

From: [Riverkeeper](#) on behalf of [Lili Jackson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 24, 2020 3:18:10 PM

Feb 24, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

LiLi Jackson

BROOKLYN, NY 11222-1741
lilijackson@mac.com

From: [Riverkeeper](#) on behalf of [Mary Heller](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 23, 2020 9:46:09 PM

Feb 23, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mary Heller
24 Thornwood Dr
Poughkeepsie, NY 12603-4633
maryheller211@hotmail.com

From: [Riverkeeper](#) on behalf of [Matthew Lipschik](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 23, 2020 1:14:06 AM

Feb 23, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Matthew Lipschik
1780 E 13th St
Brooklyn, NY 11229-1956
vze2xv5n@verizon.net

From: [Riverkeeper](#) on behalf of [Nancy Ward](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 22, 2020 5:12:59 PM

Feb 22, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Nancy Ward
520 E 81st St
New York, NY 10028-7095
nancyward520@gmail.com

From: [Riverkeeper](#) on behalf of [alyson shotz](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 22, 2020 12:42:30 PM

Feb 22, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

alyson shotz
248 Creamer St
Brooklyn, NY 11231-3813
theobabka@gmail.com

From: [Riverkeeper](#) on behalf of [O. Biener](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 22, 2020 12:12:08 AM

Feb 21, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

O. Biener
30-47 31 st
Astoria, NY 11106
of321@hotmail.com

From: [Riverkeeper](#) on behalf of [Tina Pelikan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 21, 2020 4:40:39 PM

Feb 21, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Tina Pelikan
46 W 95th St
Apt 8d
New York, NY 10025-6719
tinapelikan@gmail.com

From: [Riverkeeper](#) on behalf of [Nydia Leaf](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 21, 2020 4:11:15 PM

Feb 21, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Nydia Leaf
46 W 95th St
Apt 3b
New York, NY 10025-6718
nyleaf13@gmail.com

From: [Riverkeeper](#) on behalf of [Dora Nuetzi](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 21, 2020 11:10:40 AM

Feb 21, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since it has not checked all the items mentioned below. As a neighbor I am concerned about the future.

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Gratefully,
Dora Nuetzi
10 Pinesbridge Road
Maryknoll, NY 10545

Sincerely,

Dora Nuetzi
PO Box 311
Maryknoll, NY 10545-0311
dnuetzi@mksisters.org

From: [Riverkeeper](#) on behalf of [Art Shervs](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 21, 2020 9:10:26 AM

Feb 21, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Art Shervs
302 Windsor Pl
Brooklyn, NY 11218-1259
lodemidiquail@yahoo.com

From: [Riverkeeper](#) on behalf of [Alix Keast](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 9:09:53 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alix Keast

10025
alixk3@gmail.com

From: [Riverkeeper](#) on behalf of [Victoria Oltarsh](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 9:09:51 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Victoria Oltarsh
16 Washington St
Nyack, NY 10960-3043
victoriatheaterarts@gmail.com

From: [Riverkeeper](#) on behalf of [George Riggs](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 8:15:15 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

George Riggs
269 Watch Hill Rd
Cortlandt Manor, NY 10567-6433
griggs2@optonline.net

From: [Riverkeeper](#) on behalf of [Joe Quirk](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 7:39:44 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joe Quirk
147 Avenue A Apt 2r
New York, NY 10009-4998
jqquirk66@gmail.com

From: [Riverkeeper](#) on behalf of [Joyce Frohn](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 6:39:39 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joyce Frohn

54901
ahengst1@new.rr.com

From: [Riverkeeper](#) on behalf of [Ruth Nervig](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 6:09:38 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Ruth Nervig
426 Eastern Pkwy Apt 2a
Brooklyn, NY 11225-1424
nervig@gmail.com

From: [Riverkeeper](#) on behalf of [Satya Vayu](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 6:09:36 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Satya Vayu

97215

satyavayu@gmail.com

From: [Riverkeeper](#) on behalf of [Robert Fuhrer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 5:39:34 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Robert Fuhrer
513 Viewpoint Ter
Peekskill, NY 10566-6209
rmfuhrer@optonline.net

From: [Riverkeeper](#) on behalf of [Michael Wilson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 5:39:34 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michael Wilson
438 12th St Apt 2e
Brooklyn, NY 11215-5190
mikew22@gmail.com

From: [Riverkeeper](#) on behalf of [Elaine Caccoma](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 5:39:32 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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 the scope of what needs to be done.
2. No mention by PSDAR of 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Elaine Caccoma
1502 Patrician Ct
Peekskill, NY 10566-4867
ecaccoma@gmail.com

From: [Riverkeeper](#) on behalf of [Beth Darlington](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 5:09:49 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Beth Darlington
124 Raymond Ave # 323
Poughkeepsie, NY 12604-0001
bedarlingon@vassar.edu

From: [Riverkeeper](#) on behalf of [Rick Wood](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 5:09:41 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rick Wood
PO Box 803
Burdett, NY 14818-0803
rw69@cornell.edu

From: [Riverkeeper](#) on behalf of [susan downes](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 5:09:30 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

susan downes
5807 Liebig Ave
Bronx, NY 10471-1949
susan_downes@rd.com

From: [Riverkeeper](#) on behalf of [K.D](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:44:14 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

I believe the NRC must reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives.

A few of its main flaws are:

1. 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.
2. 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.
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4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site

for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

As outlined in the PSDAR, Holtec has everything to gain and nothing to lose by shifting all risk onto the public.

Please don't let this plan become reality. I implore you to reject this unacceptable PSDAR.

Sincerely,

K D

10533
kd55142p@pace.edu

From: [Riverkeeper](#) on behalf of [Robert Fursich](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:44:06 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Robert Fursich
9 S Longfellow St
Hartsdale, NY 10530-1348
rof9038@nyp.org

From: [Riverkeeper](#) on behalf of [Jean Brennan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:39:43 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jean Brennan
17 Dutchess Ter
Beacon, NY 12508-1715
jeanbrennan@mac.com

From: [Riverkeeper](#) on behalf of [Victoria Furio](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:39:41 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

As far as I understand, Holtec's PSDAR for the Indian Point power plant contains many flaws. The NRC should NOT approve it because:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Victoria Furio
37 Highland Ave
Apt 2
Yonkers, NY 10705-7625
vjfurio@cs.com

From: [Riverkeeper](#) on behalf of [Thomas Rowan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:39:28 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Thomas Rowan
766 Brady Ave
Apt 635
Bronx, NY 10462-2725
t.rowan@mail.com

From: [Riverkeeper](#) on behalf of [Donald Shaw](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:39:28 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Donald Shaw
1207 Almond St
Syracuse, NY 13210-2734
donshawcats@mac.com

From: [Riverkeeper](#) on behalf of [Dr. Edward Kush](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:39:27 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Dr. Edward Kush
PO Box 1360
Water Mill, NY 11976-1360
edkush@hamptons.com

From: [Riverkeeper](#) on behalf of [J. Beverly](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 4:09:24 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

J. Beverly

61801
jbeverly@illinois.edu

From: [Riverkeeper](#) on behalf of [Soretta Rodack](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 20, 2020 2:44:50 PM

Feb 20, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Soretta Rodack
310 E 6th St
New York, NY 10003-8705
jasparmom@aol.com

From: [Riverkeeper](#) on behalf of [Lily Mleczo](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Wednesday, February 19, 2020 9:51:29 AM

Feb 19, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lily Mleczko
2465 Palisade Ave
Bronx, NY 10463-6209
lmleczko@wcs.org

From: [Riverkeeper](#) on behalf of [Amy Harlib](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Wednesday, February 19, 2020 3:51:51 AM

Feb 19, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Amy Harlib
212 W 22nd St
Apt 2n
New York, NY 10011-2707
amyharlib@e-activism.com

From: [Riverkeeper](#) on behalf of [Doug Couchon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Wednesday, February 19, 2020 1:51:36 AM

Feb 19, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Doug Couchon
109 Foster Ave
Elmira, NY 14905-2415
dcouchon@yahoo.com

From: [Riverkeeper](#) on behalf of [Anne Marie Bucher](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 7:56:08 PM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Sincerely,

Anne Marie Bucher
1653 Bayview Ave
Bronx, NY 10465-1009
annemarie@ophope.org

From: [Riverkeeper](#) on behalf of [Marc Happel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 1:49:39 PM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

This cannot move forward.

