

To: The Honorable Gretchen Whitmer, Governor of the State of Michigan, P.O. Box 30013 Lansing, Michigan 48909

Also submitted via email to: migov@exec.state.mi.us, governor@michigan.gov, and governorsoffice@michigan.gov

December 7, 2020

Dear Governor Whitmer,

As you may know, Entergy has proposed selling the Palisades nuclear power plant in Covert Township, Van Buren County, to a subsidiary of New Jersey-based Holtec International, which would then be in charge of its decommissioning, radiological cleanup, and highly radioactive waste management.

(Palisades' sister reactor site, [Big Rock Point](#)

<http://archives.nirs.us/reactorwatch/decommissioning/bigrockbackgrounder272007.pdf> in Charlevoix, would be included in the sale.) There is a meeting of the U.S. Nuclear Regulatory Commission on Tuesday, December 8th, to discuss the sale. State officials and concerned citizens can attend, ask questions, and make comments. Details of the meeting are posted [here](#).

<https://www.nrc.gov/pmns/mtg?do=details&Code=20201345> [Michigan Radio has reported on the meeting](#). <https://www.michiganradio.org/post/public-meeting-about-ownership-change-palisades-nuclear-plant-comes-week>

Transferring Palisades' licenses to Holtec poses significant risks to Michigan -- in terms of health and safety, environmental impacts on the surrounding area and Lake Michigan, and in terms of its impact on the state's economy and fiscal health. [Holtec's track record](#) <http://www.beyondnuclear.org/centralized-storage/2019/7/25/radioactive-skeletons-in-holtec-internationals-closet.html> -- as well as that of its decommissioning consortium partner, [SNC-Lavalin](#)

<http://www.beyondnuclear.org/decommissioning/2019/7/26/radioactive-and-other-skeletons-in-snc-lavalins-closet.html> of Montreal, Quebec -- includes bribery, fraud, and malfeasance, as well as serious shortcomings in terms of financial assurance, technical qualifications, and decommissioning experience. A comprehensive backgrounder prepared by Hudson River Sloop Clearwater, Inc., attached [linked below], written in the context of the Indian Point, New York decommissioning saga, clearly lays this out. Simply put, there's ample reason to worry Holtec could do a superficial job of decommissioning, exhaust Palisades' decommissioning trust fund and other public monies, walk away with no liability, and leave the Great Lakes State and surrounding communities, downwind and downstream, to bear the risks and costs of a radioactively contaminated site over the long term. It's happened to other reactor communities before. This is of great concern at Palisades, given its [significant radioactive contamination of soil and groundwater](#) <http://www.beyondnuclear.org/reports/>, on the edge of Lake Michigan as well as an inland aquifer, both of which are used for drinking water by immediately adjacent communities, such as Palisades Park and South Haven.

But these risks are remediable. While the industry-captured U.S. Nuclear Regulatory Commission, unfortunately given its dereliction of duty, has sole, exclusive jurisdiction over radiological safety issues, states are not powerless. They can and should assert their authority over numerous other aspects of the license transfer and decommissioning decisions.

Attached are some briefing materials from my organization Beyond Nuclear explaining the risks that the current decommissioning business model and Holtec in particular pose to Michigan, and what the State can do to protect Michiganders from them.

It's a complex subject, but one well worth understanding. Beyond Nuclear is experienced in this area, and we're in very close touch with citizens' groups in Michigan working toward the same goal of protecting Michigan's residents, environment and economy. We'd welcome a dialogue with you on it.

I will follow up with your office in the near future. Meanwhile please see the attached, and please contact me with any questions.

Sincerely,

Kevin Kamps
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Beyond Nuclear
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(and member of the board of directors of Don't Waste Michigan, representing the Kalamazoo chapter; as well as a member of the advisory board of Citizens for Alternatives to Chemical Contamination, headquartered in Lake Township, MI)

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cc:

Garlin Gilchrist II, Michigan Lieutenant Governor

Dana Nessel, Attorney General of Michigan

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Nicole Britten, MPH, Health Officer/Director, Berrien County Health Department

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James Clift, Deputy Director, Michigan Department of Environment, Great Lakes, and Energy

Sally A. Talberg, Chairman, Michigan Public Service Commission

Daniel C. Scripps, Commissioner, Michigan Public Service Commission

Tremaine L. Phillips, Commissioner, Michigan Public Service Commission

Rachael Eubanks, Treasurer of Michigan

U.S. Senator Debbie Stabenow

U.S. Senator Gary Peters

U.S. Representative Jack Bergman (MI-1st District)

U.S. Representative Bill Huizenga (MI-2nd District)

U.S. Representative Justin Amash (MI-3rd District)

U.S. Representative John Moolenaar (MI-4th District)

