

**From:** [Riverkeeper](#) on behalf of [Susan Hayward](#)  
**To:** [Docket, Hearing](#)  
**Subject:** [External\_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR  
**Date:** Thursday, February 13, 2020 9:04:21 PM

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Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications  
Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. A full site characterization has not been completed, which immediately casts a doubt on the entire report. The site characterization provides the foundational information about the site's current situation, including the extent of any contamination, needed to determine what needs to be done to decommission the site. It is highly doubtful that Holtec can accurately gauge the cost of its activities when it does not know what needs to be done.
2. The PSDAR does not even mention the Algonquin Pipeline, a giant high-pressured gas pipeline only 105 feet from critical safety infrastructure at the Indian Point nuclear plant and next to two major earthquake fault lines. Without properly considering the pipeline, Holtec cannot begin to take the necessary precautions to minimize the risk of potential pipeline explosions during the decommissioning process.
3. Similarly, the activities that are included within the PSDAR are vague to the point of meaninglessness. For example, the Report mentions the possibility that large components will be removed by barge and then loaded on rail. However, there is no discussion of possible routes, when barging would be needed, safety precautions to prevent the release of radioactive materials or accidents during the barging process, or the environmental impacts of barging. The lack of information makes it impossible to figure out what Holtec intends, and as such, it is unfathomable that accurate safety considerations and cost estimate was provided for this option.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR. It is frightening enough to be living close to an aging nuclear plant, and it is terrifying to think of a company with this reputation and lack of interest in important issues being involved in such a dangerous undertaking. Please, give the job to someone with better ideas about safety. I don't want to have to move away.

Sincerely,

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