Marc Happel
PO Box 156
Chelsea, NY 12512

Sincerely,

Marc Happel

12512
marchappel@optonline.net

From: [Riverkeeper](#) on behalf of [Marianne Makman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 1:19:39 PM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marianne Makman
46 Rogers Dr
New Rochelle, NY 10804-1013
mmakman@mac.com

From: [Riverkeeper](#) on behalf of [David Zweig](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 12:20:18 PM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

David Zweig
20 Riverview Pl
Hastings ON Hudson, NY 10706-1006
dave@davidzweig.com

From: [Riverkeeper](#) on behalf of [Kinnan O'Connell](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 12:20:15 PM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

This project must be undertaken by a responsible, reputable and experienced operator. Holtec has demonstrated that it is not any of those things. Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kinnan O'Connell
81 Willow Ave
Larchmont, NY 10538-3518
koconnell@landmarkapp.com

From: [Riverkeeper](#) on behalf of [Karen Rubino](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 11:20:09 AM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Karen Rubino
113 Iceland Dr
S Huntington, NY 11746-4231
rubino113@aol.com

From: [Riverkeeper](#) on behalf of [Marcel Barrick](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 11:20:07 AM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marcel Barrick
378 Grand St
Newburgh, NY 12550-3612
marcelbarrick@gmail.com

From: [Riverkeeper](#) on behalf of [David Slavin](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Tuesday, February 18, 2020 8:49:53 AM

Feb 18, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

David Slavin
140 Riverside Dr # 1k
New York, NY 10024-2605
baridavid4@hotmail.com

From: [Riverkeeper](#) on behalf of [MARGARET BRADBURY](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 9:48:23 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,
Margaret Bradbury
54 Maplewood St
Larchmont NY 10538

Sincerely,

MARGARET BRADBURY
54 Maplewood St
Larchmont, NY 10538-1633
marg_bradbury@hotmail.com

From: [Riverkeeper](#) on behalf of [George Davison](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 9:19:02 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

George Davison

Catskill, NY 12414
gdavison@hvc.rr.com

From: [Riverkeeper](#) on behalf of [Pamela Brocius](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 9:18:21 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Pamela Brocius
340 E 93rd St
New York, NY 10128-5547
pam@citistaffing.com

From: [Riverkeeper](#) on behalf of [Janet Moser](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 8:18:14 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Janet Moser
596 Campus Pl
North Baldwin, NY 11510-1715
janet630@optonline.net

From: [Riverkeeper](#) on behalf of [Lane Buschel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 6:48:09 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lane Buschel
485 Oscawana Lake Rd
Putnam Valley, NY 10579-2204
lane.buschel@gmail.com

From: [Riverkeeper](#) on behalf of [Maria ValdeMI](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 6:19:06 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Maria Valdemi
81 Sawyers Pass
Hyde Park, NY 12538-2509
mlv.amarcord@gmail.com

From: [Riverkeeper](#) on behalf of [Lawrence D'Arco](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 6:18:05 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lawrence D'Arco
1202 Greenwich Dr
Albany, NY 12203-4464
abelincoln1863@yahoo.com

From: [Riverkeeper](#) on behalf of [Marian Swerdlow](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 5:17:55 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marian Swerdlow
185 E 85th St Apt 14m
New York, NY 10028-2154
mariananswer@aol.com

From: [Riverkeeper](#) on behalf of [Denise Edelson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 4:47:50 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Denise Edelson
17 Marko Grv
Woodstock, NY 12498-1432
rdhedelson@gmail.com

From: [Riverkeeper](#) on behalf of [Nikhil Shimpi](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 2:47:42 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Nikhil Shimpi
139 Emerson Pl
Brooklyn, NY 11205-3839
nikhil_shimpi@hotmail.com

From: [Riverkeeper](#) on behalf of [Alice Weiner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 1:48:29 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alice Weiner
297 W 4th St
New York, NY 10014-2207
alicecarolyn@gmail.com

From: [Riverkeeper](#) on behalf of [Paul Grohman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 1:17:33 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Paul Grohman
59 Cherokee Rd Apt 2f
Yonkers, NY 10710-5161
pmgrohman@gmail.com

From: [Riverkeeper](#) on behalf of [Kevin Kilner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 12:47:29 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kevin Kilner
80 Sparkill Ave
Tappan, NY 10983-2211
kevinkilner21@gmail.com

From: [Riverkeeper](#) on behalf of [Stephen Armstrong](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 12:17:30 PM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Stephen Armstrong
222 Park Pl Apt 3b
Brooklyn, NY 11238-4387
sarmstrong_5@msn.com

From: [Riverkeeper](#) on behalf of [Frances Keegan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 10:53:08 AM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Frances Keegan
6301 Riverdale Ave
Bronx, NY 10471-1093
fran28keegan@yahoo.com

From: [Riverkeeper](#) on behalf of [Marcha Johnson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 9:47:20 AM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marcha Johnson
373 Washington Ave
Brooklyn, NY 11238-1131
marcha.jeff@verizon.net

From: [Riverkeeper](#) on behalf of [Melissa Bishop](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Monday, February 17, 2020 8:52:51 AM

Feb 17, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Melissa Bishop
72 Elm St
Deposit, NY 13754-1344
mmorga10@yahoo.com

From: [Riverkeeper](#) on behalf of [Mikki Chalker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 16, 2020 11:19:12 PM

Feb 16, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mikki Chalker
119 Prospect St
Binghamton, NY 13905-2328
ravynsdaughter@aol.com

From: [Riverkeeper](#) on behalf of [Patty Gibbons](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 16, 2020 4:18:22 PM

Feb 16, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Patty Gibbons
PO Box 1632
Central Islip, NY 11722-0440
info@pattygibbons.com

From: [Riverkeeper](#) on behalf of [carl.tyndall](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 16, 2020 3:47:30 PM

Feb 16, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. Why hasn't a thorough investigation happened yet. A few of its main flaws are:

1. 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.
2. The PSDAR does not even mention the Algonquin Pipeline, a giant high-pressure 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

carl tyndall
504 New Jersey Ave
Brooklyn, NY 11207-4705
ctyn2000@yahoo.com

From: [Riverkeeper](#) on behalf of [Jane Torrence](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 16, 2020 1:17:13 PM

Feb 16, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jane Torrence
21 Pocantico Rd
Ossining, NY 10562-3833
teabuddha@hotmail.com

From: [Riverkeeper](#) on behalf of [Angel Venegas](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 16, 2020 9:29:45 AM

Feb 16, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Angel Venegas
2018-10 15TH DRIVE
BAYSIDE, NY 11360
angel13988@aol.com

From: [Riverkeeper](#) on behalf of [Meghan Samuelson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Sunday, February 16, 2020 7:16:30 AM

Feb 16, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Meghan Samuelson

10536
meghandrummond@gmail.com

From: [Riverkeeper](#) on behalf of [Richard Bonelli](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 11:45:45 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Richard Bonelli
426 Old Route 55
Poughquag, NY 12570-5841
grumblebug2003@yahoo.com

From: [Riverkeeper](#) on behalf of [Moraima Suarez](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 11:16:29 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should REJECT Holtec's PSDAR for Indian Point since a cursory overview shows that the Report FAILS to fulfill its basic objectives. A few of its main flaws are:

1. A full site characterization has not been completed, which immediately casts doubt on the entire report. The site characterization provides the foundational information about the site's current situation, including the extent of any contamination, which is 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I strongly urge you to REJECT this unacceptable PSDAR.

Thank you for your careful consideration,

Sincerely,

Moraima Suarez
215 21st St Apt 1f
Brooklyn, NY 11232-1385
moraima48@earthlink.net

From: [Riverkeeper](#) on behalf of [jK Kibler](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 10:45:38 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

jK Kibler
PO Box
Ghent, NY 12075
fishy2578@yahoo.com

From: [Riverkeeper](#) on behalf of [Michael Wehner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 10:28:19 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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. I live on the Hudson River and worried that it will be impacted by this bad decision.
2. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michael Wehner
PO Box 935
Port Ewen, NY 12466-0935
hudriv@yahoo.com

From: [Riverkeeper](#) on behalf of [K. P-Britt](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 9:28:10 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

K. P-Britt
PO Box 602
Yonkers, NY 10705-0602
sulasky5@gmail.com

From: [Riverkeeper](#) on behalf of [Carole Blodgett](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 8:15:22 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Carole Blodgett
423 Feller Newmark Rd
Red Hook, NY 12571-2340
nurturethechildren@gmail.com

From: [Riverkeeper](#) on behalf of [Lisa Darrigo](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 7:28:00 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lisa Darrigo
13436 58th Rd
Flushing, NY 11355-5235
lisadarrigo28@gmail.com

From: [Riverkeeper](#) on behalf of [John Brinkman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 6:45:59 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

John Brinkman
385 Graham Ave
Brooklyn, NY 11211-2400
john@johnandwendy.com

From: [Riverkeeper](#) on behalf of [Timothy Dunn](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 4:14:54 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Timothy Dunn
24 Dundee Ave
Babylon, NY 11702-2634
timdunn@optonline.net

From: [Riverkeeper](#) on behalf of [Addie Smock](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 3:58:17 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Addie Smock
469 Eastern Pkwy
Brooklyn, NY 11216-4440
addiesmock@yahoo.com

From: [Riverkeeper](#) on behalf of [Gail Burns](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 2:45:33 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Gail Burns
72 Crestwood Blvd
Farmingdale, NY 11735-5801
gailburns33@yahoo.com

From: [Riverkeeper](#) on behalf of [Sylvia Rodriguez](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 2:15:26 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sylvia Rodriguez
227 E 5th St Apt 3fw
New York, NY 10003-8556
sylvia_lion@yahoo.com

From: [Riverkeeper](#) on behalf of [Elisabeth Bauer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 1:27:15 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Elisabeth Bauer
177 White Plains Rd
Tarrytown, NY 10591-5518
libbett524@optonline.net

From: [Riverkeeper](#) on behalf of [Deborah Browne](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 12:14:32 PM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Deborah Browne

NY 10033
shenandoah62@icloud.com

From: [Riverkeeper](#) on behalf of [Monica Gutierrez](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 11:57:06 AM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Monica Gutierrez
200 Elm Rd
Mahopac, NY 10541-1002
monica.gutierrez_@hotmail.com

From: [Riverkeeper](#) on behalf of [S. Nam](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 10:57:45 AM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

S. Nam
165 Bennett Ave
Apt 4l
New York, NY 10040-4080
snam5370@ymail.com

From: [Riverkeeper](#) on behalf of [Angelika Winner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 10:44:20 AM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Angelika Winner
70 Flushing Ave
Brooklyn, NY 11205-1064
angelikawinner@gmail.com

From: [Riverkeeper](#) on behalf of [Michael Hughes](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 9:07:45 AM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michael Hughes
167 Stoll Rd
Saugerties, NY 12477-3023
mfchef54@yahoo.com

From: [Riverkeeper](#) on behalf of [Mary Barrett](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Saturday, February 15, 2020 6:07:28 AM

