphone later in the meeting, he conveyed that, remarkably and inexplicably, the NRC itself had never invoked an Extraordinary Nuclear Occurrence (ENO) at Three Mile Island after the meltdown at Unit 2. For this reason, Congress never took up the matter, let alone acted to implement the provisions of the Price-Anderson Act — that is, never decided to compensate victims and survivors of the nuclear disaster. If monetary settlements were paid by TMI-2’s owner/operator, and/or its private insurance company or companies, they were out-of-court settlements. These out-of-court settlements involved Non-Disclosure Agreements (NDAs). That is, if a compensated victim or survivor spoke publicly about their experiences during or after the meltdown, they would violate the NDA, and be vulnerable to losing the agreed upon compensation. The NDAs have served to bury the truth about the experiences of the victims and survivors of the TMI-2 meltdown.

To begin to unbury that truth, Beyond Nuclear published a newsletter focused on the TMI-2 meltdown, at its 35th annual commemoration, in spring 2014. See it posted online here: <https://static1.1.sqspcdn.com/static/f/356082/24557781/1395166421747/Thunderbird_TMI_March2014.pdf?token=Ghmt%2BxzWh8zvxK8BTdlEyRvdfDY%3D>.

The documentary film *RADIOACTIVE: THE WOMEN OF THREE MILE ISLAND*, has also delved into this buried truth. By filmmaker Heidi Hutner, the documentary allows victims and survivors of the TMI-2 meltdown to tell their own stories. Learn more about the film, here: <<https://radioactivethefilm.com/>>.

Certainly, the disastrous breakdowns and chaos in emergency preparedness and evacuation planning in the aftermath of the TMI-2 meltdown are cautionary tales. Lessons that should have been learned should be applied at Palisades. Of course, the main lesson that should have been learned is that nuclear power is not safe, and should be abolished. But far from learning that lesson, now Constellation Energy plans to follow Holtec's precedent at Palisades, and restart the Three Mile Island Unit 1 reactor, which closed for good in 2019. Lessons that should have been learned, were not, or else have been forgotten since, including at Palisades and Three Mile Island, as well as Duane Arnold, Iowa, in terms of unprecedented restarts of closed reactors, which are unneeded, insanely expensive for the public, and extremely high risk for health, safety, security, and the environment.

Additional attempts to get out the truth at TMI in the aftermath of the meltdown include Karl Grossman's Enviro-Video interviews with survivors and victims. Grossman is an investigative journalist, and founding Beyond Nuclear board of directors member.

They also include interviews by Harvey Wasserman with survivors and victims, which were published. Wasserman, a visionary historian, is a more than half-century long anti-nuclear watchdog, and renewable energy advocate.

So too interviews by Aileen Mioko Smith, with survivors and victims. The Beyond Nuclear newsletter above republished excerpts of these interviews. Mioko Smith now directs Green Action in Kyoto, Japan.

So too the book *The Warning: Accident at Three Mile Island: A Nuclear Omen for the Age of Terror*, by Gray and Rosen. <<https://www.amazon.com/Warning-Accident-Island-Nuclear-Terror/dp/0393324699>>

So too the book *The People of Three Mile Island* by Robert del Tredichi. <<https://www.amazon.com/People-Three-Mile-Island/dp/0871562375>>

And of course so too the work of Three Mile Island Alert (TMIA), from 1977 (two years before the disaster at TMI-2) to the present. We are honored and privileged to have TMIA as a member group in our environmental coalition legally challenging Holtec's restart scheme at Palisades. TMIA also leads the opposition to the TMI-1 restart scheme. See the TMIA website here: <<http://www.tmia.com/>>.

Speaking of “the Age of Terror” and nuclear security risks most relevant to EP/EP/REP, Palisades not only has had a miserable safety record, it has also had a horrible security record.

Perhaps the most infamous security breach at Palisades, thus far anyway, was revealed by *Esquire* magazine in 2007. See:

May 15, 2007: [Esquire magazine reports Palisades nuclear power plant security chief falsified his background, experience and security credentials](http://archives.nirs.us/press/05-15-2007/1). <<http://archives.nirs.us/press/05-15-2007/1>>

and

“Mercenary: If you learned that the man in this photo—a professional assassin—was the head of security at one of our nation's most vulnerable nuclear facilities, would it trouble you? Or would it sound like one hell of a story?”, by Tom Junod, *Esquire*, June 1, 2007. <<https://classic.esquire.com/article/2007/6/1/mercenary-tom-junod>>

Inexplicably, even after the publication of this *Esquire* article, “Zeke the Mercenary” — actually, William Clark’s — “Viper Team” nuclear power plant security plan, developed by the heavily-armed fraudster at Palisades, was still being touted as a national model, for implementation at other nuclear power plants. NRC featured a session at its Regulatory Information Conference about it in 2008, with an FBI agent, and Michigan State Police officers, on the panel, lending it credence. Talk about “Through the Looking Glass”! Nuclear security plans and policies were being based on a thinly-veiled, already-outed fraud?!

But there have been many other security breaches at Palisades over the course of decades, as well.

On the first anniversary of the 9/11 terror attacks, two suspicious cars entered the Palisades nuclear power plant, and proceeded to penetrate deep into the property. Palisades’ security mistakenly contacted the wrong local law enforcement agency for backup, resulting in a 45-minute delay in response. By that time, the cars had long since driven off, their occupants never identified or questioned. They may have been local teenagers, making mischief, out for a joy ride. Luckily they weren’t terrorists, it appears. Again, nuclear power plant security should not rely on sheer luck.

Also, a security guard at Palisades, who had been required to work 72-hour work weeks for many months on end, after the 9/11 attacks, had a nervous breakdown on the job, while heavily harmed. Thankfully, neither they, nor anyone else, was physically hurt in the incident.

On September 12, 2002, one year after the 9/11 attacks, Peter Stockton at the Project on Government Oversight (POGO) published a report, *Nuclear Power Plant Security: Voices from Inside the Fences*. <<https://www.pogo.org/reports/nuclear-power-plant-security-voices-from-inside-fences>>. With a focus on Entergy’s performance at Indian Point nuclear power plant near New York City, Stockton documented this common practice of working nuclear power plant security guards to the breaking point, apparently as a way for reactor owners/operators to avoid

hiring additional guards, and having to train them, and having to provide them with benefits, in addition to their salaries. The companies preferred to just work their existing security guard forces to the breaking point. And NRC allowed them to do so. It was shameful, and undermined nuclear power plant security in the aftermath of the 9/11 attacks, truth be told.

Ironically enough, Entergy took ownership of Palisades in early 2007. Although Consumers Energy had hired Zeke the Mercenary in the first place, Entergy kept him on as head of security after it took over. As a Van Buren County Sheriff's Department official was quoted in a local newspaper, William Clark had "fooled everyone" about his qualifications, credentials, and security clearances. This also included NRC, FBI, and the Michigan State Police (MSP), as well as local law enforcement agencies, and Entergy (and before it, Consumers Energy) itself. Clark's troubling on-the-job behavior, such as bragging about being a one-man death squad, sent overseas to conduct assassinations by shadowy U.S. government agencies, do not seem to have raised any red flags. Neither did Clark's personal arsenal of weaponry he kept at his private home nearby Palisades.

Another horrific crime gives us pause about nuclear power plant security in southwest Michigan. Many years ago, but after the 9/11 attacks, when it was assumed nuclear security had been strengthened, an employee at the Donald C. Cook nuclear power plant in Bridgman, Berrien County, Michigan, owned and operated by American Electric Power/Indiana-Michigan Power, murdered his own family members, and then killed himself. The crime took place at their private home in the area. But what if the person had instead launched an attack at Cook, as in the control room? If such a person, with violent and even murderous intent, can land and keep a job at a southwest Michigan nuclear power plant, how are we to be confident in security precautions?

Of course, acts of terror or sabotage could trigger a full blown emergency at Palisades, prompting the need for full-scale evacuation orders for the surrounding area/region, perhaps out to great distances.

A FEMA official mentioned during the course of the August 5, 2025 public meeting in Lawrence, Michigan, that 4.2 million Americans reside within 10 miles of a nuclear power plant, and that 133 million Americans live within 50 miles of an atomic reactor. How can we — and hundreds of thousands of residents within the 10- and 50-mile EPZs around Palisades — share FEMA's and the Michigan State Police's confidence, as expressed at this August 5th meeting, that Emergency Preparedness and Evacuation Planning/Radiological Emergency Preparedness are safe and sound, given Palisades' past, repeated security breaches alone, as mentioned above, and others mentioned further below?

The same question applies to safety lapses, for which Palisades is long infamous.

Ever worsening extreme weather, due to worsening climate chaos, also comes to mind.

