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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

The Hudson River is and has been an incredible resource for the people and communities who have lived along its banks for many millennia. It has a unique and inspiring ecosystem that is unrivaled in size, diversity and geography. As someone who worked on the river this past year, I depended on the river in so many ways. The Hudson was the basis of our education programing (it inspired art, taught us about turbidity, and sparked students' curiosity about life in the river); In the hot summer months it was a post-work shower; on days off it was a source of recreation. Not to mention the drinking water it provides to many towns and communities, the aquatic highway it serves as for many migratory species, and the home it provides for us all.

But in the last few centuries humans have used the Hudson as a dumping ground, which we see over and over again in the disappearance of native species, poor water quality, and the atrocities committed by the factories and industry along its shores. And while the river and ecosystem are looking better than they have in decades, it is not for lack of hard work, activism and lobbying by the people of the Hudson River valley. Countless hours have been given by members of the community to close the Indian Point nuclear plant, which they finally succeeded in doing. This was no small feat! But now, if the federal government allows the decommissioning licensure to transfer to Holtec and its subsidiaries, they are jeopardizing ALL the hard work this community has put into making the Hudson River a safe place for humans and fish alike.

Holtec and its subsidiaries simply 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.

Holtec is neither an honest broker nor a trustworthy partner in securing the safety and future of the region around Indian Point. 20 million people live and work within a 50-mile radius of the plant. Decommissioning it is a complex undertaking and an awesome responsibility on which the safety and future viability of our region depends. Those of us who live and work here will not passively accept an unqualified, unscrupulous company such as Holtec being put in charge of Indian Point.

It's vital that Indian Point's licensee be competent and trustworthy, free of the kind of serial malfeasance Holtec has committed, with a solid track record demonstrating it is well equipped to decommission Indian Point safely and responsibly. The Commission therefore has an obligation, statutory and otherwise, to clear the way for such a qualified candidate and reject Holtec as the licensee entrusted to decommission Indian Point.

Thank you for your time and consideration.

Anna Paritsky