Feb 15, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mary Barrett
103 Furnace Dock Rd
Croton ON Hudson, NY 10520-1601
maryb145@optonline.net

From: [Riverkeeper](#) on behalf of [Michelle Ashkin](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 11:43:13 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michelle Ashkin
300 Rector Pl
New York, NY 10280-1416
michelleashkin@yahoo.com

From: [Riverkeeper](#) on behalf of [Barbara Merjan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 11:37:28 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Barbara Merjan
3 Tompkins Ave
Ossining, NY 10562-5005
bbsmer@earthlink.net

From: [Riverkeeper](#) on behalf of [Martha Harold](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:43:06 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Martha Harold
16 Rivers Edge Dr Unit 301
Tarrytown, NY 10591-7513
martha.chris.harold@gmail.com

From: [Riverkeeper](#) on behalf of [Abraham Llauger](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:36:35 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Abraham Llauger
200 Broadway
Verplanck, NY 10596-7725
abellauger@outlook.com

From: [Riverkeeper](#) on behalf of [Christopher Blyth](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:07:01 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Christopher Blyth
212 W 136th St
New York, NY 10030-2602
chris.a.blyth@gmail.com

From: [Riverkeeper](#) on behalf of [Laurie Cozza](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:06:30 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Laurie Cozza
205 Wayne Ave
Stony Point, NY 10980-3038
roxannie1@icloud.com

From: [Riverkeeper](#) on behalf of [Claire Davis](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 9:36:32 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Claire Davis
28 Hudson St # 2
Sleepy Hollow, NY 10591-2414
clairedavisnj@yahoo.com

From: [Riverkeeper](#) on behalf of [R. Forest](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 9:06:19 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

R Forest
PO Box 393
New Paltz, NY 12561-0393
robertaforest@gmail.com

From: [Riverkeeper](#) on behalf of [Rhoda Levine](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 8:36:16 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rhoda Levine
20 E 8th St Apt 2a
New York, NY 10003-5918
rhodadir@gmail.com

From: [Riverkeeper](#) on behalf of [Kallyn Krash](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 8:36:15 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kallyn Krash
72 Park Ter W Apt E38
New York, NY 10034-1362
kallynk@juno.com

From: [Riverkeeper](#) on behalf of [Lynne Teplin](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 7:36:13 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lynne Teplin
846 Palmer Rd
Bronxville, NY 10708-3323
lynnet@lagcc.cuny.edu

From: [Riverkeeper](#) on behalf of [Alan Levin](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 7:36:13 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alan Levin
3 Deer Pl
Tomkins Cove, NY 10986-1607
alevin@sacredriverhealing.org

From: [Riverkeeper](#) on behalf of [Vincent Rusch](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Please Reject Holtec's PSDAR
Date: Friday, February 14, 2020 6:42:48 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Vincent Rusch
1090 4th St
Schenectady, NY 12303-2409
vjrusch@acmenet.net

From: [Riverkeeper](#) on behalf of [Erma Lewis](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 5:36:00 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Erma Lewis
1736 63rd St
Brooklyn, NY 11204-2801
elewisny@hotmail.com

From: [Riverkeeper](#) on behalf of [Norman Sissman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 5:35:57 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Since I live within 20 miles of Indian Point please don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Norman Sissman
2308 Kendal Way
Sleepy Hollow, NY 10591-1062
sissmanpr@aol.com

From: [Riverkeeper](#) on behalf of [Rob Eisenson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 5:05:56 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rob Eisenson
103 Gedney St
Nyack, NY 10960-2238
robbywx@aol.com

From: [Riverkeeper](#) on behalf of [Dolores Congdon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 4:36:00 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Dolores Congdon
PO Box 311
Maryknoll, NY 10545-0311
dcongdon@mksisters.org

From: [Riverkeeper](#) on behalf of [Walter Terrell](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 4:06:02 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Walter Terrell
830 Hollywood Ave
Bronx, NY 10465-2306
wdjscarsdale@gmail.com

From: [Riverkeeper](#) on behalf of [Jane Wong](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 4:05:58 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jane Wong
7 Lake Dr
Pleasantville, NY 10570-3307
ibakeitall@optonline.net

From: [Riverkeeper](#) on behalf of [Kristin Sorra](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 4:05:55 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kristin Sorra
52 Main St Fl 2
Tarrytown, NY 10591-3623
kristinsorra@gmail.com

From: [Riverkeeper](#) on behalf of [Robert Jones](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 3:12:22 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Robert Jones
40 W Hyatt Ave
Mount Kisco, NY 10549-2831
jones10549@aol.com

From: [Riverkeeper](#) on behalf of [Edward Mitchell](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 3:06:31 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Edward Mitchell
27 Mount Vernon Ave
Mount Vernon, NY 10550-2417
bronxriverbicycleworks@msn.com

From: [Riverkeeper](#) on behalf of [Mark Wolgamuth](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 3:05:45 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mark Wolgamuth
3 Country Meadows Rd
New Paltz, NY 12561-4003
markrichard58@aol.com

From: [Riverkeeper](#) on behalf of [Richard Wright](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 2:35:43 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Richard Wright
102 Esopus Ave
Ulster Park, NY 12487-5429
scubadiver@hvc.rr.com

From: [Riverkeeper](#) on behalf of [Hilarie Louis](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 2:05:44 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Hilarie Louis
125 Bellair Dr
Dobbs Ferry, NY 10522-3503
hilarie@mail.com

From: [Riverkeeper](#) on behalf of [Christy Pennoyer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 2:05:43 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Christy Pennoyer
19 E 95th St
New York, NY 10128-0710
cpennoyer@wcbullittfound.org

From: [Riverkeeper](#) on behalf of [Joshua Heffron](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 2:05:43 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joshua Heffron
8 E 83rd St # 7b
New York, NY 10028-0418
piratedragon73@aol.com

From: [Riverkeeper](#) on behalf of [Stephen Hopkins](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:42:11 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Stephen Hopkins
6 Peck Ave Apt 62b
Rye, NY 10580-4033
sdhopkins29@aol.com

From: [Riverkeeper](#) on behalf of [Jackie Stolfi](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:35:36 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jackie Stolfi
267 Harbor Ln
Massapequa Park, NY 11762-4012
jacqueline4sight@aol.com

From: [Riverkeeper](#) on behalf of [Jon Fein](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:35:31 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jon Fein
26 Montrose Station Rd
Cortlandt Manor, NY 10567-6002
jon111@aol.com

From: [Riverkeeper](#) on behalf of [Bernard Kessler](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:05:32 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Bernard Kessler
2213 Mohansic Ave
Yorktown Heights, NY 10598-3625
bernie88@optonline.net

From: [Riverkeeper](#) on behalf of [Michael Rieser](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:35:34 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michael Rieser
925 Union St
Brooklyn, NY 11215-1658
mrieser@grownyc.org

From: [Riverkeeper](#) on behalf of [Edward Lakatos](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:05:35 PM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Edward Lakatos

NY 10520
elakatos@msn.com

From: [Riverkeeper](#) on behalf of [Lise Prown](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 11:35:33 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lise Prown
218 Walnut St
Peekskill, NY 10566-3410
liseprown@mac.com

From: [Riverkeeper](#) on behalf of [Deborah Ackerman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 11:35:17 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Deborah Ackerman
71 S Quaker Ln
Hyde Park, NY 12538-2624
debka0917@aol.com

From: [Riverkeeper](#) on behalf of [Roger Muzii](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 11:05:27 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Roger Muzii
3 Webb Rd
Sleepy Hollow, NY 10591-1015
rogermuzii@aol.com

From: [Riverkeeper](#) on behalf of [Jill Padawer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 11:05:26 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely, Jill A. Padawer, PhD
170 Villard Ave.
Hastings on Hudson
NY 10706

Sincerely,

Jill Padawer
170 Villard Ave
Hastings ON Hudson, NY 10706-1217
rosewoodconsult@optonline.net

From: [Riverkeeper](#) on behalf of [Richard Bodane](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 11:05:24 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Richard Bodane
2302 Stuyvesant Dr
Niskayuna, NY 12309-4828
poobah@nycap.rr.com

From: [Riverkeeper](#) on behalf of [Alrun Steinrueck](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR!!
Date: Friday, February 14, 2020 11:05:24 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alrun Steinrueck
1421 Pacific St Apt 3
Brooklyn, NY 11216-5504
alrun@mac.com

From: [Riverkeeper](#) on behalf of [Juanita Dawson-Rhodes](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:41:54 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Juanita Dawson-Rhodes
210 Ridgefield Ave
South Salem, NY 10590-1717
balance210@aol.com

From: [Riverkeeper](#) on behalf of [Jill Berliner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:41:54 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jill Berliner
80 Grove St
Mount Kisco, NY 10549-2908
jillberliner@optonline.net

From: [Riverkeeper](#) on behalf of [kathy haverkamp](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:41:53 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

kathy haverkamp
722 Billsboro Rd
Geneva, NY 14456-9713
khaverka@courts.state.ny.us

From: [Riverkeeper](#) on behalf of [Susan Bernhard](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:35:15 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Susan Bernhard
200 E 24th St Apt 206
New York, NY 10010-3918
suebernhardf@aol.com

From: [Riverkeeper](#) on behalf of [Taffy Williams](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:35:14 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Taffy Williams
191 Westchester Ave
Tuckahoe, NY 10707-2119
tlwilliams@optonline.net

From: [Riverkeeper](#) on behalf of [Dean Cho](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:11:57 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Dean Cho
10217 72nd Ave
Forest Hills, NY 11375-5905
dtcho100@gmail.com

