

**From:** [Julie W](#)  
**To:** [Docket, Hearing](#)  
**Subject:** [External\_Sender] INDIAN POINT HEARING - adjudicatory hearing obligatory!  
**Date:** Monday, February 17, 2020 5:17:19 PM

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To the NRC:

I live 6 miles from Indian Point. We are fearful that this process might end in disaster by putting the decommission project in the hands of a questionable company, specifically: Holtec.

Here is what I've been told about this company:

- **IT HAS A CRIMINAL RECORD**
- **ITS BUSINESS MODEL IS DOING A JOB "CHEAP AND QUICK"**
- **IT IS SEEMINGLY UNAWARE OF THE NEARBY PIPELINE:** It failed to include a single mention of the "Algonquin" Pipeline system that runs under Indian Point Energy Center, including one pipeline that runs 400 feet from the control room. New York State conducted a risk assessment of the co-location of these pipelines with Indian Point and identified decommissioning activities as posing an increased risk of rupture and fire. That Holtec was seemingly unaware of these pipelines and did not include a plan to address the increased risk is unacceptable.
- **IT HAS NO PLAN TO GET RID OF THE RADIOACTIVE WATER ALREADY BENEATH THE PLANT.:** It failed to include a plan to remediate the significant amount of radioactive water already beneath the site and currently being monitored by wells around the Indian Point property. The presence of old water mains under the site and the leaks from the spent fuel pools are likely to be exacerbated by the use of heavy equipment to deconstruct the reactors and other structures.
- **IT HAS ARRANGED FOR SHELL COMPANIES WITH NO GUARANTEES TO COMPLETE:** HDI set up a series of "shell" companies to own and manage the decommissioning process. None of these companies appear to have any 'seed capital' or any guarantees on the part of HDI that would ensure their ability to complete this project.
- **ITS FUNDING IDEAS ARE QUESTIONABLE:** Because the 'shell' companies lack capital, Holtec has requested an exemption to use the Decommissioning Trust Fund to pay for waste handling. It plans to then request reimbursement from the Treasury for those expenses – which amounts to double payment for activities that are not even among the allowed 'decommissioning activities' under the applicable Federal legislation.

If even a quarter of this is true, I'm appalled. An adjudicatory hearing regarding Holtec's application is not only requested but obligatory.

Julie Woodward