Even earthquakes are a risk to Palisades' dry cask storage of highly radioactive irradiated nuclear fuel, as revealed by an NRC whistleblower:

Feb. 2, 2007: [Declaration by Dr. Ross Landsman, retired NRC dry cask storage inspector, supporting NIRS contentions about earthquake risks to dry cask storage at Palisades <http://archives.nirs.us/reactorwatch/licensing/020207landsmandec.pdf>;](http://archives.nirs.us/reactorwatch/licensing/020207landsmandec.pdf)

and

February 17, 1994: [Letter from Dr. Ross Landsman, NRC Region III dry cask storage inspector, to NRC Chairman Ivan Selin, warning about the risk at Palisades that an earthquake could result in high-level radioactive waste storage casks falling into Lake Michigan or being buried in loose sand. Dr. Landsman writes](http://archives.nirs.us/reactorwatch/licensing/021794rosslandsmanltrnrchairmanselin.pdf) “Actually, [it’s] the consequences that might occur from an earthquake that I’m concerned about. The casks can either fall into Lake Michigan or be buried in the loose sand because of liquefaction...It is apparent to me that NMSS [NRC’s Nuclear Materials, Safety, and Safeguards division] doesn’t realize the catastrophic consequences of their continued reliance on their current ideology.” Underwater submersion could lead to inadvertent nuclear chain reactions in the fissile materials still present in the wastes; burial under sand could cause the wastes to dangerously overheat. [<http://archives.nirs.us/reactorwatch/licensing/021794rosslandsmanltrnrchairmanselin.pdf>](http://archives.nirs.us/reactorwatch/licensing/021794rosslandsmanltrnrchairmanselin.pdf)

Many examples have been given above of triggering events that could cause a radiological emergency at Palisades, and need for mass evacuation in the local area, and perhaps even broader region. As Kamps asked FEMA officials at the in-person meeting, many of whom are based at FEMA’s Chicago regional office, what backup plan do they have to provide drinking water to the third largest city in the country, with more than 2.7 million residents within the city limits alone, in the event that Palisades radioactively poisons Lake Michigan, Chicagoland’s drinking water supply? But some 16 million people depend on drinking water from Lake Michigan, in Michigan, Indiana, Illinois, and Wisconsin — what if their drinking water is rendered unsafe due to a radiological emergency at Palisades? What about the more than 40 million people, downwind and downstream, throughout the Great Lakes Basin, in eight U.S. states, two Canadian provinces, and a large number of Indigenous Nations, who also depend on the Great Lakes writ large for drinking water? The Great Lakes is 21% of the world’s surface fresh water, 84% of North America’s, and 95% of the U.S.A.’s. Palisades restart is putting this all at risk.

As Kamps stated at the August 5, 2025 meeting in Lawrence, unless emergency preparedness and evacuation planning/radiological emergency preparedness are prepared for a Chornobyl- or Fukushima-scale catastrophe at Palisades, they are not good enough. Because that is exactly what Holtec is risking unleashing by restarting the closed, 60-year old, long problem-plagued reactor, with NRC’s complicity.

Our environmental coalition’s expert witness, Arnie Gundersen, warned about such risk-taking a decade ago at Palisades:

[<https://www.fairewinds.org/demystify/downstream?rq=downstream>](https://www.fairewinds.org/demystify/downstream?rq=downstream).

Speaking of Entegy, yet another security-related scandal erupted at Palisades, this time involving fire protection, or lack thereof, nearly a decade ago. As documented by WWMT TV-3

investigative reporter, Cody Combs, and also by Beyond Nuclear's Kamps in a backgrounder, Entergy Palisades security guards had falsified fire watch logs:

<https://archive.beyondnuclear.org/safety/2016/7/9/beyond-nuclear-backgrounder-re-fire-security-risks-at-palisa.html>.

Given that 50% of all reactor core meltdown scenarios originate with fires, according to retired Union of Concerned Scientists nuclear safety director Dave Lochbaum, such fire watch log falsification is unacceptable, and very risky.

As the Beyond Nuclear backgrounder above documented, such unacceptable falsifications of fire watch logs took place at other nuclear power plants in the Entergy fleet, besides Palisades.

But then, Entergy overburdening its security guards was also unacceptable. Asking too much of its security guards in the first place was a major contributing factor to the guards' unacceptable falsification of the fire watch logs.

Why were security guards at Palisades being asked to undertake burdensome fire watch patrols, in addition to all their other job responsibilities? Because Entergy, like Consumers Energy before it, refused to implement long needed fire protection improvements, apparently in order to save money, and boost profits. In fact, in spring 2006, Consumers Energy admitted to the Michigan Public Service Commission that the expense and trouble of implementing such enhanced fire protections were one of many such reasons it had decided to sell Palisades to Entergy.

See slide #2 in particular, below, namely "Increasing NRC fees and fire protection requirements":

(May 10, 2006: Consumers Energy's briefing to State of Michigan regulators regarding its intention to sell the Palisades reactor as quickly as possible, revealing important problems afflicting the plant. Also see notes by Kevin Kamps, NIRS nuclear waste specialist, with thoughts/remarks on the briefing. <http://archives.nirs.us/reactorwatch/licensing/kampsconsbrifeinf051806.htm>.)

So first Consumers Power/Energy, then Entergy, and now Holtec, all have dragged their feet, for many decades, on implementing long overdue fire protection requirements at Palisades. A half-century after the nearly catastrophic Browns Ferry Unit 1 fire in Alabama in 1975, which prompted upgrades in nuclear power plant fire protection requirements nationwide, Holtec has recently requested that NRC allow it to kick that particular can down the road yet further, perhaps for years or even decades longer:

<https://www.federalregister.gov/documents/2025/07/18/2025-13501/holtec-palisades-llc-palisades-nuclear-plant-license-amendment-application>.

Talk about playing with fire. This is playing radioactive Russian roulette. Palisades has dodged fire risk bullets in the past. But can it continue to do so in the future?

Speaking of potentially catastrophic safety and security risks at Palisades, why not generate the 800 Megawatts-electric (MW-e) with renewables instead? While solar panels and wind turbines, or even the battery storage needed to go along with them, could suffer fires as well, such fires would not involve forever deadly, hazardous radioactive substances, which can blow downwind and flow downstream as fallout, to contaminate drinking water supplies, food chains, etc. Solar panels and wind turbines are also not high on terrorist or saboteur target lists.

Nuclear power plants, on the other hand, *are* high on such target lists. It was reported by the U.S. government's 9/11 Commission, in its *Report* on the 9/11 attacks, that Al Qaeda had initially considered attacking two nuclear facilities, including one in the Hudson River Valley of New York State. Although they didn't name it, they sure could have — that would be Indian Point nuclear power plant, then owned by Entergy, now owned by Holtec.

Dr. Ed Lyman at UCS (Union of Concerned Scientists), director of the nuclear power safety project, in 2004, reported on the horrific casualties and astronomical property damage that would occur around Indian Point, located very near New York City, if terrorists had ever successfully attacked it:

<<https://www.nrc.gov/docs/ml1233/ML12339A483.pdf>>.

Palisades is similarly vulnerable to terrorist attack. It is located on the very edge of Chicago's drinking water supply, Lake Michigan. It is located in a key breadbasket in Michigan's agricultural sector, Van Buren County. It is very unclear that Palisades' security plans can detect, deter, or defend against a terrorist attack, or that the emergency preparedness and evacuation planning/REP, that would be triggered by a successful terrorist attack, are adequate to deal with the catastrophic radioactive aftermath, perhaps out to great distances, involving countless numbers of citizens, residents, and visitors (Palisades is also located in a major tourism and recreational area, hosting such events as the annual South Haven blueberry festival, which attracts very large numbers of visitors; Palisades literally shares a fenceline with Van Buren State Park to the north, specifically its campground, with hundreds of campsites — Van Buren State Park's beach, immediately adjacent to Palisades, attracts many hundreds of beachgoers, or more, on summer weekends, and dozens, or more, of recreational watercraft, as do Lake Michigan shoreline beaches to the north and south, out to great distances.

FEMA announced at the August 5, 2025 meeting that joint exercises had just been held days earlier. This was news to public participants in the meeting. Why were these exercises not announced until after they had been held?

“Reasonable assurance of adequate protection of public health and safety” was uttered at the August 5th meeting, more than once.

Kamps commented verbally about that at the in-person meeting. He brought up NRC's “QHOs” — Quantitative Health Objectives — which he had learned about during NRC staffer Jennifer Uhle's presentation to the NRC Commissioners more than a decade ago.

NRC's QHOs deem it "allowable" or "permissible" for atomic reactor catastrophes to kill people, and for "routine releases" of hazardous radioactivity during "normal operations" to cause cancer as well.

(Such "routine releases" during "normal operations" can and do harm human health as well, as documented in this pamphlet by Beyond Nuclear's board of directors president emerita, Kay Drey in St. Louis, a 50-year and still counting anti-nuclear organizer, researcher, and writer:

[Routine Radioactive Releases from U.S. Nuclear Power Plants.](#) *An update to our comprehensive list and map of all operating U.S. reactors and where they release radioactivity into the air and water. Every nuclear power reactor dumps radioactive water, scatters radioactive particles, and disperses radioactive gases as part of its **routine**, everyday operation. **It doesn't take an accident.** Federal regulations permit these radioactive releases. Any exposure to radiation increases the risk of damage to tissues, cells, DNA, and other vital molecules, potentially causing genetic mutations, cancers, leukemias, birth defects, and reproductive, cardiovascular, endocrine, and immune system disorders. <http://static1.1.sqspcdn.com/static/f/356082/26605366/1444852853757/BN_RoutineRadioactiveReleases_Oct2015.pdf?token=zwsUExAyfOttAa88dOgh7qJ3NkE%3D>*

The pamphlet lists all reactors operating at the October 2015 press time. For an up to date track of reactors as they close, please visit our [Reactors Are Closing](https://archive.beyondnuclear.org/reactors-are-closing/) page. <<https://archive.beyondnuclear.org/reactors-are-closing/>>

In terms of reactor "accidents" (they should not be called "accidents" — they are known risks gone bad, disastrous gambles gone bad), NRC's QHOs allow for, or permit, a one-tenth of one-percent increase in the national rate of accidental deaths, attributable to the "accident" at the nuclear power plant. But there are a very large number of accidental deaths in the U.S. every year, depending on how that is defined, due to: car wrecks; drug overdoses; unexpected fatalities during medical procedures; drownings; fires; falls; the list goes on and on. A one-tenth of one-percent increase in such figures could be a very large number of individual deaths attributable to the nuclear "accident," indeed.