From: [Riverkeeper](#) on behalf of [Rita DeMaria](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:06:02 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rita DeMaria
500 Croton Ave
Cortlandt Manor, NY 10567-6246
demariarita@yahoo.com

From: [Riverkeeper](#) on behalf of [Dominic Melita](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 10:05:08 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Dominic Melita
196 Dupont Ave
Newburgh, NY 12550-4005
sordfish32960@yahoo.com

From: [Riverkeeper](#) on behalf of [Monique Rothman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 9:35:09 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Monique Rothman
219 Tompkins Ave
Hastings ON Hudson, NY 10706-4031
moniquerothman@gmail.com

From: [Riverkeeper](#) on behalf of [Brenda Goldman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 9:35:08 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Brenda Goldman
348 E 87th St
New York, NY 10128-4845
brenda.goldman@verizon.net

From: [Riverkeeper](#) on behalf of [Theresa Baldini](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 9:11:52 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Sincerely,

Theresa Baldini
10 Pinesbridge Road-Box 311
MARYKNOLL, NY 10545
tbaldini@mksisters.org

From: [Riverkeeper](#) on behalf of [Margaret Vernon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 9:11:50 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

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Sincerely,

Margaret Vernon
115 Keller Dr
Fonda, NY 12068-5409
vernon.margaret0@gmail.com

From: [Riverkeeper](#) on behalf of [Chris Schneebeil](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 9:04:58 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Chris Schneebeili
Amazones 6
Geneva, NY 12241
c_schneebeili@bluewin.ch

From: [Riverkeeper](#) on behalf of [Denise LaForgue](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 8:35:41 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Denise LaForgue
2 E Vacation Dr
Wappingers Falls, NY 12590-6577
tjanddee@aol.com

From: [Riverkeeper](#) on behalf of [Leonard lechner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 8:05:20 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Leonard lechner
1444 Dewey Ave
North Bellmore, NY 11710-2131
chrisplace@verizon.nwt

From: [Riverkeeper](#) on behalf of [Chris Rosen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 8:05:11 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Chris Rosen
310 Oscawana Lake Rd
Putnam Valley, NY 10579-2001
chrisr.interport@rcn.com

From: [Riverkeeper](#) on behalf of [Steven Lacker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 7:41:38 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Steven Lacker
30 Yale Ter
Blauvelt, NY 10913-1421
katandsteve@verizon.net

From: [Riverkeeper](#) on behalf of [Sheila Dempsey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 7:35:07 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sheila Dempsey
600 W 239th St
Bronx, NY 10463-1207
sdbrulee@aol.com

From: [Riverkeeper](#) on behalf of [Katie Garton](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 7:35:02 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Katie Garton
430 W 34th St Apt 8c
New York, NY 10001-2332
katieg632@hotmail.com

From: [Riverkeeper](#) on behalf of [Lorna Bosnos](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 6:41:27 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lorna Bosnos
211 W 106th St
New York, NY 10025-3622
loloboz@aol.com

From: [Riverkeeper](#) on behalf of [Sarah Hamilton](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 6:34:45 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Sincerely,

Sarah Hamilton
9087 Tioughanack Rd
Canastota, NY 13032-4224
bigguy287@twcnny.rr.com

From: [Riverkeeper](#) on behalf of [Mindye Fortgang](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 6:04:51 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mindy Fortgang
2154 Holland Way
Merrick, NY 11566-5444
mindeezmuzik@aol.com

From: [Riverkeeper](#) on behalf of [Steven Abel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 6:04:41 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Steven Abel
616 North Broadway
Nyack, NY 10960
sabel@igc.org

From: [Riverkeeper](#) on behalf of [Amy Rosmarin](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 5:34:41 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Amy Rosmarin
322 Mills Rd
North Salem, NY 10560-2309
amyrosmarin@aol.com

From: [Riverkeeper](#) on behalf of [Bonnie Furlong](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 5:34:40 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Bonnie Furlong
4603 Foxwood Dr S
Clifton Park, NY 12065-6822
naturalyyoga@nycap.rr.com

From: [Riverkeeper](#) on behalf of [Matthew Kwiatkowski](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 5:34:38 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Matthew Kwiatkowski
8 Overhill Rd
Cortlandt Manor, NY 10567-1151
matthewkwiatkowski72@yahoo.com

From: [Riverkeeper](#) on behalf of [Mary Mays](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 3:34:23 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mary Mays
140 Carver Loop
Bronx, NY 10475-2946
proudmary2x@aol.com

From: [Riverkeeper](#) on behalf of [Julia Young](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 3:34:22 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Julia Young
18 N Broadway
Tarrytown, NY 10591-3220
judybyoung@aol.com

From: [Riverkeeper](#) on behalf of [Carol Myers](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 2:11:20 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Carol Myers
2313 Alexander Pl
Oceanside, NY 11572-1405
carolmy722@aol.com

From: [Riverkeeper](#) on behalf of [A. Wolf](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:48:44 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

A. Wolf
PO Box 212
Monroe, NY 10949-0212
ajwolf@optonline.net

From: [Riverkeeper](#) on behalf of [Nick Vivian](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:34:32 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Nick Vivian
522 W 152nd St Apt F3
New York, NY 10031-2054
nickvivian@gmail.com

From: [Riverkeeper](#) on behalf of [yvette fernandez](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:04:19 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

yvette fernandez
4509 97th St
Corona, NY 11368-2711
y_fernandez02@yahoo.com

From: [Riverkeeper](#) on behalf of [Edmund Haffmans](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:04:18 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Edmund Haffmans
425 County Route 2
Accord, NY 12404-5245
thinksolar@yahoo.com

From: [Riverkeeper](#) on behalf of [Lazarus Boutis](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:04:13 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lazarus Boutis
PO Box 222
Livingston Manor, NY 12758-0222
lboutis@troutwillow.net

From: [Riverkeeper](#) on behalf of [Kirsten Andersen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:04:11 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kirsten Andersen
709 Warburton Ave
Yonkers, NY 10701-1663
kirstena1@msn.com

From: [Riverkeeper](#) on behalf of [Barry Spielvogel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:04:11 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Barry Spielvogel
435 E 79th St
11-0
New York, NY 10075-1034
band1142@aol.com

From: [Riverkeeper](#) on behalf of [Douglas Cooke](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 1:04:10 AM

Feb 14, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Douglas Cooke
19 Marine Ave Apt C3
Brooklyn, NY 11209-6226
squirreltree@yahoo.com

From: [Riverkeeper](#) on behalf of [Iris Rochkind](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:40:50 AM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Iris Rochkind
4435 Colden St Apt 6b
Flushing, NY 11355-4008
hemabug@aol.com

From: [Riverkeeper](#) on behalf of [John Neumeister](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:40:48 AM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

John Neumeister
508 W 172nd St
New York, NY 10032-2331
jjneumeist@gmail.com

From: [Riverkeeper](#) on behalf of [Moses Fridlich](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:40:48 AM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Moses Fridlich
23 Mount Ridge Ct
Monroe, NY 10950-1161
mofrid@hotmail.com

From: [Riverkeeper](#) on behalf of [Martina Eng](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:17:25 AM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Martina Eng
24 Alta Vista Cir
Irvington, NY 10533-1052
martina0826@verizon.net

From: [Riverkeeper](#) on behalf of [Lauren Vigna](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:05:34 AM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should WHOLEHEARTEDLY reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I COMPEL you to reject this unacceptable PSDAR.

Sincerely,

Lauren Vigna

NY 10605
laurenv1@yahoo.com

From: [Riverkeeper](#) on behalf of [Carolyn Summers](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Friday, February 14, 2020 12:04:50 AM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Carolyn Summers
106 Bradley Rd
Liberty, NY 12754-2635
csummers@springmail.com

From: [Riverkeeper](#) on behalf of [Jerry Wein](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 11:34:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jerry Wein
PO Box 131
Milton, NY 12547-0131
jerry.wein@yahoo.com

From: [Riverkeeper](#) on behalf of [Renee Arnett](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 11:10:36 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Renee Arnett
310 W Nicholai St
Hicksville, NY 11801-3864
indyra@aol.com

From: [Riverkeeper](#) on behalf of [Margaret Othrow](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 11:04:02 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Margaret Othrow
417 Washington Ave
Brooklyn, NY 11238-1804
margeothrow@yahoo.com

From: [Riverkeeper](#) on behalf of [Robert Fetonti](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 11:04:00 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Robert Fetonti
159 Larch Rd
Briarcliff Manor, NY 10510-2331
boblorrie4@optonline.net

From: [Riverkeeper](#) on behalf of [sandra.mattson RN](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 11:04:00 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

sandra mattson RN
129 Royal Gardens Way
Brockport, NY 14420-9516
sandimat@mac.com

From: [Riverkeeper](#) on behalf of [Geri Breen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 11:03:59 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Geri Breen
162 North St
Kingston, NY 12401-3322
msgerib@aol.com

From: [Riverkeeper](#) on behalf of [Amy Benesch](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:40:33 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

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Sincerely,

Amy Benesch
1360 Midland Ave Apt 5b
Bronxville, NY 10708-6824
magrealism@aol.com

From: [Riverkeeper](#) on behalf of [Barbara Thomas](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:34:02 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Barbara Thomas
550 Broome St
New York, NY 10013-1501
barbarathomasnyc@gmail.com

From: [Riverkeeper](#) on behalf of [Lou Priem](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:33:55 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lou Priem
276 Van Yahres Rd
Cooperstown, NY 13326-4148
coopbirc@hughes.net

From: [Riverkeeper](#) on behalf of [Beverly Rice](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:04:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Beverly Rice
3 E 85th St
New York, NY 10028-0417
nycbev85@aol.com

