

Arnie Gundersen ACRS Comments, 12/4/25

I have witnessed Palisades “resurrection” by Holtec for several years. Despite steam generator tube hideout damage caused by Holtec’s neglect unlike any other reactor in history, it is clear to me that the NRC will do nothing to stop Palisades from restarting.

I no longer consider the NRC to be protecting Michigan’s health and safety. The Trump Administration Executive Order requiring the NRC to speed up licensing has turned the NRC into a sock puppet for Holtec

I am sure that your committee is aware that I was retained as an expert and have, on numerous occasions, expressed well documented concerns about the deterioration of the Steam Generators. The evidence suggests that the Steam Generators will fail before the next refueling outage, releasing radiation on the State of Michigan.

And what is the response to my concerns? Holtec said that my concerns should be discounted because “*Gundersen left the nuclear industry decades ago yet continues to hold himself out as expert in nuclear power plant operations*”¹. This from a company with no operating experience! And the NRC has ignored my concerns, acting like the Moai statues on Easter Island.

¹ ASLBP No. 25-988-01-LA-BD01, APPLICANT’S ANSWER OPPOSING BEYOND NUCLEAR ET AL.’S PETITION TO INTERVENE AND REQUEST FOR HEARING, July 11, 2025. Page 19

The question remains “How much radiation will spew from Palisades when the steam generators fail?” Today’s slide 17 suggests that the NRC expects 1000 new indications if Palisades runs for 18 additional months! Rather than proving that the reactor coolant pressure boundary is safe and strong, the NRC seems content to place its faith in mitigating systems after the leak.

Is it too late to change course at Palisades? The reality is that the NRC’s Palisades train has not “left the station”. Events of the last year make it clear that the NRC’s train barreled right through the station without ever intending to stop!

