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August 30, 2026

The Honorable Josh Shapiro

Governor, Commonwealth of Pennsylvania
225 Main Capitol Building
Harrisburg, Pennsylvania 17120

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

Dear Governor Shapiro:

Pennsylvania holds Compact authority over Lake Erie waters that support the Commonwealth's fishing, tourism, and municipal water supply industries, and the precedent this proceeding would establish, that a nuclear facility may begin construction and seek withdrawal authorization of 36 million gallons per day without completing the Compact review all eight Parties are entitled to participate in, affects every future large-scale withdrawal proposed in the basin.

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. I spent time travelling to Pennsylvania this last year and had the opportunity to spend a week in your beautiful area and visit with business associates. Pennsylvania You have done so much for the United States, I hope you will help continue to hold regulatory bodies to the highest standard.

Respectfully submitted,

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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

Sent in two parts due to character limit

The screenshot shows a web browser window with the address bar displaying "pa.gov". The page header includes the "Official website of the Commonwealth of Pennsylvania" and the "PA Commonwealth of Pennsylvania" logo. A navigation bar contains links for "Services", "Agency Directory", "Your Government", "Visit PA", and "News". A search bar and a "Translate" button are also present. The main content area features a white box with the heading "Online Form" and the message "Your form has been successfully submitted." Below this, the heading "Phone Number" is followed by the text "717-787-2500 is the main phone number for contacting the Governor's Office." The heading "Mail" is followed by the address: "Governor's Office, 501 North 3rd Street, 508 Main Capitol Building, Harrisburg, PA 17120".

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