From: [Riverkeeper](#) on behalf of [Beverly Bullock](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:03:53 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Beverly Bullock
400 W 43rd St Apt 27b
New York, NY 10036-6312
bbullock2000@hotmail.com

From: [Riverkeeper](#) on behalf of [Kathy Flaherty](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:03:50 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kathy Flaherty
PO Box 16
East Jewett, NY 12424-0016
kmorph1000@aol.com

From: [Riverkeeper](#) on behalf of [peter e Suter](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:03:50 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

peter e Suter
14448 U T
Kew Gardens Hills, NY 11367
psuter36@aol.com

From: [Riverkeeper](#) on behalf of [Sarah Johnson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 10:03:50 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sarah Johnson
86 N Midland Ave
Nyack, NY 10960-2529
tiarella2@earthlink.net

From: [Riverkeeper](#) on behalf of [Christopher Fetta](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:41:47 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Christopher Fetta
60 Smith St
Hicksville, NY 11801-1934
bassyllama@gmail.com

From: [Riverkeeper](#) on behalf of [Vicki Fox](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:34:23 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Vicki Fox
67 Wodenethe Dr
Beacon, NY 12508-3912
vicki831@earthlink.net

From: [Riverkeeper](#) on behalf of [Jay Gilbert](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:34:22 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jay Gilbert
22 Darwin Ave
Hastings ON Hudson, NY 10706-1812
jaygilbe@optonline.net

From: [Riverkeeper](#) on behalf of [Mary Noll](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:34:22 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mary Noll
94 Grand St Apt 6d
Croton ON Hudson, NY 10520-2563
nollm@optonline.net

From: [Riverkeeper](#) on behalf of [Chris Pan Launois](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:34:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Chris Pan Launois
131 W 85th St
New York, NY 10024-4435
panmail@aol.com

From: [Riverkeeper](#) on behalf of [Judy Miller-Lyons](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:34:19 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Judy Miller-Lyons
14 Rockridge Dr
Highland Mills, NY 10930-6820
earthlady@optonline.net

From: [Riverkeeper](#) on behalf of [Joseph Lawson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:11:23 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joseph Lawson
29 W 65th St Apt 1g
New York, NY 10023-6635
josephglaw@aol.com

From: [Riverkeeper](#) on behalf of [Denise Brown](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:11:22 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Denise Brown
10710 Shore Front Pkwy
Rockaway Park, NY 11694-2637
gnaturecenter@yahoo.com

From: [Riverkeeper](#) on behalf of [Marianne Dietrich](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:11:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marianne Dietrich
2 Canfield Ave Apt 231
White Plains, NY 10601-2048
marianne_dietrich@mac.com

From: [Riverkeeper](#) on behalf of [Ellen Fleishman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:49 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Ellen Fleishman
401 8th Ave Apt 65
Brooklyn, NY 11215-3597
ellengleishman@hotmail.com

From: [Riverkeeper](#) on behalf of [Elena Busani](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:47 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Elena Busani
600 W 239th St
Bronx, NY 10463-1207
eleartemis@yahoo.com

From: [Riverkeeper](#) on behalf of [David Guion](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:47 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

David Guion
264 Dean St
Apt 2
Brooklyn, NY 11217-1806
davidguion@me.com

From: [Riverkeeper](#) on behalf of [Pamela Raup-Kounovsky](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:23 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Pamela Raup-Kounovsky
37 High St
Chatham, NY 12037-1127
pamelot3@earthlink.net

From: [Riverkeeper](#) on behalf of [Eric Arroyo](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:22 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Eric Arroyo
3725 Henry Hudson Pkwy
Bronx, NY 10463-1527
ejarroyo@aol.com

From: [Riverkeeper](#) on behalf of [Elaine Folgar](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:21 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Elaine Folgar
101 Hess Rd
Valley Cottage, NY 10989-2245
elaine4peace@yahoo.com

From: [Riverkeeper](#) on behalf of [Laura Silverman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:20 PM

Feb 13, 2020

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Sincerely,

Laura Silverman

10994-2116

lgsilverman@optonline.net

From: [Riverkeeper](#) on behalf of [Rose Israel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:19 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Rose Israel
9 Pheasant Rd
Pound Ridge, NY 10576-2314
equestlady@aol.com

From: [Riverkeeper](#) on behalf of [Nancy Erts](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 9:04:18 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Nancy Erts
3 Skytop Dr
Croton ON Hudson, NY 10520-1301
nerts@ophope.org

From: [Riverkeeper](#) on behalf of [Wayne Lensu](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:41:17 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Wayne Lensu
53 Davis Ave
Inwood, NY 11096-1213
lensway@sbcglobal.net

From: [Riverkeeper](#) on behalf of [Laurie Gershgorn](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:34:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Sincerely,

Laurie Gershgorn
5 Gilman Ln
Cortlandt Manor, NY 10567-6203
laurie.gershgorn@icloud.com

From: [Riverkeeper](#) on behalf of [Ron Wish](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:34:20 PM

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Sincerely,

Ron Wish
112 Highmount Ave
Nyack, NY 10960-1509
riw6556@verizon.net

From: [Riverkeeper](#) on behalf of [Will S](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:34:18 PM

Feb 13, 2020

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Sincerely,

Will S
35 Tower Hill Rd
Pawling, NY 12564-3419
gaiusmax@hotmail.com

From: [Riverkeeper](#) on behalf of [B. R. Lemonik](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:34:17 PM

Feb 13, 2020

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

B. R. Lemonik
240 Peekskill Road
Mahopac, NY 10541
pipeline@eeyore18.info

From: [Riverkeeper](#) on behalf of [Marthe Schulwolf](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:34:17 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marthe Schulwolf
522 Gair St
Piermont, NY 10968-1081
zabrina2000@verizon.net

From: [Riverkeeper](#) on behalf of [Nathanel Williams Jr.](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:34:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Nathanel Williams Jr.
2190 Madison Ave Apt 3a
New York, NY 10037-2227
nwilliamsjr@aol.com

From: [Riverkeeper](#) on behalf of [richardmdykstra.dykstra](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:11:14 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

richardmdykstra dykstra
monahan rd
port jervis n.y, NY 12771
mdykstra109@gmail.com

From: [Riverkeeper](#) on behalf of [Diana Praus](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:11:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Diana Praus
126 Menands Rd
Menands, NY 12204-1410
vook757@aol.com

From: [Riverkeeper](#) on behalf of [Diane Houslanger](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:11:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Don't put all the risk on the people in this area, for profit. Do the right thing!

Sincerely,

Diane Houslanger

10598-6338

diane108@mail2diane.com

From: [Riverkeeper](#) on behalf of [Gabriele O'Neil](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:21 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Gabriele O'Neil
171 Continental Rd
Napanoch, NY 12458-2600
gaby.oneil@gmail.com

From: [Riverkeeper](#) on behalf of [Elizabeth Shaw](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:17 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

I live near enough to Indian Point Nuclear Plant to be very concerned about the manner and efficiency with which it is decommissioned. Me and my family enjoy the Hudson River and all the glorious countryside in this area. Closing down the plant must be done responsibly or why bother to do it at all.

Therefore, the NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Elizabeth Shaw
5900 Arlington Ave
Bronx, NY 10471-1302
eshaw3@mac.com

From: [Riverkeeper](#) on behalf of [Jeffrey Silman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:15 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jeffrey Silman
1 Sidney Pl
Brooklyn, NY 11201-4442
brewmax@aol.com

From: [Riverkeeper](#) on behalf of [Marcia Stone](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:15 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marcia Stone

NY 10588
marciaston@aol.com

From: [Riverkeeper](#) on behalf of [Mimi Fierle](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:14 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mimi Fierle
5 Hillcrest Rd
South Fallsburg, NY 12779-5625
mfierle423@earthlink.net

From: [Riverkeeper](#) on behalf of [Mercedes Armillas](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mercedes Armillas
659 Saint Marks Ave
Brooklyn, NY 11216-3624
miarmillas@gmail.com

From: [Riverkeeper](#) on behalf of [Katherine Babiak](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:12 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Katherine Babiak
99 Bank St
New York, NY 10014-2109
kmbnyc@aol.com

From: [Riverkeeper](#) on behalf of [Richard Rheder](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Richard Rheder
PO Box 931
Woodstock, NY 12498-0931
rickrheder@gmail.com

From: [Riverkeeper](#) on behalf of [Melissa Guion](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Melissa Guion
264 Dean St # 2
Brooklyn, NY 11217-1806
melissaguion@nyc.rr.com

From: [Riverkeeper](#) on behalf of [Joan Conca](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:10 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joan Conca
45 Grandview Ave
White Plains, NY 10605-2401
joanconca@optonline.net

From: [Riverkeeper](#) on behalf of [Ruth Karpel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 8:04:09 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Ruth Karpel
230 W 55th St
New York, NY 10019-5220
r6k@aol.com

From: [Riverkeeper](#) on behalf of [Gail Sullivan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:41:09 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Gail Sullivan
105 Arden St
New York, NY 10040-1117
gaildiva1@aol.com

From: [Riverkeeper](#) on behalf of [Stana Weisburd, RN](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:41:08 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Stana Weisburd, RN
21 Cooper St
New Paltz, NY 12561-1013
weisburs88@my.sunyulster.edu

From: [Riverkeeper](#) on behalf of [William Mancini](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:14 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

William Mancini
65 Broad St
Kinderhook, NY 12106-1700
sammikit@hotmail.com

From: [Riverkeeper](#) on behalf of [Chris Horton](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:14 PM

Feb 13, 2020

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Chris Horton
2579 8th St
East Meadow, NY 11554-3200
cml999cml@yahoo.com

From: [Riverkeeper](#) on behalf of [Preston Turco](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Preston Turco
360 S 4th St
Brooklyn, NY 11211-6402
simianrobot@yahoo.com

