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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

Document: NRC-2020-0021-DRAFT-0244

Comment on FR Doc # 2020-03258

Submitter Information

Name: Anonymous Anonymous

General Comment

Holtec does not have the experience needed to decommission Indian Point safely. It has never decommissioned a nuclear plant before and the bulk of its experience is in spent fuel handling, where its performance has been poor.

The Commission should not approve this license transfer because Holtec and its subsidiaries are not qualified to hold the licenses of the Indian Point Energy Center. New York Attorney General Letitia James filed a petition to challenge license transfer to Holtec, saying, "Putting the decommissioning of Indian Point in the hands of a company with no experience and uncertain financial resources is very risky."

Holtec's finances are not transparent. Holtec and its subsidiaries are privately held and their business model is based on maximally leveraging the decommissioning trust fund and taxpayer moneys for their profit. They have NOT demonstrated sufficient capitalization to complete decommissioning, Holtec has significantly underestimated the cost to decommission Indian Point This is a tactic to win the contract. But what will hap [pen when the expenses are more than they estimated?

Many elected officials in New York support the AG's filing and share her objections to Holtec. The NRC should heed their concerns! :

- 1- Holtec filed a PSDAR with the NRC, although it is not yet the licensee
- 2- In the PDSAR, Holtec ignored the Algonquin Pipeline passing near Indian Point. the presence of the pipeline complicates decommissioning and raises risks of ruptures and fires.
- 3-In the PDSAR, Holtec noted that there is radioactive contamination of groundwater at the site.Tthis

contaminated water is leaking into the Hudson River. Holtec stated that it does not plan to remediate it, only monitor it. This is completely unacceptable.

4- The PDSAR states that Holtec does not plan to remediate contaminated soil any deeper than three feet. This is also completely unacceptable.

5- The PSDAR indicates that Holtec is considering shipping large radioactive components by barge down the Hudson. The risk of doing this is totally unacceptable.

Twenty million people live and work within a 50-mile radius of Indian Point. Safety during and after decommissioning is of the utmost importance!!

It is imperative that Indian Point's licensee be competent and trustworthy. Holtec is NOT trustworthy. Neither is SNC-Lavalin. Both have been named in many scandals and controversies. Their claims of high standards in ethics, compliance, financially sustainable business practices and stewardship of nuclear materials have been shown untrue, given their behavior. Their actual record demonstrates bribery, fraud and corruption. They have plead guilty to claims of malfeasance and have paid fines for same. They have been barred from doing business with the TVA and the World Bank, and have been accused of misleading and lying to officials and the public.

Holtec has placed profits over safety and ignored public concern by hiring unqualified, low-skilled workers at Oyster Creek. Holtec has shown negligence and incompetence (engineering failures) in handling spent fuel at San Onofre Nuclear Generating Station.

Please do NOT allow Holtec to decommission Indian Point. The health of millions of people and our environment depend on finding a company that is more honest, responsible and skilled to decommission Indian Point. Please find a qualified company to do this job. Please protect all the people who live and work nearby.

Thank you,
M. Kosstrin