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

Comment On: NRC-2020-0021-0001

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 do not believe Holtec and its subsidiaries are qualified to hold the licenses of the Indian Point Energy Center. I believe the Commission must reject the license transfer to ensure a safe decommissioning of Indian Point.

A matter of this magnitude and consequence is not one on which to take chances. It requires demonstrated experience and capability. Holtec lacks the experience needed to decommission Indian Point safely. Its entire nuclear "fleet" was acquired less than a year ago. It has never decommissioned a nuclear plant before; its first decommissioning job is Oyster Creek, which it acquired in July 2019. It is in effect learning on the job.

From what I have learned, Holtec's business model is based on maximally leveraging the decommissioning trust fund and taxpayer moneys for their profit. Furthermore, they have not demonstrated sufficient capitalization to complete decommissioning, especially if decommissioning costs exceed their unreliably low estimates.

As New York Attorney General Letitia James said when she filed a petition to challenge license transfer to Holtec, "Putting the decommissioning of Indian Point in the hands of a company with no experience and uncertain financial resources is very risky." I call that an understatement.

I am very concerned that in its Post-Shutdown Activities Report (PSDAR), improperly filed with the NRC as if it were already the licensee, Holtec significantly underestimated the cost to decommission Indian Point. There is no site characterization assessing current conditions on which to base an estimate. The PSDAR ignored the Algonquin Pipeline passing near Indian Point's critical components, even though its presence greatly complicates decommissioning and raises risks of ruptures and fires. Holtec acknowledged in the PSDAR that there was radioactive contamination of groundwater at the site, which is also leaking into the Hudson River. But it stated it planned to do nothing to remediate it, and will only monitor it. Nor does it plan to remediate contaminated soil any deeper than three feet. The PSDAR also stated Holtec is considering shipping large radioactive components by barge down the Hudson, which raises a host of additional unacceptable risks.

Finally, I am concerned about Holtec's conflicts of interest related to its complex subsidiary structure of separate LLCs that create incentives for Holtec NOT to be responsible to public interest and public safety in the decommissioning process. These subsidiaries may also get in the way of Holtec being held accountable for the actions that lead to its profits.

Holtec has not established the sort of credentials and reputation that this job requires, and as someone concerned with the health of the Hudson River and the region, having grown up beside it and aspiring to share its gifts with my children and grandchildren, I urge the Commission to reject Holtec as the licensee entrusted to decommission Indian Point.