Take NRC's own 1982 report, CRAC-II. CRAC-II is both a computer code (titled Calculation of Reactor Accident Consequences) and the 1982 report of the simulation results performed by Sandia National Laboratories for the Nuclear Regulatory Commission. The report is sometimes referred to as the CRAC-II report because it is the computer program used in the calculations, but the report is also known as the 1982 Sandia Siting Study or as NUREG/CR-2239.

CRAC-II determined that a reactor core meltdown at Palisades could kill a thousand people via acute radiation poisoning ("peak early fatalities"), and cause an additional 10,000 latent cancer fatalities ("peak cancer deaths"). That's 11,000 "accidental" deaths that NRC's QHOs deem acceptable or permissible at Palisades, in the event of a reactor core meltdown. We do not consider that acceptable, permissible, or reasonable assurance of adequate protection of public health and safety.

CRAC-II also determined that 7,000 people would suffer “Peak Early [Radiation] Injuries,” in the event of a Palisades meltdown. Also, \$52.6 billion in property damage would occur.

Adjusting for inflation alone, to 2024 dollar value figures, this would now surmount \$175 billion. https://www.bls.gov/data/inflation_calculator.htm But what “price tag” can be put on the value of the Great Lakes?

AP investigative reporter Jeff Donn reported in 2012, in his four-part series “Aging Nukes,” that populations have soared around U.S. atomic reactors like Palisades in the past several decades, so CRAC-II’s casualty figures would now be even higher, as more people live, work, or recreate in harm’s way. <https://www.ap.org/media-center/press-releases/2012/aging-nukes-a-four-part-investigative-series-by-jeff-donn/>

Although not “accidental deaths” due to an “accident” at Palisades, it would be remiss if we did not mention NRC’s QHOs regarding cancer causation (and ultimately death, for about half of those diagnosed with cancer) from “routine” releases of hazardous ionizing radioactivity during “normal” operations of atomic reactors, including Palisades itself.

NRC’s QHOs also allow for, or permit, a one-tenth of one-percent increase in cancer rates, on top of already occurring cancer rates, across U.S. society. But of course cancer is an epidemic in the U.S. At last month’s Major League Baseball All-Star Game, everyone on the field, and in the stands, stood up, holding signs listing the name of someone they knew or loved, diagnosed with cancer, or deceased from cancer. Most of the more than 42,000 people participating held one sign, but some people held multiple signs.

About half of those diagnosed with cancer eventually die from it. Although cancer treatment is improving over time, still today a large percentage of those diagnosed with it, will die from it.

Again, we do not consider a one-tenth of one-percent increase in cancer incidence acceptable, permissible, or reasonable assurance of adequate protection of public health and safety, especially considering that around half of those diagnosed with cancer caused by “routine” emissions of hazardous ionizing radioactivity from “normal operations” at an atomic reactor like Palisades will die from it.

There is also the devilish details of the blurring of the lines between “accidental...peak early fatalities” caused by the initial stages of a reactor disaster, and the “peak cancer deaths” involving the sometimes long latency periods associated with certain radiogenic cancers, depending on the particular hazardous, carcinogenic radioactive substance in question.

For example, Sadako Sasaki died at age 12 of leukemia, a decade after she was exposed to the atomic bomb’s radioactivity in Hiroshima. She died of this latent childhood cancer despite striving to fold a thousand origami paper cranes, in hopes of earning a wish, which would have been to survive her childhood cancer. Although she did not, her story has inspired millions in the past 70 years since her tragic death <https://theelders.org/news/story-sadako-sasaki-and-hiroshima-peace->

flooding, and its aftermath), and even the George W. Bush administration (Hurricane Katrina's devastation of New Orleans, and its aftermath).

Regarding the Michigan State Police (MSP) commander's verbal presentation on August 5, 2025, we have some questions. (See the relevant slides, #18 to 24, in the FEMA slideshow linked here: <<https://beyondnuclear.org/wp-content/uploads/2025/08/8-5-25-FEMA-PowerPoint-Template-PUBLIC-MEETING-Full-deck-final.pdf>>.)

On slide #22 of 69, the MSP commander stated that Palisades was: "Acquired by Holtec International with goal to restart."

This is clearly correct. But at the time Holtec acquired Palisades, the company was still perpetrating a bait and switch trick, a con job, and a big lie. Beginning in 2020, including with the publication of its December 23, 2020 *Post-Shutdown Decommissioning Activities Report (PSDAR)*, Holtec had publicly stated it intended to ***decommission*** Palisades.

An environmental coalition, including Beyond Nuclear, Don't Waste Michigan, and Michigan Safe Energy Future, for very good reason (as is now entirely clear, as well) did not trust Holtec, not even to safely decommission Palisades, and so petitioned to intervene, and requested a hearing, in an attempt to block Holtec's takeover. <<https://archive.beyondnuclear.org/decommissioning/month/february-2021> — see all five web posts listed there.>

Environmental Law and Policy Center, as well as the Office of the Attorney General of the State of Michigan, Dana Nessel, similarly petitioned to intervene, and requested a hearing, although their focus was on the inadequacy of Palisades' ratepayer-funded Decommissioning Trust Fund (DTF) to carry out all the activities Holtec had included in the *PSDAR*. (The three-group environmental coalition had also raised this contention as well, in their petition and request, but had also raised many others, including regarding risks to health, safety, security, the environment, and public pocketbooks.)

Although the would-be environmental intervenors met NRC's arbitrarily, capriciously, and exceedingly short, strict deadline of ***20 days*** post *Federal Register Notice* to submit extensive, burdensome, labor intensive legal filings, they were made to wait for ***17 months***, without so much as a peep from NRC, at which point the Commissioners simply told them to go jump in a Great Lake.

Although MI AG Nessel's office did get some traction, the ultimate hearings on the merits of its contentions were largely held behind closed doors, supposedly to protect Holtec's proprietary trade secrecy. This made no sense, as the DTF is ratepayer-funded, and the public certainly deserves the right to know what is being done with its own funds.

The MI AG's expert witness's figure of a \$200 million shortfall, in terms of Holtec's *PSDAR* commitments, as compared and contrasted with the actual and projected value of the Palisades DTF, was made publicly accessible, however.

Our environmental coalition would guess that the shortfall is actually far larger, if a complete cleanup of radioactive contamination, to a level protective of human and ecosystem health, is the goal.

The environmental coalition's distrust of Holtec was borne out, on September 9, 2022. On that date, alongside MI Gov. Whitmer, Holtec publicly announced it would restart Palisades, rather than decommission it. <<https://www.michigan.gov/whitmer/news/press-releases/2022/09/09/whitmer-announces-plan-with-holtec-to-reopen-palisades-plant>>

But, that decision had actually been made by July 5, 2022 (just a week after taking over at Palisades, on June 28, 2022, supposedly to decommission it), at the latest, when Holtec secretly applied to DOE for many billions of dollars in public funds to restart Palisades, laying out its strategy for doing so. Beyond Nuclear eventually got hold of that secret, smoking gun document, through a Freedom of Information Act Request to the State of Michigan, and exposed the Holtec big lie, con job, and bait and switch trick's devilish details, in an October 16, 2023 expose: <<https://beyondnuclear.org/5775-2/>>. Thus, Holtec had acquired Palisades "with [the] goal to restart," but lied about it for two years, from 2020 to 2022, when it finally revealed the truth. Given such a big lie at the get-go, the public does not trust Holtec to restart or operate Palisades safely, securely, or in a way protective of human health and the environment, nor to play such a central role in emergency preparedness and evacuation planning. Reasonable assurance of adequate protection of public health and safety is in very serious doubt. At this point, the only way to strive to achieve reasonable assurance of adequate protection of health and safety is to keep Palisades closed for good, as it has been since May 20, 2022. Of course, ever then, robust EP/EP/REP is needed, given the potentially catastrophic risks of the nearly thousand metric tons of highly radioactive irradiated nuclear fuel still stored on-site, generated from 1971 to 2022, with nowhere else to go anytime soon. In the interim, Hardened On-Site Storage should be implemented, but NRC does not require it, nor have Consumers Energy, Entergy, and now Holtec volunteered to do it, a quarter-century after the terrorist attacks of 9/11/2001. <<https://archive.beyondnuclear.org/on-site-storage/2020/8/19/principles-for-safeguarding-nuclear-waste-at-reactors-harden.html>>

But even if nuclear fuel is never again loaded into the Palisades atomic reactor core, and the nuclear power plant is never again operated, risks remain — namely, nearly a thousand metric tons of highly radioactive irradiated nuclear fuel, generated from 1971 to 2022, still stored on-site, as well as other radioactive wastes (misleadingly referred to as "low-level," which does not mean low-risk), and radioactive contamination, not to mention the still-hazardous although non-radioactive chemicals also used and stored at Palisades, and otherwise contaminating the property, such as hydrazine, to name but one. Thus, as mentioned above, emergency

preparedness and evacuation planning/REP requirements should be re-implemented, even during the decommissioning phase associated with a permanent shutdown, which we had been promised at Palisades, only for Holtec to break that promise, with a lot of help from “friends in high places,” and many billions of dollars of unwitting and unwilling taxpayer and ratepayer money, yet another form of waste, fraud, and abuse. Our environmental coalition stands by its distrust of Holtec, however, even to safely undertake decommissioning, and to make/take part in emergency preparations and evacuation plans/REP at a reactor closed for good.

