

January Walker

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August 30, 2026

The Honorable Kathy Hochul

Governor, State of New York
NYS State Capitol Building
Albany, New York 12224

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

Dear Governor Hochul:

New York is home to more Great Lakes shoreline than any other state except Michigan, and the Compact approval process your office participates in exists precisely to ensure that withdrawals of this scale, 360 times the threshold requiring regional review, do not proceed without the full environmental accounting that 12 million drinking water users across the basin are entitled to receive.

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 one summer with my aunt on the east coast and she took me to New York, New York and she took me up to your tallest towers to see the world. Your city has had a lasting impact on me and everyone and would not be the same without water.

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](https://www.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

The image is a screenshot of a web browser displaying the Governor Kathy Hochul website. The browser's address bar shows "governor.ny.gov". The website's header includes the New York State logo, the text "An official website of New York State", and a search bar. The main navigation menu lists: GOVERNOR KATHY HOCHUL, PRESSROOM, ACCOMPLISHMENTS, SCHEDULE, EXECUTIVE ORDERS, LEGISLATION, ABOUT, and CONTACT. Below the navigation menu is a large blue banner with the text "Send a Message to the Governor". Underneath the banner, there is a paragraph of text: "If you are requesting information under the Freedom of Information Law, you will need to complete a [Freedom of Information Law \(FOIL\) Request](#)." followed by another paragraph: "Please note that we will be unable to process incomplete or inaccurate entries. An asterisk* indicates that the question is mandatory." Below this is a green button that says "We've received your message!". At the bottom of the page, there is a disclaimer: "Disclaimer: By submitting this form you are agreeing to receive email updates from the State of New York."

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GOVERNOR KATHY HOCHUL PRESSROOM ACCOMPLISHMENTS SCHEDULE EXECUTIVE ORDERS LEGISLATION ABOUT CONTACT

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