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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-2020-0021-0002

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

The NRC should reject this barebones PSDAR for Indian Point since its cursory overview fails to fulfill its basic objectives. A few of its main flaws are:

A full site characterization has not been completed, which immediately casts a doubt on the entire report. The site characterization provides the foundational information about the site's current situation, including the extent of any contamination, needed to determine what needs to be done to decommission the site. It is highly doubtful that Holtec can accurately gauge the cost of its activities when it does not know what needs to be done.

The PSDAR does not even mention the Algonquin Pipeline, a giant high-pressured gas pipeline only 105 feet from critical safety infrastructure at the Indian Point nuclear plant and next to two major earthquake fault lines. Without properly considering the pipeline, Holtec cannot begin to take the necessary precautions to minimize the risk of potential pipeline explosions during the decommissioning process.

Similarly, the activities that are included within the PSDAR are vague to the point of meaninglessness. For example, the Report mentions the possibility that large components will be removed by barge and then loaded on rail. However, there is no discussion of possible routes, when barging would be needed, safety precautions to prevent the release of radioactive materials or accidents during the barging process, or the environmental impacts of barging. The lack of information makes it impossible to figure out what Holtec intends, and as such, it is unfathomable that accurate safety considerations and cost estimate was provided for this option.