On slide #23 of 69 in the FEMA slideshow presentation, the MSP commander stated “Restart approached as a full rebuild not a continuation.”

While it is not entirely clear what he meant by this, it does provide a segue to discuss multiple safety risks at Palisades that could lead, if and when Palisades is restarted, to a radioactive catastrophe necessitating a mass evacuation of the population in southwest Michigan, with repercussions beyond into other states, perhaps out to great distances.

Holtec certainly has *not* fully rebuilt Palisades. Far from it. Of the numerous major safety problems listed in Consumers Energy’s spring 2006 slideshow presentation made to the Michigan Public Service Commission, none were ever fixed by Entergy from 2007 to 2022, as NRC did not require it. Nor does Holtec appear willing to do more than minor, “band-aid” fixes, if that, on these, and numerous other, major safety risks.

The Consumers Energy list from 2006, communicated to the Michigan Public Service Commission, states:

Required significant future capital expenditures required [sic] above the routine \$20M per year, including:

Reactor vessel head replacement

Steam generator replacement

Reactor vessel embrittlement concerns

Increasing NRC fees and fire protection requirements

Containment coatings and sump strainers

<http://archives.nirs.us/reactorwatch/licensing/pg2.jpg>

The reactor vessel head has not been replaced, even after the cautionary tale of Davis-Besse’s Hole-in-the-Head Fiasco of 2002 in Ohio, which was referred to by federal agencies as the

nearest-miss since Three Mile Island Unit 2 melted down on March 28, 1979, ending in \$33 million in federal fines for Davis-Besse's owner/operator, FirstEnergy, and hundreds of millions of dollars lost in replacement power purchases, during the very long-term associated shutdown. Palisades had ordered a replacement reactor vessel closure head, from Babcock & Wilcox Canada. But when it arrived, brand new, at the Palisades site, it was found to be defective. Palisades has instead just stuck with its degraded head, ever since.

The steam generators have not been replaced. Holtec committed a rookie error by not implementing wet layup on the steam generators from 2022 to 2024 — immersing them in ultra-pure water, with anti-corrosive chemicals, such as hydrazine (itself ultra-toxic). This led to acceleration of steam generator tube degradation, and extensive new cracking. Holtec has proposed mere “band-aid” fixes, such as sleeving, and plugging, while simultaneously unplugging tubes that were plugged 35 years ago, to prevent damaging vibrations, for which Palisades' steam generator design is infamous. Environmental intervenors have challenged all this, but NRC appears poised to approve it all.

Regarding reactor pressure vessel embrittlement concerns, Palisades is tied with Point Beach Unit 2 for worst in the U.S., according to NRC in April 2013, and perhaps worst in the world, according to our expert witness, nuclear engineer Arnie Gundersen.

AP investigative journalist Jeff Donn reported (in Part I) in 2012, as part of his four-part series “Aging Nukes,” that pressurized thermal shock safety standards have been weakened repeatedly over decades. He cited it as the top example of NRC regulatory retreat. <<https://www.ap.org/media-center/press-releases/2012/aging-nukes-a-four-part-investigative-series-by-jeff-donn/>>

Regarding fire protection requirements, Holtec just requested NRC not enforce them indefinitely into the future, just like they have not enforced them for more than 50 years at Palisades, after the infamous Browns Ferry Unit 1 fire in Alabama in 1975. Palisades' lack of state of the art fire protection is especially ironic, given the scandal that plagued it in this regard, nine years ago. <<https://archive.beyondnuclear.org/safety/2016/7/9/beyond-nuclear-backgrounder-re-fire-security-risks-at-palisa.html>>

Retired Union of Concerned Scientists nuclear power safety director, Dave Lochbaum, has warned that fire scenarios are the root cause of 50% of reactor core meltdown scenarios. This makes Holtec's clear intention to continue ignoring fire risks indefinitely into the future all the more alarming.

Containment coatings and sump strainers has also not been addressed, in decades. In recent months, Holtec asked NRC to allow it to continue kicking the can down the road. Palisades is one of only a few reactors in the country with calcium silicate containment coatings, that would dissolve into a sludge, the viscosity of Elmer's Glue, clogging Palisades' way too small strainers,

and blocking Emergency Core Cooling System flow, when it was needed most, to prevent a reactor core meltdown.

Each of those above are pathways at Palisades to full blown reactor core meltdown, that have already been neglected for at least two decades, and which Holtec has asked NRC permission to continue to ignore and neglect going forward.

As if that list above wasn't exhausting enough, it is not exhaustive. Dave Lochbaum at UCS reported in 2010 that Palisades has had the worst Operating Experience in the U.S. regarding Control Rod Drive Mechanism (CRDM) seal leakage. <<https://beyondnuclear.org/wp-content/uploads/2024/03/Lochbaum-Headaches-at-Palisades-CRD-seals-new-LG2-20100716-pal-ucs-brief-leaking-crd-seals-5.pdf>>

A CRDM seal replacement job a decade ago significantly dosed nearly 200 workers. <<https://archive.beyondnuclear.org/home/2015/1/9/192-entergy-palisades-workers-exposed-to-28-r-in-month-long.html>>

In fact, the most recent CRDM seal leak, on May 20, 2022, led Entergy to close Palisades for good, 11 days earlier than planned.

The list of major safety problems at Palisades keeps going, but you get the picture — there are many pathways to a disaster, requiring emergency preparedness and evacuation planning/REP for Chernobyl- or Fukushima-scale events there. Because that is what Holtec is risking, with NRC collusion and complicity.

FEMA and other presenters on August 5th made it clear that eight years worth of EP/EP/REP training, exercises, planning and preparation were crammed into a compressed time period of just the past several months. This is not acceptable. Entergy ran Palisades into the ground, from 2007 to 2022. Especially after it announced early closure in December 2016, then scheduled for October 2018 (which was later postponed for another 3.5 years — Palisades did not close till May 20, 2022), Entergy got NRC and other federal agencies to simply effectively cancel many inspections, repairs, replacements, trainings, exercises, planning, and preparations, etc. — after all, Palisades was closing for good. This included EP and EP (emergency preparedness and evacuation planning), as well as REP (Radiological Emergency Preparedness). Until it *wasn't* closed for good any more. Hence FEMA *et al.*'s need to cram eight long years' worth of EP and EP/REP into just several short months, to accommodate Holtec's rushed schedule, which now seems clearly driven by its IPO, set for as early as January 2026. Just like a student cramming all night before an exam, because they didn't do their homework all along like they were supposed to have done/should have done, those charged with the critical role of EP/EP/REP at and around Palisades, may not even retain key knowledge and understanding, as it was just all too much to take in, in such a great big hurry, in a rushed, compressed, short period of time.

The CRAC-II figures mentioned above show how deadly, injurious, and costly a reactor core meltdown at Palisades would be. Such fire should not be played around with. No shortcuts on EP/EP/REP should be allowed. This includes not rushing it, in order to accommodate Holtec's selfish, greed-driven schedule for restart.

These risks will grow worse, if Holtec constructs and operates two SMR-300 new builds at the tiny, 432-acre Palisades site, next to the 60-year old, restarted zombie reactor. This would represent both extremes of the risk spectrum, in terms of breakdown and break-in phase risks. Infamous examples of break-in phase disasters at brand new reactors include Chernobyl in Ukraine in 1986, Three Mile Island Unit 2 in Pennsylvania in 1979, and Fermi Unit 1 in Michigan in 1966. The three reactors being side by side mean that domino-effect knock on meltdowns would be possible, as happened at Fukushima Daiichi, Japan, in mid-March, 2011.

The SMR-300s would also exacerbate the already severe radioactive waste dilemma, and its risks, at Palisades. President Obama's USNWTRB (U.S. Nuclear Waste Technical Review Board) chair, Dr. Rodney Ewing, and NRC chair, Dr. Allison Macfarlane, along with Lindsay M. Krall, reported a few years ago that "SMRs," depending on their design, will generate two to 30 times more radioactive waste, per unit of electricity generated, as do current reactors. This is due to loss of economy of scale. <<https://www.pnas.org/doi/10.1073/pnas.2111833119>>

Crazy enough, Holtec has strived to forego any EP and EP/REP at its "SMR" new builds. The question remains, will the yet to be NRC-certified SMR-300 design have an adequate radiological containment, or any such containment at all? This, despite the fact that Holtec's SMR-300 is larger than NRC's definition of "Small Modular Reactor." So Holtec has requested yet another exemption — from NRC's very definition of "Small Modular Reactor"! If NRC approves Holtec's exemption request, this would be Orwellian "Nukespeak." And dangerous, with safety forgotten, "down the memory hole." Even waiving EP and EP/REP at "SMRs" that actually fall within NRC's definition of "Small Modular Reactor" is dangerous. Waiving it at Holtec's SMR-300s is even more dangerous, given their larger size.

