

From: [Andy Stein](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point de-commissioning
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To: US Nuclear Regulatory Commission

I am writing on behalf of the 20 million people living and working within the 50 mile radius around the Indian Point Nuclear Power Plant to request an adjudicatory hearing regarding the application.

I am most concerned about the lawless record of Holtec Decommissioning International, LLC ("HDI") - the company Entergy has chosen to sell to for decommissioning the plant.

Holtec has a criminal record and should not be allowed to do business in New York. They, themselves, manufacture the casks they want to use for high level radioactive waste storage. The casks have thin walls and are inferior to thicker walled casks used abroad. Quick and cheap is how they have done business. There is no reason to think it will be any different at Indian Point. They are currently in legal trouble in New Jersey for bribery of local officials. They have been banned from doing business with the World Bank for 10 years and **have walked out on decommissioning sites in other countries.**

In addition 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. · 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.

Also **the Post-Shut Down Decommissioning Activities Report (PSDAR) filed by was woefully inadequate: Their written report was no better.** with too many items left out -

- No referemce to the **lake of radioactive water** under the site (are they even aware of it?)
- Nedetailed information about the thin walled Holtec casks that are having so much difficulty at other reactor sites.
- The **gas pipeline that runs so near the spent fuel pools** was not even mentioned as something they would have to remediate.

Holtec's PSDAR that was seemingly unaware of these pipelines and did not include a plan to address the increased risk.

- The fact that they submitted a PSDAR prior to procuring the license says volumes about their regard for and knowledge of regulations or the unique challenges of this particular job.

A representative of the company made a presentation to citizens and not one person left the room feeling confident of the ability of this company to handle the decommissioning of Indian Point in a safe and secure manner.

Andy Stein
(917) 842-9602
271 Croton Ave
Cortlandt Manor, NY 10567