

January Walker

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August 30, 2026

The Honorable Tim Walz

Governor, State of Minnesota
130 State Capitol
75 Rev. Dr. Martin Luther King Jr. Boulevard
Saint Paul, Minnesota 55155

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

Dear Governor Walz:

Minnesota's economy and identity are built on the Great Lakes watershed, and a precedent set in this proceeding, that a nuclear facility may withdraw 36 million gallons per day from Great Lakes waters without Compact approval and without a completed environmental review, applies to every future withdrawal proposed anywhere in the basin, including Minnesota waters.

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. When I was in middle school I lived in Minnesota, it was the dedication of the teachers who spent so much time ensuring I knew how to math, use a T-84 calculator, was exposed to science, how to write, and all forms of technology which laid a solid skillset for the letter I write you today. Thank you to Minnesota for the foundations of education.

Respectfully submitted,

January Walker

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

Primary Source References:

Environmental Report, ADAMS ML25365A988: nrc.gov/docs/ML2536/ML25365A988.html
Full Application Package, ADAMS ML25365A983: nrc.gov/docs/ML2536/ML25365A983.html
NRC Acceptance Notice, 91 FR 9892 (February 27, 2026):
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
NRC Exemption Issued August 28, 2026: federalregister.gov/documents/2026/08/28/2026-17626
Public Law 110-342, Great Lakes Compact: 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

Summary of Information

Please confirm the information below is accurate before submitting your completed form.

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Email a message to the Governor's Office

Thank you for reaching out to the Office of Governor Walz and Lt. Governor Flanagan. We appreciate hearing your thoughts and concerns. We hope you'll continue to engage with our office as we work together to build One Minnesota.

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