SMR-300s are not small. At 300 Megawatts-electric (MW-e) each, they are 4.5 times larger than the 67 MW-e Big Rock Point and Fermi 1 reactors in Michigan. Fermi 1 had a partial core meltdown on October 5, 1966, and "We Almost Lost Detroit" (John G. Fuller's 1975 book title, and Gil Scott-Heron's 1977 song title). Big Rock Point released a shocking 3+ million Curies of hazardous ionizing radioactivity, during its 1962 to 1997 operations. Much of the highly radioactive irradiated nuclear fuel generated at Big Rock Point is still stored on-site. Radioactive contamination still remains in the soil, groundwater, and Lake Michigan sediments, despite NRC's rubber-stamp for post-decommissioning "unrestricted" re-use of the site. Holtec plans to build one or more SMR-300s at Big Rock Point, despite the risks.

Of course, even if evacuations are "successful," those evacuated may never be able to go home again. There was an article many years ago, that probably appeared in the *Kalamazoo Gazette*, or

its follow on, *MLive*. It was about a local school, that was awarded a trophy, in celebration of its successful evacuation exercises. I think it was directly tied to Radiological Emergency Preparedness at Palisades. I responded with a letter to the editor, pointing out that, if the nuclear disaster at Palisades is bad enough, those students could successfully evacuate, but then never be allowed to return home again. That's not something to celebrate, really, come to think of it.

I mentioned during the verbal comment period at the August 5th meeting that I had been to Fukushima Daiichi. It was in early August 2010 (I think it was actually on Hiroshima Day, August 6, 2010), seven months before the nuclear catastrophe began there. I gave a talk in the evening, and met with city leaders from the large nuclear power plant's (six reactors on one site) host towns — Futaba and Okuma — during business hours. I met about a hundred people or more over the course of a couple days at/near Fukushima Daiichi. After the events of March 11, 2011 and following, everyone I met there is now a lifelong nuclear evacuee. They will never be allowed to go back home, except perhaps for very short visits, if that, given the hazardous radioactive contamination of the entire area, or Dead Zone.

I had lunch one day, near the front entrance of Fukushima Daiichi. It was at a brand new organic cafe, that had just opened up for business recently. The owners were very proud of their new restaurant. Their laminated menus were touching, hand drawn and hand written. I mistakenly took one with me, stacked into my pile of papers, inadvertently, as I left. I still have it. In that beautiful but tragic hand-made menu, I probably have more of their restaurant than they do, other than their memories. When the worst began to happen, on March 11, 2011, they had to flee for their very lives, from the radioactivity about to spew from the nuclear power plant. They had to abandon their just opened cafe, forever, in a great big hurry.

A speaker on the panel on August 5th in Lawrence flippantly said folks should have a “go bag,” ready to go, and an evacuation plan. At Fukushima Daiichi, at that cafe I mentinoed just above, that “go bag” may be all those evacuees would have left of their previous lives. They can never go back, now for 14.5 years and counting.

By the way, no clear instructions on where to go, and how — that is, no clear evacuation plan — was communicated during the August 5th meeting, much to the chargin of local residents in attendance, who asked repeatedly for one. None was provided.

The no-go zone around Fukushima Daiichi is 12.5 miles in radius, but should probably be much larger. The Dead Zone is even larger in the northwestern direction, given the severe fallout that contaminated that region in the days, weeks, months, years, and now decades that have folowed the beginning of the Fukushima Daiichi catastrophe.

The no-go zone around Chornobyl is even larger, 20 miles in radius — and ironically enough, even larger in radius in the northwestern direction, due to severe fallout and contamination in that particular direction. Again, Chornobyl's Dead Zone should also probably be much larger

than it is. This has been made all the worse by countless wildfires and floods in the Chornobyl area since 1986, which have spread the radioactive contamination further downwind and downstream.

The game of radioactive Russian roulette that Holtec is about to play at Palisades, that NRC has enabled, as have DOE and the State of Michigan, means that FEMA, EGLE, the host and nearby counties and Sheriff's Departments, the MSP, etc., must be prepared for a Chornobyl- or Fukushima-scale catastrophe at Palisades. They are not so prepared. Who could ever be? That is why the Palisades zombie reactor restart could be cancelled, before it is too late, before the worst happens. ***I hope I am wrong, but fear I am not.***

Hospitals and decontamination were mentioned in the FEMA slideshow. This reminds me of an incident that happened at Cook nuclear power plant, 30 miles south of Palisades, many years ago now. A worker was seriously injured when heavy, industrial crane rigging fell from a height on top of him. An ambulance took him to a local hospital. It was not realized until some time into the incident that the worker was radioactively contaminated. So his co-workers, the ambulance crew, the Emergency Room staff, etc., were all exposed to a contaminated person at close range, with no radiation shielding or other precautions (such as time limitations of exposure to the contaminated patient), until some time mid-incident, when the radioactive contamination was discovered at the hospital. It came out after the incident that the hospital only had a small number — perhaps just a single one — of contaminated patient isolation units/beds. Of course, a larger scale radiological disaster at Palisades — one at a Chornobyl- or Fukushima-scale — would require more than a single, or small number, of radiological isolation units/beds, in order to deal with it. And emergency responders and others must be better prepared to detect radiological contamination, in the environment, or even on, or even ***inside of***, the persons they are trying to help, in the event of a radiological catastrophe at Palisades.

If shelter-in-place — also mentioned in the FEMA slideshow — is ordered, instead of evacuation, Fukushima provides another cautionary tale. To the northwest of Fukushima Daiichi, towns were ordered to shelter in place, if they were beyond an arbitrary (and much too small) 12.5-mile radius from the nuclear power plant. It was then realized, weeks or even months later, that those areas were actually highly contaminated with fallout. Only then were evacuations ordered, weeks or months later than they should have been. The residents there, told by authorities to shelter in place, had been exposed to hazardous radioactive fallout, the entire time.

The initial emergency response and evacuation planning at and near Fukushima Daiichi also went off the rails quickly. As I commented verbally at the August 5th meeting, the first 50 deaths due to the botched evacuation due to the worsening situation at Fukushima Daiichi beginning on March 11, 2011 were the elderly residents of a nursing home. The nursing home staff had already evacuated, thinking emergency responders would soon arrive to evacuate the elderly nursing home residents, many of whom were bed-ridden, or wheelchair-bound. But no such rescuers ever arrived. 50 elders perished in their beds, not directly due to the radioactive fallout from

Fukushima Daiichi (that is, not from acute radiation poisoning), but indirectly. Their acute cause of death, horrifically, was simply dehydration, hypothermia, starvation, deprivation of needed medicines, and other afflictions due to their exposure to the elements, all due to their inadvertent abandonment in the earliest hours and days of the Fukushima Daiichi nuclear catastrophe. But thousands of “indirect” deaths from the Fukushima Daiichi nuclear catastrophe have since been acknowledged by the national and local governments in Japan.

In another tragic case, another nearby town’s leadership decided to evacuate residents, as no clear information had arrived from the national or prefectural government. The evacuees actually camped outdoors for one or more days and nights, during the course of their haphazard, self-evacuation. But it turned out that where they were camped just so happened to be exposed to significant hazardous radioactive fallout. And they were out in it, with little to no shelter, and with their food and water also exposed, resulting in internal exposures. Other ingestion pathways included inhalation, ground shine, etc.

Japan is relatively well prepared for EP/EP/REP, given the frequency of earthquakes there, for example. But the Fukushima Daiichi nuclear catastrophe showed that EP/EP/REP can go off the rails quickly, if the catastrophe is bad enough.

These cautionary tales from Fukushima cannot be allowed to be repeated at Palisades.

And what about agriculture? What about dairy farms and beef cattle ranches in the 10-mile EPZ, 50-mile EPZ, and even beyond? Will herds simply be abandoned, as they were around Fukushima Daiichi? One or more farmers devoted their lives to watering and feeding such abandoned herds after their abandonment, for not months but years on end, putting their own health and life at risk, due to radioactive exposures in contaminated areas, not to mention the personal expense. Some herds, that these Good Samaritans could not reach in time, simply perished en masse where they stood, due to dehydration, starvation, and exposure to the elements.

As documented during the second annual Nuclear-Free Great Lakes Action Camp held in southwest Michigan in August 2000, with a gathering very near Palisades itself, a large-scale hazardous radiation release from Palisades would, among many other things, result in the destruction of milk from 879 surrounding dairy herds, according to official State of Michigan radiological emergency plans researched at that time. Similarly, a severe radiation release from the Cook nuclear power plant just 30 miles south of Palisades would result in the ruin of 431 dairy herds. (The milk is ruined by radioactive contamination, as by Iodine-131, as well as Cesium isotopes, and perhaps others, and must be destroyed, as it is would then be hazardous radioactive waste itself.)

Dozens of white crosses representing the communities in Michigan, Indiana and Illinois that could be wiped out by a major ‘accident’ or attack at Palisades were also displayed on the beach at Lake Michigan during those August 2000 events.

See some photos, posted on the right-hand margin, here: <<http://archives.nirs.us/reactorwatch/licensing/palisades.htm>>.

The popular 2019 HBO limited historical drama series, “Chernobyl,” Adapted from Nobel Prize in Literature-winner Svetlana Alexievich’s non-fiction Voices from Chernobyl, powerfully and horrifically depicted what happened to the pet dogs in Pripyat, after their humans had been evacuated (permanently, as it would turn out). They were simply shot dead, on sight, by Soviet conscripts, roaming the streets. If they hadn’t already died of dehydration, starvation, loneliness and broken hearts at being abandoned, or radiation poisoning. I mentioned this at a public meeting co-hosted by FEMA and NRC a year ago in Benton Harbor, at Lake Michigan College.

