Chairman Macfarlane, we are grateful for this chance to meet with you to share our concerns about Palisades. While some of our concerns predate your chairing of the NRC, we want you to understand how our attitudes about the NRC evolved and what we think the NRC can do to make Palisades safer.

I am going to review what we call “broken promises” which were made by Consumers Energy when they appealed to the Michigan Public Service Commission for permission to sell Palisades to Entergy in May of 2006. Consumers Energy argued that there were major repairs needed on the plant that they did not have the resources to make but that Entergy did have the resources to make. These included the replacement of the corroded reactor lid, replacement of degraded steam generators, and the repair of the reactor pressure vessel that was considered among 14 seriously embrittled in nuclear power plants as early as 1981 by the NRC. There were also some fire safety improvements needed, some of which may have been partially accomplished recently, but years overdue. A fire in the spent fuel pool would be disastrous. Anyway, the Michigan Public Service Commission did approve the sale of Palisades to Entergy which bought it in 2007. Now, in the 7 years since then, Entergy has not made the three major repairs that Consumers Energy implied they would. Nor do they intend to because, according to Anthony Vitale, Entergy's top official at Palisades, the NRC did not require it.

Meanwhile, during these years, from 2005 to 2007, antinuclear and local environmental groups, along with concerned local residents, were active in opposing the possibility of a 20 year extension of Palisades' operating license. Needless to say, the NRC granted the 20-year extension, as they routinely do for virtually all applications. But the NRC apparently did not require Entergy to make the repairs as a condition of its 20-year extension, even though the original owners of Palisades recognized the need for these repairs. How should we understand this? Is the NRC more interested in protecting Entergy’s profits than in protecting public safety? If Palisades is not shut down soon, Entergy should still be required by the NRC to make the repairs since Palisades is more dangerous as it ages.

Each of the major repairs needed at Palisades, replacement of the reactor lid, replacement of the steam generators, and fixing the embrittlement problems, would allow the plant to operate more safely. We have been particularly concerned with the embrittlement of the reactor pressure vessel and focused on that as we opposed the 20-year extension. As I said earlier, this was recognized as a problem as early as 1981. Then, at a meeting in South Haven in February, 2012, a scientist from the NRC, Jennifer L. Uhle, acknowledged that Palisades has the most embrittled pressure vessel in the country. The risk is that if the Emergency Core Cooling System is activated, the sudden change in temperature could crack the vessel and release radioactive steam, possibly leading to a Loss of Coolant Accident. Of course we were also assured at a subsequent meeting that the problem of embrittlement was solved, on paper, by raising the limits at which embrittlement is a danger. We were not reassured.

So we live in a threatened environment. The generation of electricity with atomic power is safe until it is not, and then the damages are too often catastrophic. The counties along Lake Michigan are second only to California in the diversity and volume of the food crops they produce. As a changing climate and drought curtails crops in California, Michigan's food production will be much more valuable than the generation of electricity. As an aging and dangerous plant, Palisades should be shut down and carefully decommissioned. But if that is not politically possible at this time, at least the promised repairs must be required by the NRC, which is charged with oversight in the public interest. Palisades must not be allowed to destroy southwest Michigan.