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August 30, 2026

The Honorable Mike DeWine

Governor, State of Ohio
77 South High Street, 30th Floor
Columbus, Ohio 43215

Re: Great Lakes Compact Withdrawal Approval, Pioneer Units 1 and 2, NRC Docket Nos. 50-616 and 50-617, NRC-2026-0265

Dear Governor DeWine:

Ohio's Lake Erie shoreline, its commercial fishing industry, and the drinking water systems serving Cleveland, Toledo, and communities across northern Ohio depend on a Great Lakes system that the Compact was designed to protect, and the proposed withdrawal of 36 million gallons per day from Lake Michigan without Compact approval establishes a precedent directly relevant to Ohio's own Great Lakes water security.

Holtec International's Pioneer Units 1 and 2 propose to withdraw 36 million gallons per day from Lake Michigan without the Great Lakes Compact approval federal law requires and before the environmental review covering those impacts exists.

As a Technologist, I am acutely aware that in any complex system deployment, there is a required sequence which product managers and cybersecurity professionals follow. Prerequisites must be satisfied before the next phase begins. You do not deploy before you test. You do not build before the foundation analysis is complete. You do not authorize construction before the environmental review exists. The production-level impacts of skipping prerequisites are devastating.

The NRC has defined a legal order of operations for nuclear reactor deployment codified in 10 CFR Part 50 and 10 CFR Part 51.

The required sequence for this deployment:

1. File Environmental Report meeting 10 CFR 51.45 specification.
2. NRC prepares Environmental Impact Statement.

3. Draft EIS published for public comment.
4. Final EIS issued.
5. LWA issued.
6. Construction begins.

What is actually happening:

1. Environmental Report filed December 31, 2025. Four chapters. Construction impacts only.
2. NRC called it comprehensive February 27, 2026.
3. NRC initiated the EIS it should have had before acceptance: June 15, 2026.
4. NRC issued excavation wall exemption August 28, 2026. Construction begins.
5. Draft EIS: fall 2026. Not yet published.
6. Final EIS: after public comment on the draft. Does not exist.
7. LWA requested: December 31, 2026. Before the final EIS exists.

Steps 4 and 6 in the actual sequence occurred before steps 3, 5, and 6 in the required sequence were complete. Construction is beginning before the environmental review exists. This is not a procedural technicality. It is a fundamental violation of the prerequisite chain that protects public safety and environmental integrity.

The Palisades implementation is the national deployment template. How order of operations is handled in this proceeding sets the precedent for every subsequent SMR-300 deployment across the country. If construction authorization is granted before the required environmental review exists and before Great Lakes Compact approval is obtained, that sequence becomes the standard.

The attached letter has the full details on the withdrawal of 36 million gallons per day and the request for you to confirm whether Compact approval has been sought and to withhold it until the full environmental review is complete. One of my friends from years ago lives in Ohio and though I don't see her enough I think of her as I write you this inquiry.

Respectfully submitted,

January Walker

Executive, Infoton, Inc.

Planetary Information Security Officer

Petitioner, Pro Se, NRC Docket Nos. 50-616 and 50-617

Primary Source References:

Environmental Report, ADAMS ML25365A988: [nrc.gov/docs/ML2536/ML25365A988.html](https://www.nrc.gov/docs/ML2536/ML25365A988.html)

Full Application Package, ADAMS ML25365A983: [nrc.gov/docs/ML2536/ML25365A983.html](https://www.nrc.gov/docs/ML2536/ML25365A983.html)

NRC Acceptance Notice, 91 FR 9892 (February 27, 2026):

[federalregister.gov/documents/2026/02/27/2026-03943](https://www.federalregister.gov/documents/2026/02/27/2026-03943)

NRC EIS Notice of Intent, 91 FR 36015 (June 15, 2026):

[federalregister.gov/documents/2026/06/15/2026-11915](https://www.federalregister.gov/documents/2026/06/15/2026-11915)

NRC Exemption Issued August 28, 2026: [federalregister.gov/documents/2026/08/28/2026-17626](https://www.federalregister.gov/documents/2026/08/28/2026-17626)

Public Law 110-342, Great Lakes Compact: [congress.gov/110/plaws/publ342/PLAW-110publ342.pdf](https://www.congress.gov/110/plaws/publ342/PLAW-110publ342.pdf)

10 CFR 51.76(b): [ecfr.gov/current/title-10/chapter-I/part-51/subpart-A/subject-group-ECFR900488578baa903/section-51.76](https://www.ecfr.gov/current/title-10/chapter-I/part-51/subpart-A/subject-group-ECFR900488578baa903/section-51.76)

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Language Translation

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ADMINISTRATION PRIORITIES MEDIA **CONTACT**

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Thank you!

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