Van Buren County is an agricultural breadbasket of Michigan. So too are Allegan and Berrien Counties. Blueberries, peaches, apples, grapes, and cherries are but the tip of the iceberg for what the area produces. How will the food chain be protected against radioactive contamination, if a disaster unfolds at Palisades? What would the losses, in addition to the risks?

Chornobyl and Fukushima Daiichi were also epicentered in agricultural heartlands. The impact on food supplies for millions of people were significant, and still are (or even billions of people, considering radiological contamination of the Pacific Ocean’s seafood supply, in the case of Fukushima). A relatively recent development is that the U.S. military has ordered large amounts of food from the Fukushima region for its service members to unwittingly consume, some of which is undoubtedly radioactively contaminated, at least to some extent, if not worse than that. How much health damage or even death will this cause amongst large numbers of U.S. service members and veterans, over time, who unwittingly consume this radioactively contaminated food?

A question: the spokesman on August 5th from the Van Buren Sheriff’s Department stated that Holtec had paid for 1.5 full-time employees (FTEs) (or one FTE, and one Part-Time Employee), joining two other FTEs already on staff, to focus entirely on EP and EP/REP demands in the past several months. Has Holtec paid for any other aspects of the EP and EP/REP exercises, trainings, etc., since it took over at Palisades on June 28, 2022? If yes, please specify. If not, what revenues are being used to pay such costs? Federal and state taxpayer money? Any ratepayer money?

If evacuees make it to a short-term shelter, how long can/will they be allowed to stay there?

What happens when short-term evacuee status turns into long-term evacuee status? How will evacuees’ needs be met in the short- and long-term? How are these timeframes defined? How will such services as shelter, food, and other basic needs be paid for? How much will it cost? Will such costs give decisionmakers pause, as to how big a radius should be ordered to evacuate, leading to injurious or even deadly exposures that should have been avoided through temporary or even permanent evacuation out to adequate distances, even if very large ones? Is safety the top priority, and health, or is cost savings, and hence comprises on the former?

Given Palisades' location, and Michigan being a peninsula surrounded by Great Lakes, as well as the Canadian border to the north and east, how will this complicate evacuation and relocation, if the catastrophe at Palisades is big and bad enough?

FEMA stated 15 to 20 staff have worked on Palisades EP and EP/REP. Van Buren Co. Sheriff's Dept. has stated four staff have worked on Palisades EP and EP/REP. Given the very heavy workload and rushed schedule, how could such relatively small teams be expected to retain all aspects of the trainings, exercises, tasks, etc. overwhelming them?

On slide #26 of 69 in the FEMA slideshow from August 5th, it states:

- *8-year REP cycle completed.*
- *40+ drills and exercises over 4 months.*

So eight years of EP and EP and REP trainings, exercises, etc. were crammed into a four-month compressed time period? How were participants expected to retain all aspects of these trainings, exercises, etc., given the overwhelming workload, volume of material, physical/mental/emotional exhaustion, etc.?

This marathon culminated with an exercise on Tuesday, July 29, 2025, that public participants at the August 5th meeting hadn't even heard about before.

The slide concludes "All exercises successfully demonstrated and evaluated."

Slide #27 makes that same claim.

During the August 5th meeting, the claims were made that no issues, and no findings, were observed.

How could this be? Is such confidence false? How could 40+ drills and exercises, crammed into four months when they should have been divided up over eight years, not result in any findings, issues, or lessons learned? Everything came off perfectly, without a hitch? But even exercises, trainings, and preparations pale in comparison to the real thing, right? Was the confidence on display on August 5th, and in the slideshow, false?

During the August 5th meeting, it was stated that 36 exercises had taken place at Palisades itself, just from November 2024 to January 2025. How were staff involved supposed to retain that much information, compressed into such a short timeframe? Given the holiday breaks (for Thanksgiving, Christmas, and New Year's, to name a few), how many exercises per week were crammed in during those few short months' time?!

It was said at the August 5th meeting that the draft report would be completed on August 8th, in record time. Why does this leave me feeling more concerned than confident? How can this rush job on EP and EP as well as REP be trusted?

This rush job was necessitated because for many long years, especially after Entergy's initial closure announcement in early December 2016, EP and EP and REP was simply neglected at and around Palisades, wasn't it? And with FEMA and NRC's blessing, wasn't it? As Palisades was going to close in the near future, first October 2018, but then not till May 2022. Such neglect of EP and EP and REP, combined with Holtec's sudden reversal, from decommissioning to restart, has led to this rush job, this cramming for the test. This isn't a very good approach to assuring safe, sound, solid and trustworthy EP, EP, and REP, truth be told, is it? This rush job and cram session is all the more unacceptable and outrageous, in that it seems to be driven by Holtec's IPO coming up as early as January 2026.

At one point during the August 5th public meeting, a FEMA official said out loud "...if this was an actual public meeting...". What about the public meeting wasn't "actual"? This seems to have been a strange Freudian slip. The public certainly deserves a longer time to comment, for one thing, with longer advance notice, more outreach, and more public meetings over the large area in harm's way of Palisades restart, etc.

The August 5th public meeting itself was inadequate. Only a small number of members of the public attended. How did FEMA and other agencies announce the public meeting? Clearly, a good enough job was not done, given the small turn out. Far from it.

It was announced at the August 5th public meeting that an NRC report (presumably on EP and EP and REP) would be published by September 12, 2025. Again, what's the rush? Holtec's IPO?!

Nuclear safety and radiation health protection is currently under attack and is in free fall in the U.S., compliments of the Trump administration's executive orders, deregulation, DOGE chainsawing, etc. But so too due to the ADVANCE Act, passed by Congress, and signed into law by President Biden, in 2024. This makes the risk of a disaster at Palisades more likely, perhaps significantly so, and its impacts more injurious or even deadly, for the very large number of persons in harm's way.

The best EP and EP and REP is to not restart Palisades, nor to build and operate SMR-300 new builds on the site.

Highly radioactive irradiated nuclear fuel was transferred from the indoor wet storage pool, to dry cask storage, from December 2024 to April 2025, Holtec revealed in a press release in April 2025, as mentioned above. This was done without any officially certified EP, EP, or REP on the books, as the FEMA slideshow itself documented. That is, Holtec had requested NRC end EP, EP, and REP requirements at Palisades, on July 11, 2022, and NRC eventually approved this

change. Such dangerous activities as moving heavy loads over/around the indoor wet storage pool, such as irradiated nuclear fuel transfers, demand that officially certified EP, EP, and REP be in place. After all, they could trigger an emergency, demanding a large-scale evacuation of the surrounding population, and many other measures. Holtec's transfer of irradiated nuclear fuel from the pool to dry cask storage without officially certified EP, EP, and REP in place first, was outrageous, unacceptable, and unnecessarily risky. How could FEMA and NRC allow Holtec to do this? It makes a mockery of EP, EP, REP, and applicable laws and regulations.

Why were no written materials available at the August 5th meeting? Some local residents brought EP/EP/REP calendars mailed to them by a nuclear operator/owner in the area — perhaps by AEP /IN-MI Power at Cook?

Why were such calendars, specific to Palisades, not made available at the August 5th meeting?

Why was potassium iodide distribution or availability not mentioned during the August 5th meeting, nor in the slideshow? Isn't this an essential form of protection for human thyroid glands from radioactive Iodine-131 and -129, released in large amounts during reactor meltdowns?

Ironically enough, even without a meltdown, there is evidence of elevated thyroid pathology near Palisades. The Palisades Park Country Club, according to engaged residents, has 50 thyroid cancers diagnosed in its community. With a peak summertime population of just 2,000 to 3,000, there should not be a single thyroid cancer diagnosis, given the rarity of the disease. 50 is a shocking number, in such a very small community, which happens to be located immediately south of the Palisades atomic reactor, begging the question, did Palisades cause this reported thyroid cancer epidemic in PPCC?

A PPCC resident put a face on cancer, listing themselves and several members of their own immediate family as suffering from cancer, or even having succumbed to cancer.

Why were no specifics as to evacuation routes provided at the meeting, even despite direct requests for such from local residents?

The lack of detailed and written EP/EP/REP instructions and materials at the August 5th meeting was alarming, confusing, and major oversight/failure. Along the same lines, why was Potassium Iodide not made available for distribution at the August 5th public meeting, given Palisades' apparently imminent reactor restart?

What plans are in place to evacuate the Van Buren State Park campground, beach area, forested dunes, and lakeshore/waterfront swimming areas, in the event of a radiological emergency at Palisades. On a summer weekend, how many people typically recreate at Van Buren State Park? As some will be visitors from outside the local area, how would they even know that the

Palisades nuclear power plant is located immediately next door, let alone what they are supposed to do to protect themselves and their families during a radiological emergency?

What about the added complications of a winter time emergency at Palisades, given the severe winter weather, including “white out” blizzards, icy roads, dangerously cold temperatures, etc., that all too often happen on southwest Michigan’s Lake Michigan shoreline in the winter?

Why not simply replace Palisades (that is, keep it closed for good) with safe, clean, cost-effective renewables, such as wind and solar, combined with storage and efficiency? EP/EP/REP would not even be required, at/near/around such renewable energy installations, and their complementary storage and efficiency installations.

