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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

Decommissioning a Nuclear Power Plant properly and safely requires knowledge, expertise, and dedication. Holtec has demonstrated none of these. Our Attorney General put it well, in her license challenge, "Putting the decommissioning of Indian Point in the hands of a company with no experience and uncertain financial resources is very risky."

Why would we entrust this to Holtec, whose complex subsidiary structure of separate, undercapitalized LLCs shields it from liability and accountability. Additionally, its side businesses create perverse incentives for Holtec for example to ship radioactive waste from Indian Point to its own CIS facilities, or eventually to use Indian Point's waste or even its site to benefit Holtec's SMR business even if such choices run counter to the public interest and public safety.

Holtec and SNC-Lavalin, the two companies behind the proposed Indian Point decommissioning contractors, are embroiled in numerous scandals and controversies that tell against their claims of high standards in ethics, compliance, financially sustainable business practices and trusted stewardship of nuclear materials. Their actual record is full of corruption, bribery, fraud, pleading guilty to and paying fines for malfeasance, getting barred from doing business with the TVA and the World Bank, and misleading and lying to officials and the public.

Holtec has demonstrated dangerous incompetence in its spent fuel handling at San Onofre Nuclear Generating Station. It put costs ahead of safety when it hired unqualified, low-skilled workers at Oyster Creek and has repeatedly exhibited a pattern of disregard for public concern or input.

I wouldn't deal with such a firm, and I can't believe that you would either.