

***Verbal public comment made By Kraig Schultz, MSEF, to ACRS, on Dec. 4, 2025:***

"Good morning, and thank you for the opportunity to speak. My name is Kraig Schultz – with Michigan Safe Energy Future.

What is happening at Palisades is “novel and noteworthy”. Restarting a plant from formal decommissioning has never been done before in this country. This is completely new ground — and new ground calls for *higher* standards, not lower. A new plant would never be licensed with margins this narrow or with this level of unresolved uncertainty. Yet somehow, the first restart from decommissioning is being done with a Steam generator that has passed its age degraded cliff, and we are expecting heightened crack indications after the next operating cycle (your slide number 17)! That mismatch is the core issue.

The question before the ACRS is not whether the calculated probabilities can be made to pass. The real question is: *What should the standard be for the very first restart of a decommissioned plant?* Whatever is decided here becomes the precedent for every future attempt. This decision will shape the reputation of nuclear energy, the trust of the public, and the credibility of the regulator.

The good news is that there is no financial or political pressure to take unnecessary risk. Federal funding is available. Replacing the steam generators would bring *more* jobs and *more* economic activity, and it would set a clean foundation for the proposed SMR project next door. There is simply no reason to accept a “just-barely-adequate” performance on an issue as central as steam generator integrity.

The repair campaign was an honest effort, but noble attempts do not change physical limits. The results show that the repaired steam generators do not meet the standard appropriate for a first-of-its-kind restart.

This is the moment for the ACRS to define that standard. And if the Committee takes the conservative, prudent path, you will not be remembered as the group that slowed a restart — you will be remembered as the group that protected the long-term future of nuclear energy by ensuring the first restart was one worth emulating.

Thank you for your time."

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