ADDITIONAL COMMENTS, UPON REVIEWING THE FEMA SLIDESHOW AFTER THE AUGUST 5TH MEETING:

Holtec has hidden out behind its “decommissioning status” for several long years now — June 28, 2022 to the present, and still counting. This has exacerbated the risks of restart. The neglect of Emergency Preparedness/Evacuation Planning/Radiological Emergency Preparedness (EP/EP/REP) by Entergy, with NRC’s blessing, from December 2016 to May 2022, followed by similar neglect by Holtec and NRC, until very recently, is what led to this rush job, this “all night cram for the exam session,” of the past many months. Eight years of REP trainings, exercises, etc., crammed into a few short months. What could possibly go wrong?!

Given the reactor and radioactive risks from 2016 to June 10, 2022 (the date fuel was entirely removed from the reactor core, into the indoor wet storage pool — supposedly for the last time ever, but alas), and the lingering radioactive waste risks even after supposedly permanent reactor shutdown and defueling, means EP/EP/REP should never have been discontinued. The crush and rush and cram to re-establish it in recent months is a direct result of that unacceptable previous long-term neglect. It raises doubts that southwest Michigan is actually ready for a radiological emergency at Palisades, or if these rushed/crushed/crammed activities, at least to some extent, were merely “check-the-box” hurried exercises, in certain cases.

Despite multiple requests from local residents at the August 5th public meeting, no written materials or instructions re: EP/EP/REP were available in the room, nor linked in the slideshow presentation. Concerned local residents still do not know what, exactly, they are supposed to do, to protect themselves and their families, in the event of a radiological emergency at Palisades.

Little to no clear guidance in such regards was provided.

We do not want Palisades to restart. In that sense, we do not want the steam generators replaced. If the reactor is never again loaded with fuel, and operated, no EP/EP/REP related to reactor operations will be needed. But of course Holtec insists on restarting, and NRC is letting them,

despite the risks, so reactor-related EP/EP/REP is necessary, unfortunately. And, of course, EP/EP/REP related to radioactive waste will still be needed, regardless of zombie reactor restart, and regardless of SMR-300 new builds, although these would exacerbate the radioactive waste risks going forward.

But EP/EP/REP would still have been needed, and is needed, given the highly radioactive irradiated nuclear fuel still stuck at Palisades, in on-site storage, indefinitely into the future. Nearly a thousand metric tons was generated from 1971 to 2022. EP/EP/REP never should have been ended at Palisades, even after permanent shutdown of the reactor on May 20, 2022, and its permanent defueling on June 10, 2022. Of course now, Holtec plans to load new fuel and restart the reactor, in the not too distant future. This is a very risky mistake.

Holtec's rush job to restart seems to hinge on its IPO, slated for January 2026. This makes the EP/EP/REP eight years worth in a few months time rush job and cram session even more outrageous and unacceptable.

Slide #12's August 8th deadline for public comment is clearly a typo. It should read August 15th. This is a reflection of the rush job. But even a nine day public comment period for additional written comments beyond the August 5th meeting is woefully inadequate. The public has also been forced to rush, to meet Holtec's rushed schedule. Most members of the public do not even know about this proceeding, or this arbitrarily short public comment period.

The problem with such rushed EP/EP/REP re-establishment is, it means certain aspects of it were not done very carefully, it would seem. That can create serious problems if the worst happens at Palisades, and robust EP/EP/REP is needed, but is in fact found to be poorly planned and prepared, resulting in poor execution in real time, which can cost lives, perhaps large numbers of lives (11,000 to be exact, but as stated above, this is a low-ball figure, given population growth around Palisades in the past 43 years), as NRC's 1982 CRAC-II report reveals is all too possible.

On slide #16, the plume exposure pathway EPZ is not defined. This is not helpful.

A 5-mile figure is mentioned. What about 10 miles? What about 50 miles? What about more than 50 miles? Sheep farms in Scotland had to have radiological controls for decades after Chernobyl fallout radioactively contaminated them in 1986. Scotland is thousands of miles from Chernobyl, not 5, 10, or 50 miles away. Scotland was not the only direction in which Chernobyl fallout blew to and arrived on the ground and surface waters, in significant amounts and concentrations, causing repercussions for decades, or perhaps even centuries, into the future, depending on the radioactive substance, its half-life, and its hazardous persistence.

On Slide #21, why aren't the closed reactors at Big Rock Point or Fermi 1 mentioned? The dry casks at Big Rock Point — eight of them, holding highly radioactive waste — could still unleash a disaster in the northern Lower Peninsula. Fermi 1 actually had a sodium fire, around 2008,

decades after its permanent closure, as well as new tritium leakage. Given the hazards of such radioactive waste and contamination, why are Big Rock Point and Fermi 1 excluded from MSP EP/EP/REP consideration? Nuclear disasters could still unfold at these sites, decades after the reactors closed for good (in 1972 at Fermi 1, in 1997 at Big Rock Point).

Slide #23 speaks of “coordination,” which has a positive connotation. But it could also be regarded as “collusion,” which the Japanese Parliament concluded in 2012 was the root cause of the Fukushima Daiichi nuclear catastrophe that had begun a year earlier. We should not normalize nuclear risks of catastrophe, as through EP/EP/REP — Palisades should stay closed, and its electricity supply quickly, genuinely cleanly and safely, as well as reliably, and cost-effectively, replaced with renewables, like wind and solar, combined with storage and efficiency. Those do not require EP/EP/REP, like nuclear power does, like Palisades’ zombie reactor restart and “SMR” new builds do.

Also, the “Regulatory Path” mentioned has been *ad hoc*, cobbled together, and made up out of thin air as Holtec and NRC went along, in collusion, for the past 2.5 years or even longer. This adds to the safety, security, health, and environmental risks. Regulations have been made a mockery of in this restart scheme process, largely driven by senior “partner” Holtec, who says what will happen when, but enabled by “junior” partner NRC’s complicity, and collusion, which exists in spades at Palisades.

“Partners” was actually explicitly mentioned on this slide. Given the unnecessary risks, we see such “partnership” as collusion. These risks are not necessary. They are being imposed on the citizens and residents of southwest Michigan, so that Holtec can make a buck. It’s not acceptable. It’s not tolerable.

The risks taken, and health sacrifices made, by emergency responders at Chernobyl in 1986, and at Fukushima Daiichi in 2011, should be borne in mind. They, along with nuclear workers, were the first to die at Chernobyl, as from acute radiation poisoning.

On slide #25, obscure acronyms are not spelled out, including IPAWS, WEA, and EAS. This REP cant or jargon is not spoken by most to any members of the concerned public. Such acronyms should be spelled out at first usage. Acronyms can and should only be used thereafter.

Re: slide #26, again, 8 years of REP, crammed into just a few months, is not acceptable, or advisable REP best practice, by a long shot.

Entergy not only ran the physical plant into the ground from at least December 2016 (if not even earlier) to May 2022, it also neglected EP/EP/REP for that long, or even longer. Holtec cannot be allowed to similarly kick safety, security, health, and environmental cans down the road.

40+ exercises over 8 months, averages out to 5 exercises per month over the course of 8 months, or more than one exercise per week, over the course of 8 months. This is too much. Skill and knowledge retention was undoubtedly decreased by forcing participants to “sip out of a fire hose,” as the saying goes. Cramming for an exam the night before, after having neglected to do one’s homework all semester, means expected and desired retention will be decreased, even if the test is passed.

The security-related video presentation made by the Berrien County Sheriff’s Dept. during the August 5th meeting is what led to my comments about security related EP/EP/REP made above. Security failures as a cause of a radiological emergency at Palisades is a deep concern, and long has been.

Slide #29 of 69 claims that “Restart approached with same rigor as a new plant.” This is false. NRC cannot be counted on to do its job, to fulfill its mandate, of protecting human health, safety, and the environment. NRC is captured by the industry it is supposed to regulate. It is in collusion with industry. But so too are other government agencies. Such collusion can lead to a nuclear catastrophe, as shown at Fukushima Daiichi, a conclusion reached by the Japanese Parliament itself in early 2012.

NRC’s capitulation to industry has been made even worse, by the ADVANCE Act of 2024, Trump’s 2025 Executive Orders, DOGE chainsawing and pressure, etc. Safety, security, health, and environment could well pay the price.

NRC Commissioner Bradley Crowell told the *ExchangeMonitor* in February 2023 that to restart Palisades, Holtec should have to “start from scratch,” as if they were obtaining a brand new operating license for a brand new atomic reactor. This did not happen. Far from it. Instead, many unsafe aspects of Palisades, dating back 60 years, are being allowed to go forward, grandfathered in, unaddressed yet again.

Take the bad metallurgy in the welds at the Reactor Pressure Vessel mid-line. This is why neutron embrittlement at Palisades is so dangerously bad. Such metallurgy was corrected in younger atomic reactors at a later point in time, after lessons were learned by making mistakes at earlier reactors like Palisades. But the meltdown risk is baked in at Palisades. It will now grow worse with restarted operations.

Take the bad metallurgy in the current Palisades steam generators, installed in 1990 to 1991. They were actually fabricated in the early 1970s. Fortunately they were stored for two decades in liquid nitrogen, to prevent degradation. But this did not address the obsolete metallurgy set in stone by their early 1970s manufacture. Inconel 600 was used, which has since proven problematic and been replaced, again, in evolving recognition of earlier mistakes. Palisades’ current steam generators were also not heat treated, making them perhaps the only un-heat-treated Inconel 600 steam generators in service in the country. Palisades should not be restarted

with such problematic steam generators in service, already badly age-degraded and admittedly in need of complete replacement, yet again, by 2006, but made all the worse due to Holtec's neglect of wet layup from 2022 to 2024.

