

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board**

In the Matter of:)	Docket No. 50-255
Entergy Nuclear Operations, Inc. (Palisades Nuclear Plant))	
Operating License Amendment Request)	December 1, 2014
)	

* * * * *

**DECLARATION OF PIERMAN, KAMPS AND KEEGAN
CONCERNING COUPON AVAILABILITY FOR PTS TESTING**

1. Bette Pierman, Kevin Kamps and Michael Keegan make the following statements under penalty of perjury.

2. On June 5, 2014, we attended a meeting in Benton Harbor, Michigan, between about a dozen concerned local residents and environmental group representatives and the Chairman of the U.S. Nuclear Regulatory Commission, Dr. Allison Macfarlane, regarding Entergy Nuclear's Palisades atomic reactor.

3. Michael Keegan, a board member of Don't Waste Michigan, addressed the coalition's concerns regarding the embrittlement of the Palisades reactor pressure vessel. He asked Chairman Macfarlane why remaining metal coupons within Palisades' reactor pressure vessel had not been pulled and tested in so many years, in order to determine the extent of neutron-bombardment embrittlement of the reactor pressure vessel.

4. NRC Chairman Macfarlane asked one of her staff members to respond to the question. Alex Garmoe, Senior Resident Inspector at Palisades, responded that coupons had not been pulled and tested in so long because so few were left. To do so would mean there would be no more to pull and test during the 2014 to 2031 extended operating license period which the NRC had granted Palisades in 2007.

5. As neither Dr. Macfarlane nor any other NRC staff member present at the meeting, including

the Region III Administrator Cynthia Pederson, spoke up to contradict Mr. Garmoe's statement, we took the statement to be the official position of the NRC. In fact, Dr. Macfarlane's written correspondence to us to follow up the in-person meeting did not mention, let alone contradict, her staff member's response.

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I hereby declare under penalty of perjury that the foregoing facts are true and correct and that any expressions of opinion are based on my judgment.

November 30, 2014
[date]

Bette Pierman
Bette Pierman

I hereby declare under penalty of perjury that the foregoing facts are true and correct and that any expressions of opinion are based on my judgment.

Dec. 1, 2014
[date]

Kevin John Kamps
Kevin Kamps

I hereby declare under penalty of perjury that the foregoing facts are true and correct and that any expressions of opinion are based on my judgment.

12/1/2014
[date]

Michael Keegan
Michael Keegan