U.S. Representative Daniel Kildee (MI-5th District)

U.S. Representative Fred Upton (MI-6th District)

U.S. Representative Tim Walberg (MI-7th District)

U.S. Representative Elissa Slotkin (MI-8th District)

U.S. Representative Andy Levin (MI-9th District)

U.S. Representative Paul Mitchell (MI-10th District)

U.S. Representative Haley Stevens (MI-11th District)

U.S. Representative Debbie Dingell (MI-12th District)

U.S. Representative Rashida Tlaib (MI-13th District)

U.S. Representative Brenda Lawrence (MI-14th District)

Michigan State Speaker of the House, Representative Lee Chatfield

Michigan State House Minority Leader, Representative Christine Greig

Michigan State Senate Majority Leader, Senator Mike Shirkey

Michigan State Senate Minority Leader, Senator Jim Ananich

Chairman Bryan Newland, Executive Council, Bay Mills Chippewa Indian Community

Chairman Thurlow "Sam" McClellan, Tribal Council, Grand Traverse Bay Band of Ottawa and Chippewa Indians

Kenneth Meshigaud, Tribal Chairman, Hannahville Indian Community

Warren C. Swartz Jr., President, Tribal Council, Keweenaw Bay Indian Community

James Williams Jr., Tribal Chairman, Lac Vieux Desert Band of Lake Superior Chippewa Indians

Larry Romanelli, Tribal Ogema, Little River Band of Ottawa Indians

Regina Gasco-Bentley, Tribal Chairperson, Little Traverse Bay Bands of Odawa Indians

Bob Peters, Tribal Chairman, Match-e-be-nash-she-wish Band of Potawatomi Indians of Michigan (Gun Lake)

Jamie Stuck, Chairperson, Naganijek/Tribal Council, Nottawaseppi Huron Band of the Potawatomi Indians

Matt Wesaw, Tribal Council Chairman, Pokagon Band of Potawatomi Indians

Tim J. Davis, Chief, Saginaw Chippewa Indian Tribe

Aaron A. Payment, Tribal Chairperson , Sault Ste. Marie Tribe of Chippewa Indians

Attachments/Enclosures:

[Nuclear Plant Decommissioning, A New Crisis and New Opportunity for States;](http://static1.1.sqspcdn.com/static/f/356082/28380493/1607401477833/12+7+20+BN+decommissioning+fact+sheet.pdf?token=3BRTDGksP%2BfdgJQUoOeiSLzv5hs%3D)

[<http://static1.1.sqspcdn.com/static/f/356082/28380493/1607401477833/12+7+20+BN+decommissioning+fact+sheet.pdf?token=3BRTDGksP%2BfdgJQUoOeiSLzv5hs%3D>](http://static1.1.sqspcdn.com/static/f/356082/28380493/1607401477833/12+7+20+BN+decommissioning+fact+sheet.pdf?token=3BRTDGksP%2BfdgJQUoOeiSLzv5hs%3D)

[Decommissioning Trust Funds, What States Can Do to Stop Waste, Fraud, and Abuse, and Protect their Citizens;](http://static1.1.sqspcdn.com/static/f/356082/28380492/1607401286137/12+7+20+BN+DTF+fact+sheet+final.pdf?token=vi%2FEsTPZfFu3bmNddHqGy%2FARyo8%3D)

[<http://static1.1.sqspcdn.com/static/f/356082/28380492/1607401286137/12+7+20+BN+DTF+fact+sheet+final.pdf?token=vi%2FEsTPZfFu3bmNddHqGy%2FARyo8%3D>](http://static1.1.sqspcdn.com/static/f/356082/28380492/1607401286137/12+7+20+BN+DTF+fact+sheet+final.pdf?token=vi%2FEsTPZfFu3bmNddHqGy%2FARyo8%3D)

[Background Supplement to Comments by Hudson River Sloop Clearwater on Indian Point License Transfer Application from Entergy to Holtec.](http://static1.1.sqspcdn.com/static/f/356082/28380497/1607401732930/12+7+20+CW+Background+Info+on+Holtec+LTA.3.25.20+5-1.pdf?token=yQ%2BlqJIFIB6JOWLBP%2F8HrFLwXDc%3D)

[<http://static1.1.sqspcdn.com/static/f/356082/28380497/1607401732930/12+7+20+CW+Background+Info+on+Holtec+LTA.3.25.20+5-1.pdf?token=yQ%2BlqJIFIB6JOWLBP%2F8HrFLwXDc%3D>](http://static1.1.sqspcdn.com/static/f/356082/28380497/1607401732930/12+7+20+CW+Background+Info+on+Holtec+LTA.3.25.20+5-1.pdf?token=yQ%2BlqJIFIB6JOWLBP%2F8HrFLwXDc%3D)