Mr. Stephen G. Burns, Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  

Dear Chairman Burns:

Re: Palisades Nuclear Power Plant, Covert, MI  
Atomic Safety and Licensing Board Panel decisions  
Docket No. 50-255-LA-2; ASLBP No. 15-939-04-LA-BD01  
June 18, 2015, and July 9, 2015

It has been my privilege to serve The City of Grand Rapids for the last eleven years. Grand Rapids is a thriving modern city of 200,000 citizens, whose industry and imagination have made our economy the most robust in the State of Michigan.

Grand Rapids is also located within fifty miles of the Palisades nuclear power plant in Covert, Michigan. In 2007, the Nuclear Regulatory Commission granted ENTERGY, the corporate owner of Palisades, a twenty year extension of its operating permit; this despite deep concerns of local residents and environmental groups about the safety of its badly “embrittled” reactor pressure vessel (RPV). ENTERGY has now applied for “regulatory relief” from nuclear safety standards regulating the reactor pressure vessel at Palisades. The conservative safety protocols adopted in 1985, under 10CFR50.61 should be maintained especially in regard to the Palisades nuclear plant. Palisades’ reactor pressure vessel is acknowledged as the most embrittled in the U.S., and one of the oldest in the entire world.

ENTERGY’s unprecedented alternative proposal would allow Palisades to avoid testing actual samples of the facility’s most critical safety component, the reactor pressure vessel. Instead, ENTERGY would submit mathematical “interpolations” from other nuclear plants, while omitting any direct analysis of physical data taken from the Palisades reactor pressure vessel itself.

Without questioning the merits of NRC’s more recent embrittlement protocols (10CFR60.61a), I feel any alternative to physical testing of the pressure vessel at Palisades, built in 1972, does not pertain to Palisades and should not be allowed.
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The Atomic Safety and Licensing Board Panel on June 18, 2015, found that testimony documented by intervening environmental petitioners demonstrated sufficient doubt as to the integrity of Palisades’ pressure vessel. The Atomic Safety Board mandated a full evidentiary hearing regarding the safety or the embrittled pressure vessel at Palisades. As Mayor of Grand Rapids I strongly concur with this decision and urge the NRC to uphold its ASLBP Memorandum and Order of June 18, 2015. The Palisades Plant is located on the shores of Lake Michigan, the largest body of freshwater in North America, and the source of drinking water for millions of Americans.

Margins of Safety which have been built into the construction of and the regulation of nuclear power plants for many decades should not be weakened, especially in the case of critical pressure vessels at aging nuclear facilities like Palisades’ pressurized water reactor. Palisades has already exceeded its original expected life of operation, forty years. Scrutiny of the Palisades reactor pressure vessel should be strengthened not diminished, as ENTERGY proposes.

I support the recent ASLBP decision calling for evidentiary hearings into the embrittlement of the Palisades pressure vessel.

Sincerely,

George Heartwell, Mayor
City of Grand Rapids, MI

cc: Senator Debbie Stabenow
    Senator Gary Peters

   Ronald M. Spritzer, ASLBP, Chief Administrative Judge
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   Great Lakes and St. Lawrence Cities Initiative

   Mark Muhich, Sierra Club Nuclear Free Michigan