From: [Riverkeeper](#) on behalf of [Margaret Innerhofer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Margaret Innerhofer
PO Box 49
Rhinebeck, NY 12572-0049
margaretinnerhofer@yahoo.com

From: [Riverkeeper](#) on behalf of [Janice Pfeiffer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:12 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Janice Pfeiffer
113 Lake Rd
Sleepy Hollow, NY 10591-1512
japfeiffer@earthlink.net

From: [Riverkeeper](#) on behalf of [Michael Heimbinder](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:12 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Michael Heimbinder
34a Saint Marks Ave
Brooklyn, NY 11217-2404
mheimbinder@gmail.com

From: [Riverkeeper](#) on behalf of [Patrick Brennan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Patrick Brennan
2 Grove Ln
Ardsley, NY 10502-1009
pjbs1@aol.com

From: [Riverkeeper](#) on behalf of [Dawn Gianatiempo](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:34:10 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Dawn Gianatiempo

10567
dmg2009@aol.com

From: [Riverkeeper](#) on behalf of [Rosemary Bay](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:11:08 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Rosemary Bay
324 Hudson View Ter
Hyde Park, NY 12538-3552
x2ndhandrose@yahoo.com

From: [Riverkeeper](#) on behalf of [Timon Malloy](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:04:09 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Timon Malloy
270 W End Ave
New York, NY 10023-2624
tmalloy@fredffrench.com

From: [Riverkeeper](#) on behalf of [Helga Klessen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:04:07 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Helga Klessen
245 Cooper St
Accord, NY 12404-6201
hklessen@yahoo.com

From: [Riverkeeper](#) on behalf of [Gray Smith](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:04:07 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Gray Smith
32 Maiden Ln
Croton ON Hudson, NY 10520-1411
wildriversinc@aol.com

From: [Riverkeeper](#) on behalf of [Lynda Strecker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:04:06 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lynda Strecker
190 Canterbury Dr
Ridge, NY 11961-2009
lyndaeathsong@gmail.com

From: [Riverkeeper](#) on behalf of [Frederick Wishner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:04:05 PM

Feb 13, 2020

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Sincerely,

Frederick Wishner
77 7th Ave Apt 3t
New York, NY 10011-6617
fwishner@gmail.com

From: [Riverkeeper](#) on behalf of [Katherine Bainer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 7:04:04 PM

Feb 13, 2020

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Katherine Bainer
1105 County Route 27
Craryville, NY 12521-5413
kuhnpj@valstar.net

From: [Riverkeeper](#) on behalf of [Maria Pia Marrella](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:41:08 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR. I live 3 miles East of this plant and the threat this company poses not only to my family and neighbors but the entire metropolitan area is incomprehensible.

Sincerely,

Maria Pia Marrella
30 Roberta Dr
Cortlandt Manor, NY 10567-7007
artpsy30@mac.com

From: [Riverkeeper](#) on behalf of [Edward Fitzelle](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:41:08 PM

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Edward Fitzelle
132 Lyncroft Rd
New Rochelle, NY 10804-4134
efitzelle@hotmail.com

From: [Riverkeeper](#) on behalf of [CAROL KESSLER](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:41:07 PM

Feb 13, 2020

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Sincerely,

CAROL KESSLER
15 Gates Ave
Ossining, NY 10562-2807
luisekarolk@gmail.com

From: [Riverkeeper](#) on behalf of [Maria Asteinza](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:41:07 PM

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Sincerely,

Maria Asteinza
7337 Austin St
Forest Hills, NY 11375-6258
asteim@verizon.net

From: [Riverkeeper](#) on behalf of [Mary Cadwallender](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:22 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mary Cadwallender
45 Macdonough St Apt 8
Brooklyn, NY 11216-2365
mcardwallender@gmail.com

From: [Riverkeeper](#) on behalf of [Donna Knipp](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:22 PM

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Donna Knipp
60 Seaman Ave Apt 2e # 2e
New York, NY 10034-2885
knipp.donna@gmail.com

From: [Riverkeeper](#) on behalf of [Julie Takatsch](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Julie Takatsch
67 Schoolhouse Rd
Port Jervis, NY 12771-3544
56jules@optonline.net

From: [Riverkeeper](#) on behalf of [Jennifer Rosenthal](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jennifer Rosenthal
147 Main St
Ossining, NY 10562-4654
firstbse85@aol.com

From: [Riverkeeper](#) on behalf of [Mary Phillips-Burke](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:19 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mary Phillips-Burke
127 Chestnut Hill Rd
Woodstock, NY 12498-2420
roseveere@hvc.rr.com

From: [Riverkeeper](#) on behalf of [Hagit Halperin](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Hagit Halperin
35 E 2nd St
Brooklyn, NY 11218-1019
halperinhagit@hotmail.com

From: [Riverkeeper](#) on behalf of [Bobbie Flowers](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:05 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Bobbie Flowers
418 W 17th St Apt 22a
New York, NY 10011-5826
bobbie_flowers@hotmail.com

From: [Riverkeeper](#) on behalf of [Terri Schneider](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:05 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Terri Schneider
151 Ridge Rd
Valley Cottage, NY 10989-2473
pyloric@optonline.net

From: [Riverkeeper](#) on behalf of [Alice Slater](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:05 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Alice Slater
446 E 86th St
New York, NY 10028-6466
alicejslater@gmail.com

From: [Riverkeeper](#) on behalf of [Marilyn Kaggen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Marilyn Kaggen
1910 Foster Ave
Brooklyn, NY 11230-1902
mkaggen@gmail.com

From: [Riverkeeper](#) on behalf of [Martha Bourne](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Martha Bourne
Maryknoll Sisters
10 Pinesbridge Rd.
Maryknoll, NY 10545
mbourne@mksisters.org

From: [Riverkeeper](#) on behalf of [Meryl Classen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:34:01 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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1. 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.
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3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Meryl Classen
1440 Brooklyn Blvd
Bay Shore, NY 11706-4015
meryl.classen@gmail.com

From: [Riverkeeper](#) on behalf of [Catherine Bagnall](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:11:08 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Catherine Bagnall
21 Pond Dr E
Rhinebeck, NY 12572-1927
cbx@fastmail.com

From: [Riverkeeper](#) on behalf of [Pete Klosterman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:11:06 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Pete Klosterman
372 Central Park W Apt 12a
New York, NY 10025-8209
petek@accesscom.com

From: [Riverkeeper](#) on behalf of [Leslie Bender](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:11:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Leslie Bender
8 Da Vinci Way
New Paltz, NY 12561-2738
benderleslie@gmail.com

From: [Riverkeeper](#) on behalf of [James Finnigan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:21 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

James Finnigan
9 Division St
New Hamburg, NY 12590-5509
jim_finnigan@yahoo.com

From: [Riverkeeper](#) on behalf of [Pamylle Greinke](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:19 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Pamylle Greinke
PO Box 456
Peconic, NY 11958-0456
pamylle1@gmail.com

From: [Riverkeeper](#) on behalf of [Michele Temple](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:19 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michele Temple
4226 69th St
Woodside, NY 11377-3923
mt1142@juno.com

From: [Riverkeeper](#) on behalf of [jennifer.valentine](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:18 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

jennifer valentine
313 1st Ave
Massapequa Park, NY 11762-1850
faboo1028@yahoo.com

From: [Riverkeeper](#) on behalf of [Sharon Pryde](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sharon Pryde
632 E 14th St Apt 9
New York, NY 10009-3377
radio@garynull.com

From: [Riverkeeper](#) on behalf of [Beverly Simone](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:15 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater would most likely lead to it flowing into the Hudson. Totally unacceptable. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Again, totally unacceptable. Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality! You need to reject this unacceptable PSDAR.

Sincerely,

Beverly Simone
222 Van Houten Flds
West Nyack, NY 10994-2524
beverly.simone@verizon.net

From: [Riverkeeper](#) on behalf of [Glen Lawrence](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

Having followed several problems arising from faulty procedures in the decommissioning of other nuclear sites around the country, I urge the NRC to require a detailed description of what exactly will be done in the decommissioning. The description must be thorough in order to prevent Holtec from cutting corners and leaving taxpayers footing the bill to complete the project properly.

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. The PSDAR does not even mention the Algonquin Pipeline, a giant high-pressure 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.
3. Similarly, the activities that are included within the PSDAR are vague to the point of being meaningless. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing

into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Glen Lawrence
302 E 94th St Apt 1c
New York, NY 10128-5622
lawrence@liu.edu

From: [Riverkeeper](#) on behalf of [Bill Purdue](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Bill Purdue
7 Grand Ave
Nyack, NY 10960-1615
billpu1119@yahoo.com

From: [Riverkeeper](#) on behalf of [Susan Torres](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:09 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Susan Torres
26 Hillside Rd
Carmel, NY 10512-6049
dstor26@aol.com

From: [Riverkeeper](#) on behalf of [Gary MacElhiney](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:08 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

This is critically serious so you cannot let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Gary MacElhiney
1050 Albany Post Rd
Gardiner, NY 12525-5501
mmacelhi@hotmail.com

From: [Riverkeeper](#) on behalf of [Amy Lipton](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:06 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Amy Lipton
921 Diven St
Unit 304
Peekskill, NY 10566-2765
amy@ecoartspace.org

From: [Riverkeeper](#) on behalf of [Chris O' Connor](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:06 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Chris O' Connor
64 Grand St
Croton ON Hudson, NY 10520-2519
crotonchris@yahoo.com

From: [Riverkeeper](#) on behalf of [Lois Segel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lois Segel

New York, NY 10003
loissegel@gmail.com

From: [Riverkeeper](#) on behalf of [Michele Dominy](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:02 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michele Dominy
51 W Market St
Red Hook, NY 12571-1534
mdominy@bard.edu

From: [Riverkeeper](#) on behalf of [Liz Piercey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:04:01 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Liz Piercey
2211 Broadway
New York, NY 10024-6263
mingsmomma@gmail.com

From: [Riverkeeper](#) on behalf of [Jacqueline Birnbaum](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:03:59 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jacqueline Birnbaum
311 Bronxville Rd
Bronxville, NY 10708-2111
jacqueline.birnbaum@gmail.com

From: [Riverkeeper](#) on behalf of [Sandra Kissam](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 6:03:58 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR. As a lifetime resident of the lower Hudson region, I resent the reckless attitude of Holtec and the potential for serious problems in the future.

