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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
RE: Docket No. 50-219; NRC-2018-0175
Jennifer.Borges@nrc.gov.

November 1, 2018

The New Jersey Sierra Club requests a public hearing regarding Docket No. 50-219; NRC-2018-0175, Exelon Generation Company, LLC; Oyster Creek Nuclear Generating Station. We still have question that need to answered before the Nuclear Regulatory Commission approves the transfer of the license from Exelon to Holtec. There are issues around transparency, costs and liability that need be addressed before the transfer. We don't have a position on the license transfer, but we have a lot of questions that need to be answered before it goes forwards. We are formally requesting a hearing so that these questions can be answered.

Holtec's decision to bring in subcontractors raises questions of oversight and transparency of the facility. These subsidiaries and contractors are third party and not a BPU-regulated entity. This means there won't be as much transparency involved in the process. We want to make sure that the companies involved in the purchase are doing their job.

We have questions on Holtec's new dry cask storage technology. We don't know enough about Holtec's new dry cast storage design and we should not be trialing it on the people of Ocean County. Holtec needs to prove to the NRC that taking 2.5 years to transfer the spent fuel will be safe.

We are also concerned about the shipping of the nuclear waste. Holtec's plan could involve transporting the nuclear fuel from Oyster Creek in dry casks to a nuclear storage facility in New Mexico. This nuclear waste would travel through New Jersey. We want to make sure that Holtec's transporting plan will not put our communities at risk from an accident or terrorist attack.

With Hotlec adding more third parties in the purchase and new technology that they will not disclose to the public brings questions about accountability, transparency, and funding that need to be answered. Before the NRC approves the transfer of the license from Exelon to Holtec, the public needs to be informed of these issues and that is why we are formally requesting a hearing.

If you have any questions or would like to discuss this matter further, please feel free to call me at (609) 558-9100.

Sincerely,



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Jeff Tittel

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