

October 30, 2014

Dear NRC Docketing,

Don't Waste Michigan goes on record in opposition to the proposed Palisades, License Amendment Request to Implement 10 CFR 50.61 a, "Alternate Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events," dated 7/29/2014.

Palisades is the most embrittled nuclear power plant in the nation. Palisades Entergy, LLC is currently operating with a chunk of metal stuck in the bottom of the reactor. The Palisades nuclear facility is compromised in a multitude of ways that are well known and yet, unaddressed by the Utility and NRC, and with work that is deferred.

To the best of our records, Palisades exceeded technical specification regarding Pressurized Thermal Shock in 1981. Since that time standards have been pencil whipped 7 times by the NRC and methodologies have been switched out. Each time Palisades exceeds embrittlement / PTS standards, the NRC has rolled those standards back. The NRC oversight has been inadequate. If the Palisades reactor vessel fails due to PTS it will not be an accident. It will be the probable outcome to a set of circumstances which the NRC has tolerated for decades at great peril to the public. The public has no confidence in the NRC knowing what they are doing. This has become a jobs program for the NRC, perpetually kicking the proverbial can down the road with fingers crossed until it is time to retire. Stop twisting this Tiger by the tail.

Don't Waste Michigan requests that the NRC not issue a License Amendment to Palisades Entergy LLC.

Thank you.

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