Sincerely,

Sandra Kissam
1261 Union Ave
Newburgh, NY 12550-1640
sandraks@frontiernet.net

From: [Riverkeeper](#) on behalf of [Joan Wilce](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:14 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joan Wilce
54 Fairfield Rd
Yonkers, NY 10705-1707
joanandrenee@verizon.net

From: [Riverkeeper](#) on behalf of [Beth McKeon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:12 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Beth McKeon

12570
bethmckeon@gmail.com

From: [Riverkeeper](#) on behalf of [Kevin Spath](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - PLEASE Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

PLEASE.

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kevin Spath
27 Travis Corners Rd
Garrison, NY 10524-3915
kspath@ymail.com

From: [Riverkeeper](#) on behalf of [F. Robert Wesley](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

F. Robert Wesley
212 Hill Rd
Ithaca, NY 14850-8602
frw2@cornell.edu

From: [Riverkeeper](#) on behalf of [Jerry Rivers](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jerry Rivers
8 Gombert Pl
Roosevelt, NY 11575-1602
jerry.rivers13@yahoo.com

From: [Riverkeeper](#) on behalf of [Elaine Hartel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:01 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Elaine Hartel
1508 Eagle Bay Dr
Ossining, NY 10562-2363
elaine_hartel@msn.com

From: [Riverkeeper](#) on behalf of [Elaine Sloan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:00 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Elaine Sloan
10 Mitchell Pl
New York, NY 10017-1801
elainesloan@nyc.rr.com

From: [Riverkeeper](#) on behalf of [Rosemary Milici](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:41:00 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rosemary Milici
1343 State Route 213
High Falls, NY 12440-5737
roe1227@aol.com

From: [Riverkeeper](#) on behalf of [Melanie Pedicini](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Melanie Pedicini
2751 Birch Ave
East Meadow, NY 11554-4323
mmzm3@yahoo.com

From: [Riverkeeper](#) on behalf of [Joan Farber](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Joan Farber
400 W 23rd St Apt 6l
New York, NY 10011-2176
joanfarber36@gmail.com

From: [Riverkeeper](#) on behalf of [Joyce Pear](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:10 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joyce Pear

NY 10598
pearjoyce@gmail.com

From: [Riverkeeper](#) on behalf of [Pat Fairhurst](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:09 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Pat Fairhurst
56 Appletree Dr
Saugerties, NY 12477-2006
patfairhurst@aol.com

From: [Riverkeeper](#) on behalf of [Hamilton Regen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:08 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Hamilton Regen
44 Remsen St Apt 8
Brooklyn, NY 11201-7117
haasregen@alumni.brown.edu

From: [Riverkeeper](#) on behalf of [Ashley Golubski](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:07 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Ashley Golubski
57 Rachelle Dr
Cheektowaga, NY 14227-3522
agolubski2791@gmail.com

From: [Riverkeeper](#) on behalf of [Lynn Slonaker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:07 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lynn Slonaker
44 Game Farm Rd
Pawling, NY 12564-3429
slonman@aol.com

From: [Riverkeeper](#) on behalf of [Jane Stein](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:06 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Jane Stein
139 W 17th St # 4a
New York, NY 10011-5471
janesteinjd@gmail.com

From: [Riverkeeper](#) on behalf of [Ed VanDolsen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:05 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Ed VanDolsen
29 Highland Rd
Rye, NY 10580-1632
evandolsen@gmail.com

From: [Riverkeeper](#) on behalf of [Filippine Hoogland](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

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Sincerely,

Filippine Hoogland
36 Aspetong Rd
Bedford, NY 10506-1115
filippinedehaan@gmail.com

From: [Riverkeeper](#) on behalf of [Arnold Gore](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Arnold Gore
34 Plaza St E Apt 309
Brooklyn, NY 11238-5037
arnoldgore@aol.com

From: [Riverkeeper](#) on behalf of [Alice Shields](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alice Shields
550 W 45th St
New York, NY 10036-3769
afshields@earthlink.net

From: [Riverkeeper](#) on behalf of [Alice McMeehen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:34:01 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alice McMeehen
PO Box 1182
Warwick, NY 10990-8182
alicem@warwick.net

From: [Riverkeeper](#) on behalf of [Amanda Hudson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:33:58 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Amanda Hudson
47 Herman Dr
Marlboro, NY 12542-5312
ashworks11@yahoo.com

From: [Riverkeeper](#) on behalf of [Marisa Beutel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:33:58 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marisa Beutel
318 Court St
Brooklyn, NY 11231-4336
jedimars@gmail.com

From: [Riverkeeper](#) on behalf of [Michele VanHoesen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:33:57 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michele VanHoesen
46 Vineyard Ave
Highland, NY 12528-1491
michelevh8@yahoo.com

From: [Riverkeeper](#) on behalf of [MargaretAnn Bowers](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:33:57 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

MargaretAnn Bowers
433 N Geneva St
Ithaca, NY 14850-4113
mabowers11@gmail.com

From: [Riverkeeper](#) on behalf of [Rodney Kooney](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:33:56 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

I am a lifelong resident of Westchester County. We should demand a detailed decommissioning plan to safeguard the millions of residents that will be affected by the process or its failure.

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rodney Kooney
204 Half Moon Bay Dr
Croton ON Hudson, NY 10520-3101
rodkooney@aol.com

From: [Riverkeeper](#) on behalf of [Daniel O'Brien](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:33:55 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Daniel O'Brien
36 Mulberry Ln
Milton, NY 12547-5226
dgobthunder@hotmail.com

From: [Riverkeeper](#) on behalf of [Arden Down](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Arden Down
969 Park Ave # 6d
New York, NY 10028-0322
naladown@gmail.com

From: [Riverkeeper](#) on behalf of [Dale Bennett](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:17 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Dale Bennett
28 W 120th St
New York, NY 10027-6345
bennettnyc@aol.com

From: [Riverkeeper](#) on behalf of [Margaret Comaskey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:17 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public. This is not acceptable, and should be rejected.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Margaret Comaskey
1430 Thieriot Ave Apt 4j
Bronx, NY 10460-3804
m.comaskey@verizon.net

From: [Riverkeeper](#) on behalf of [Madalyn Benoit](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Madalyn Benoit
8 Rothermel Lane
Kinderhook, NY 12106
isabella_11372@yahoo.com

From: [Riverkeeper](#) on behalf of [Lisa Pisano](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lisa Pisano
272 Bay 19th St
Brooklyn, NY 11214-6004
lilsprout19@hotmail.com

From: [Riverkeeper](#) on behalf of [Carol Greenstreet](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

For the safety of those of us who live in the New York metropolitan area and in the Hudson Valley, the NRC must reject Holtec's PSDAR for Indian Point. A cursory overview shows that the Report is far from fulfilling its basic objectives. Here are just a few of its primary flaws:

1. A full site characterization has not been completed, which casts serious doubt on the whole report. As you know, the site characterization provides foundational information about the site's current situation, including the extent of any present contamination, which is necessary to determine what needs to be done to decommission the site. How can Holtec accurately gauge the cost of its activities when it does not know what needs to be done? It makes no sense and endangers all of us because this decommission needs to be done well and thoroughly.
2. 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. Are these critical factors within Holtec's awareness? 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. What a nightmare that would be!
3. Similarly, the activities that are included within the PSDAR are so vague that they are basically meaningless. 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 what is extremely critical: possible routes, the timeline for barging, 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 know what Holtec intends, and as such, it is unfathomable that accurate safety considerations and cost estimate were provided for this option. Without these being addressed, how can this option be assessed?
4. Holtec's minimal effort is further highlighted by its method of addressing the known onsite radioactive groundwater contamination, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson, something none of us who care about the river and live near it

want. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and leaving the circulating water intake structures and discharge structure in place as one option. By doing this, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Carol Greenstreet
76 Front St
Millbrook, NY 12545-5948
cgreenstreet1@verizon.net

From: [Riverkeeper](#) on behalf of [Joseph M. Varon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:14 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joseph M. Varon
244 Lindberg St
West Hempstead, NY 11552-2431
jvaron613@aol.com

From: [Riverkeeper](#) on behalf of [Robert Kolodny](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Robert Kolodny
64 W 89th St
New York, NY 10024-2082
rk@kolodnyassoc.com

From: [Riverkeeper](#) on behalf of [Francisco Velez](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Francisco Velez
824 Palmer Rd
Bronxville, NY 10708-3318
javier3273_7@hotmail.com

From: [Riverkeeper](#) on behalf of [George Jackman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

George Jackman
7526 Bell Blvd Apt 3a
Oakland Gardens, NY 11364-3444
gejackman@gmail.com

From: [Riverkeeper](#) on behalf of [Thomas Comiskey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:11:00 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Thomas Comiskey
323 Kemeys Ave
Scarborough, NY 10510-2051
tfcomiskey@gmail.com

From: [Riverkeeper](#) on behalf of [Peter Wood](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:10:57 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Peter Wood
6 Land Mark Dr
Cornwall, NY 12518-2156
nativeofny1@yahoo.com

