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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

Holtec and its subsidiaries are not qualified to hold the licenses of the Indian Point Energy Center. Given its record, area residents have no confidence in Holtec and do not accept it as the licensee. The Commission must not approve the license transfer, for the same reasons. Holtec has multiple problems, any one of which ought to disqualify it from decommissioning Indian Point. Taken together, they add up to a clear imperative to reject Holtec as the licensee.

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. The bulk of its experience is in spent fuel handling, where its performance has been poor.

Holtec and its subsidiaries are privately held and their finances are opaque. Their business model is based on maximally leveraging the decommissioning trust fund and taxpayer moneys for their profit. But they haven't 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." Many elected officials in New York support the AG's filing and share her objections to Holtec.