In such ways, Palisades is indeed "special," as NRC staffer Mark Kirk once put it to the NRC Advisory Committee on Reactor Safeguards, in the context of RPV embrittlement. Palisades is uniquely bad in a large number of ways. And hence our peril, with the restart.

Holtec cannot be counted on. It has never operated a reactor. It has never built a reactor. It has never repaired a reactor. It has never restarted a closed reactor, especially not one as long problem-plagued, a lemon from the get-go, and now as severely age-degraded, as is Palisades. It is inexperienced and incompetent. It is also dishonest, crooked, and even criminal. For these reasons, it cannot be trusted. For more background on Holtec's bad corporate character and track record, see:

["Holtec: Criminality, Corruption, Incompetence, and Inexperience" <https://beyondnuclear.org/wp-content/uploads/2024/03/2-29-24-Holtec-two-pager.pdf>;](https://beyondnuclear.org/wp-content/uploads/2024/03/2-29-24-Holtec-two-pager.pdf)

and

[Radioactive Skeletons in Holtec International's Closet...<https://archive.beyondnuclear.org/centralized-storage/2019/7/25/radioactive-skeletons-in-holtec-internationals-closet.html>.](https://archive.beyondnuclear.org/centralized-storage/2019/7/25/radioactive-skeletons-in-holtec-internationals-closet.html)

Slide #29 speaks of "rebuilt" and "updated" REP. Why was this even necessary, if REP had been maintained throughout, as claimed? Clearly, REP suffered from significant neglect, at least from December 2016 till nearly nine years later, only to be replaced by a rush job, trying to cram eight years' worth of REP training, exercises, etc., into just a few months' time, to accommodate Holtec's schedule, namely its January 2026 IPO.

Re: Slide #41, per above, shelter-in-place northwest of Fukushima Daiichi, maintained for several long weeks or even months, beginning in mid-March 2011, was a tragic mistake. The area was severely contaminated, and should have been evacuated immediately. Residents were exposed to harmful radioactive doses for several long weeks, when they should have been evacuated to a non-radioactive location, as soon as possible.

On slide #43, "fire" is mentioned. Compare this to the request by Holtec to further delay fire protection enforcement at Palisades, even though it has already been neglected for 50 years.

On slide #44, ***"What Have We Done?"*** makes me wonder, will that question be asked, if and when the worst happens at Palisades, and the negative consequences become more clear, over a very large region downwind, downstream, up the food chain, and down the generations? Again, I hope I am wrong, but fear I am not. Holtec is playing radioactive Russian roulette at Palisades,

with collusion, complicity, and enabling provided by NRC, DOE, and other federal and state agencies. This puts the public in peril. This also puts the Great Lakes at great risk.

Slide #45 mentions evacuation routes, but such information was not provided to participants at the August 5th meeting, even though several local residents asked for it. They are still unclear what evacuation routes they are supposed to use to get away, if and when the worst happens at Palisades, after restart.

What about people who do not own cars? What public transit evacuation options exist, if any? How is this not an issue of vital energy and environmental justice, especially for BIPOC (Black, Indigenous, and/or People of Color), as well as low-income, communities in harm's way?

A "Go Bag" was mentioned. Why was no mention of the fact that one may go, with their "Go Bag," but never be allowed to return, ever again, as at Chernobyl and Fukushima Daiichi?

"Stay Informed" was recommended. We have stayed informed. That is why we are so opposed to Palisades' restart. It will put our entire Great Lakes Basin and Great Lakes State at dire risk.

Please note that these comments will be cc'd or bcc'd to every person for whom an email address was provided in the FEMA slideshow. They will also be cc'd or bcc'd to other government officials of relevance, both elected and appointed, such as Michigan's governor, state legislators, state agency employees, and their equals in the federal government agencies, congressional delegation, etc. Dr. Mary Sinclair of Don't Waste Michigan, a longtime Palisades watchdog, called this "town hall meeting by cc."

Dr. Albert Einstein said in June 1946, "To the village square, we must carry the facts of atomic energy. From there must come America's voice." Around the same time Einstein said "The splitting of the atom has changed everything, except our mode of thinking, and thus we drift towards unparalleled catastrophe." He was speaking in the context of nuclear weapons, which still haunt us with the prospect of sudden, planetary omnicide. But his words also ring true about nuclear power. A restarted Palisades zombie reactor certainly puts the Great Lakes at existential risk, or, in Einstein's words, "unparalleled catastrophe."

Slide #52: what does ALC mean? Acronyms must be spelled out at first usage.

On slide #53, many fire departments are listed. Please see my comments on the risks of fire at Palisades, how they have been neglected for 50 years, and how they will still be neglected, for years or even decades to come, if Holtec gets its way. Those very fire departments listed here could well be called upon to respond to a radiological emergency at Palisades, after all. In Ukraine, firefighters from as far away as Kiev were deployed to Chernobyl. Firefighters were among the first to die of acute radiation poisoning at Chernobyl, and in its aftermath.

In fact, more than a million so-called “liquidators” were deployed to Chernobyl, to “liquidate” the consequences of the radioactive catastrophe there. (Some cite figures of 1.2 million Chernobyl liquidators deployed, over months or even years.) These included firefighters, police officers, soldiers, nuclear industry workers and managers, miners, and many others. Many paid for their service at Chernobyl with their health, or even their very lives, not to mention disease or genetic damage passed on to their descendants.

Drs. Yablokov, Nesterenko, and Nesterenko, in the 2004 English language edition of their book *Chernobyl: The Human Health and Ecological Consequences*, published by the New York Academy of Science Press, estimated that 985,000 people had died prematurely due to their Chernobyl radiation exposures, and related causes, including many “liquidators.” Note that this figure does not account for radiogenic premature deaths that occurred after 2004, right up to the present, and continuing on into the future.

How many would sicken and die in the aftermath of a Chernobyl-scale radiological emergency at Palisades? Why are such risks even being taken in the first place? Palisades’ restart is not only unprecedented, for good reason. It is also unneeded (the lights have stayed on in the service area for the past 3+ years, after Palisades closed for good on May 20, 2022), insanely expensive for the public (Holtec has requested more than \$8 billion in taxpayer and ratepayer subsidies for the restart alone, and has requested another \$7.4 billion in bailouts for SMR-300 deployment there), and extremely high risk for safety, security, health, and the environment.

It is important to point out that contrary to helping solve the climate crisis, reactor operations at Palisades in the future will be subjected to ever more frequent, and ever more intense, extreme weather events, due to worsening climate chaos. This means risks will be worse in the future, than they have been in the past, at Palisades.

Slide #55 — the rushed EP/EP/REP was overwhelming for local emergency responders and planners. Of course it was — cramming 8 years of such activities into a short few month period is not only unreasonable, it is even dangerous. Clearly, not everything taught in the trainings, or experienced in the exercises, could be retained, by overworked, overwhelmed personnel. We should be honest, and admit that southwest Michigan, and beyond, is not ready for the potential catastrophic consequences of a Palisades zombie reactor restart. Far from it. False confidence is deceptive, misleading, not helpful, and downright dangerous.

Slide #57 mentions “legacy emergency plans.” These became dead letters, after Entergy announced retirement of Palisades, by October 2018. This announcement was made in early December 2016. After that point, Entergy requested, and NRC granted, permission to no longer worry about EP/EP/REP. After all, Palisades was closing. But of course the high-level radioactive waste is stuck there, so EP/EP/REP should never have been ended at Palisades. Now that Holtec’s IPO approaches in January, everyone is being forced to rush ahead with long

neglected EP/EP/REP. This has turned into a recipe for disaster, with rushed, woefully inadequate EP/EP/REP in place, at best.

“[T]argeted start date of October 2025” is mentioned. Since April 2022, various restart dates have been floated, from June to August, October, or December 2025. Will the actual restart date please stand up?! Clearly, Holtec’s IPO as early as January 2026 is driving this mad rush to restart. This is unacceptable, and is increasing risks, for no good reason whatsoever. Palisades should never be restarted at all, given all that is being put in peril. And for what? So that Holtec can get filthy richer?!

Re: slide #59: What is depicted in the photos? I recognize the orange traffic cones. But what are concealed in the black carrying cases? Tables? Decontamination equipment? Personal Protective Equipment (PPE) for the Sheriff’s Department deputies and other emergency responders? Potassium iodide pills? Likewise, what is in the tote boxes? These are small trailers, only two of them, not containing much by way of supplies, in volume anyway, by definition. Is this really sufficient for a Chernobyl- or Fukushima-scale radiological emergency at Palisades? We are most dubious.

Re: slide #60 and hospitals, as mentioned above, a single or small number of beds/units for radiological isolation at area hospitals is not sufficient. Given the magnitude of the radiological emergency, the effectiveness of the mass evacuation, etc., a very large number of radiological isolation beds/units could be needed.

Re: slide #68 (“August 15”) and slide #12 (“August 8”), the contradictory dates for when written public comments were due created unnecessary confusion.

The public comment opportunity should be extended indefinitely. FEMA and its various partner agencies should do significantly more public outreach, including more in-person meetings, virtual meetings, verbal and e-comment opportunities, etc. At those meetings, detailed EP/EP/REP instructions should be handed out, in hard copy format, and also made available on-line, and distributed very widely. What good is even the best possible EP/EP/REP, if most of the public doesn’t even know about it in advance of the radiological emergency?

Thank you for considering our written public comments above, and for also considering our verbal public comments at the meeting in Lawrence, MI on August 5, 2025.

—End of Public Comments—