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# PUBLIC SUBMISSION

**Docket:** NRC-2020-0021

Indian Point Nuclear Generating Unit Nos. 1, 2, and 3; Transfer of Control of Licenses and Approval of Conforming License Amendments

**Comment On:** NRC-2020-0021-0002

Indian Point Nuclear Generating Unit Nos. 1, 2, and 3; Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

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## General Comment

I strongly urge the NRC to deny the transfer of ownership of Indian Point Nuclear Point Plant to Holtec, a company that is singularly unqualified to take on the task of decommissioning a nuclear power plant. Holtec's business plan would prioritize corporate revenue over safety. Since its profits would stream from any balance of the decommissioning fund remaining after they walk away from the project, Holtec is motivated to economize wherever possible, resulting in a rushed and reckless approach, in the headlong pursuit to pocket public funds. This would benefit the Holtec board members while imperiling residents in the area, which includes not only the neighboring communities of Verplank and Buchanan but the entire region including large parts of New York City.

Further, Holtec is structured in such a way as to shield it from any liability that would result from its mismanagement of the decommissioning project. It would allow the company to operate with impunity and absolve itself from any responsibility for whatever mishaps occur from its rushed approach. Since Holtec is a private company, its balance sheets are not available to the public. However, there are legitimate concerns that the company is woefully undercapitalized for such a project. This raises the possibility that Holtec could, at some point declare bankruptcy, and depart, leaving residents facing the aftermath.

Not surprisingly, Holtec has already shown itself to be a bad actor. It filed a premature, erroneous, error-filled and improper Post-Shutdown Report, presumptuously pretending that it is already the licensee. Predictably, it grossly underestimated the cost of decommissioning. Among other things, Holtec conveniently overlooked

the matter of the 42 inch diameter explosive fracked gas pipeline that is located within 110 feet of critical structures of the power plant, built by Spectra (since bought by Embridge), which has an abysmal safety record. That alone should disqualify Holtec from getting anywhere near Indian Point. At the beginning of the end of the Age of Nuclear Power, the entire country is looking to the decommissioning of Indian Point. It is an opportunity to provide the U.S. and the world with a responsible decommissioning model.