

Ms. May Ma  
U.S. Nuclear Regulatory Commission  
Office of Administration  
Mail Stop TWFN-7-A60M  
Washington, DC 20555-0001

Reference: NRC Docket NRC-2018-0237

Ms. May,

The above-referenced NRC docket pertains to an application currently being reviewed by the NRC to approve the transfer of the 10 CFR 50 license for the Oyster Creek Generating Station from Exelon Generation to a subsidiary of Holtec International. While the public comment period for this licensing action closed on January 9, significant new information has arisen since then that can, and should bear upon the NRC's deliberations in this matter.

On November 29, 2018, the NRC issued an inspection report to Holtec citing several violations of the NRC's regulations, two of which are being considered for escalated enforcement. On January 9, 2019, a pre-decisional enforcement conference was held at NRC headquarters to allow Holtec to provide the NRC with additional information to assist them in their deliberations and final decision on the proposed violation. I observed the entire enforcement conference by webcast. Based on the information contained in the written Holtec presentation materials and the oral presentation provided by Holtec's CEO that day, serious questions remain in my mind as to the ability of Holtec or any company affiliated with Holtec to faithfully administer a 10 CFR 50 license in accordance with the NRC's regulations.

Specifically, the potential violations identify serious and repetitive problems with the Holtec Quality Assurance program in the areas of design control, training, and corrective action. The Holtec written and oral presentations of January 9, 2019 were so dismissive of NRC's concerns that they provided no indication that Holtec's senior management understands the importance of these potential violations, the depth of the programmatic deficiencies identified, or the comprehensive actions required to achieve effective and long-lasting corrective measures. Furthermore, with their clear attempts at trying to diminish the safety significance of the problems and confuse the NRC during the enforcement conference, Holtec seems to not understand their obligations under 10 CFR 50.9 to provide materially complete and accurate information in all communications with the NRC.

The purpose of this letter is to request that the NRC delay any final decision on the Oyster Creek license transfer and any other similar license transfers to entities affiliated with Holtec (e.g., Pilgrim, Palisades, and Big Rock Point) until a final decision has been made on these violations, (including any investigation of Holtec wrongdoing by the NRC Office of Investigations) and the NRC agrees that the corrective actions have been implemented and are effective. This will allow the root causes of the Holtec violations to be appropriately factored into the license transfer decisions by the NRC.

Submitted respectfully by a concerned citizen who wishes to remain anonymous.

Copy to: John Lamb, NRC

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