From: [Riverkeeper](#) on behalf of [Jennie Sunshine](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:10:53 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jennie Sunshine

10598
sunhousetuff@gmail.com

From: [Riverkeeper](#) on behalf of [Allan Goldstein](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:43 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Allan Goldstein
450 Austin Pl
Bronx, NY 10455-5006
dymodad@yahoo.com

From: [Riverkeeper](#) on behalf of [Roberta Clements](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:43 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Roberta Clements
4 Stella Dr
Gardiner, NY 12525-5414
robertaaclements@gmail.com

From: [Riverkeeper](#) on behalf of [Sheila Schraier](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:37 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sheila Schraier
300 Colonel Greene Rd
Yorktown Heights, NY 10598-6023
supersss@aol.com

From: [Riverkeeper](#) on behalf of [Mei Hunkins](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:34 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Mei Hunkins
52 Central Ave
Tappan, NY 10983-1903
hunkins2@gmail.com

From: [Riverkeeper](#) on behalf of [Barbara Joslyn](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:32 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Barbara Joslyn
35 Union Ave
New Windsor, NY 12553-7103
barbara.joslyn@gmail.com

From: [Riverkeeper](#) on behalf of [Claudia Devinney](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:32 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Claudia Devinney
6786 Westview Dr
Perry, NY 14530-9763
tippynine@yahoo.com

From: [Riverkeeper](#) on behalf of [Susan Holland](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:31 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Susan Holland
243 Union Center Rd
Ulster Park, NY 12487-5230
susan-holland@usa.net

From: [Riverkeeper](#) on behalf of [elizabeth.robinson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:31 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

elizabeth robinson

NY 12508
rokn7@hotmail.com

From: [Riverkeeper](#) on behalf of [Karen Greenspan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:30 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Karen Greenspan
114 Liberty St
New York, NY 10006-1006
kegreenspan@hotmail.com

From: [Riverkeeper](#) on behalf of [Craig Stern](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:30 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Craig Stern
30 Pleasant Ridge Rd
Valhalla, NY 10595-1639
greytowers@yahoo.com

From: [Riverkeeper](#) on behalf of [mary mcgeary](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:29 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

mary mcgeary
129 Baltic St
Brooklyn, NY 11201-6065
mbmcgeary@hotmail.com

From: [Riverkeeper](#) on behalf of [Nadia Kirgan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:29 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Nadia Kirgan
533 Spillway Rd
West Hurley, NY 12491-5145
nkirgan@aol.com

From: [Riverkeeper](#) on behalf of [Evy Mayer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:28 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Evy Mayer
3050 Fairfield Ave Apt 3k
Bronx, NY 10463-3300
ukelady123@gmail.com

From: [Riverkeeper](#) on behalf of [Lilli Ross](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:25 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lilli Ross
390 W End Ave Apt 8ds
New York, NY 10024-6107
dancerforpeace@gmail.com

From: [Riverkeeper](#) on behalf of [Art Scott](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:25 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Art Scott
6 Andrea Dr
Poughkeepsie, NY 12603-5102
artscotti@gmail.com

From: [Riverkeeper](#) on behalf of [Greg Williams](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Greg Williams
15 Church St Apt 1
Cold Spring, NY 10516-2851
greg@clearwater.org

From: [Riverkeeper](#) on behalf of [Regina Blakeslee](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:18 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Regina Blakeslee
1004 Cliff Ave
Yorktown Heights, NY 10598-6038
reginablakeslee@optonline.net

From: [Riverkeeper](#) on behalf of [Gerald Hassett](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:15 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Gerald Hassett
4115 44th St
Sunnyside, NY 11104-2263
popeofgv@verizon.net

From: [Riverkeeper](#) on behalf of [James M. Kozlik](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:14 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

James M Kozlik
3530 81st St Apt 5h
Jackson Heights, NY 11372-5021
jamesmkozlik@gmail.com

From: [Riverkeeper](#) on behalf of [Edward Rengers](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Edward Rengers
391 John Joy Rd
Woodstock, NY 12498-2247
edreng@gmail.com

From: [Riverkeeper](#) on behalf of [Paige Harrison](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Paige Harrison
215 W 90th St
New York, NY 10024-1221
namastepj@mac.com

From: [Riverkeeper](#) on behalf of [Victoria Oltarsh](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Victoria Oltarsh
16 Washington St
Nyack, NY 10960-3043
victoriatheaterart@icloud.com

From: [Riverkeeper](#) on behalf of [Sandra Dal Cais](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:11 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sandra Dal Cais
4534 47th St
Woodside, NY 11377-5231
arrachne@yahoo.com

From: [Riverkeeper](#) on behalf of [Javier Rivera](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:07 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Javier Rivera
55 S 3rd St
Brooklyn, NY 11249-5128
javierocker@cs.com

From: [Riverkeeper](#) on behalf of [Lucille Nurkse](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:06 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lucille Nurkse
100 Windsor Pl
Brooklyn, NY 11215-5809
lunur@mac.com

From: [Riverkeeper](#) on behalf of [Alan Stein](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:05 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alan Stein
7335 Utopia Pkwy
Fresh Meadows, NY 11366-1524
asteinpt@yahoo.com

From: [Riverkeeper](#) on behalf of [Susan Riordan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Susan Riordan
35 Ferris Pl
Ossining, NY 10562-3509
smrarch@aol.com

From: [Riverkeeper](#) on behalf of [Richard Stern](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Richard Stern
11 Riverside Dr
New York, NY 10023-2504
rsisyh@yahoo.com

From: [Riverkeeper](#) on behalf of [Joel Leitner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:02 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joel Leitner
609 Trump Park
Shrub Oak, NY 10588-1214
joel@joelleitner.com

From: [Riverkeeper](#) on behalf of [Richard Snow](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:02 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Richard Snow
104 Grand St
Croton ON Hudson, NY 10520-2305
rsnow5@optonline.net

From: [Riverkeeper](#) on behalf of [Jack Polonka](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:04:01 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jack Polonka
1419 Longview Ave
Peekskill, NY 10566-4858
jpolonka@yahoo.com

From: [Riverkeeper](#) on behalf of [Theresa Kastner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:03:59 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications
Staff

Dear: Rulemakings and Adjudications Staff,

The health and future life of all in the area of the Indian Point Reactor deserve the best quality company to be in charge of the decommissioning. It is totally unacceptable to employ this substandard group for whatever reason, especially if it is just to save some money. The important bottom line should be to save lives and save the environment.

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Theresa Kastner
10 Pinesbridge Rd.
Maryknoll, NY 10545-0311
tkastner@juno.com

From: [Riverkeeper](#) on behalf of [elizabeth hegeman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:03:58 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

elizabeth hegeman
445 W 59th St
New York, NY 10019-1104
ehegeman@jjay.cuny.edu

From: [Riverkeeper](#) on behalf of [Loretta Ryan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 5:03:57 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Loretta Ryan
92 Van Cortlandt Park S Apt 4a
Bronx, NY 10463-2925
loretta.ryan@gmail.com

From: [Riverkeeper](#) on behalf of [Ljubica Sefer-Stefancic](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:41:26 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Ljubica Sefer-Stefancic
170 Westminster Dr
Yonkers, NY 10710-4221
ljubica_stefancic@yahoo.com

From: [Riverkeeper](#) on behalf of [Cynthia Soroka-Dunn](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:41:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Cynthia Soroka-Dunn
PO Box 575
Woodstock, NY 12498-0575
darkbird@aol.com

From: [Riverkeeper](#) on behalf of [Joan Agro](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:41:12 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Joan Agro
496 Western Hwy
Blauvelt, NY 10913-2000
jagro@opblauvelt.org

From: [Riverkeeper](#) on behalf of [Celia Ackerman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:41:10 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Celia Ackerman
21102 73rd Ave Apt 2m
Bayside, NY 11364-2818
acelia2000@gmail.com

From: [Riverkeeper](#) on behalf of [M.Gresko](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:41:09 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

M Gresko
87 Long Hill Rd
Highland Mills, NY 10930-6011
oksergm@aol.com

From: [Riverkeeper](#) on behalf of [Wendy Fleischer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:41:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Wendy Fleischer
674 Carroll St Apt 4
Brooklyn, NY 11215-2027
wendy@wendyfleischer.com

From: [Riverkeeper](#) on behalf of [latonya walker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:40:58 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

latonya walker
59 10th st
brooklyn, NY 11236
sassee212@yahoo.com

From: [Riverkeeper](#) on behalf of [Lynn Crevling](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:40:57 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Lynn Crevling
28 Spring Rd
Washingtonville, NY 10992-1830
lcrevling@gmail.com

From: [Riverkeeper](#) on behalf of [Marty Kellerman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:40:56 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marty Kellerman
25 Edwards St
Roslyn Heights, NY 11577-1125
mmkellerman@gmail.com

From: [Riverkeeper](#) on behalf of [Diane Stark](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:40:55 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Diane Stark
74 Derby Ave
Greenlawn, NY 11740-2133
dianecstark@me.com

From: [Riverkeeper](#) on behalf of [Vitalah Simon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:40:53 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Vitalah Simon

10595
vitalah@verizon.net

From: [Riverkeeper](#) on behalf of [Margaret Julie Finch](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:35:03 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Margaret Julie Finch
165 W 26th St
New York, NY 10001-6830
parkerhead@earthlink.net

From: [Riverkeeper](#) on behalf of [Dave Hultgren](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:35:00 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Dave Hultgren
PO Box 71
Blooming Grove, NY 10914-0071
dhultgren@protonmail.com

From: [Riverkeeper](#) on behalf of [Clifford Provost](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:56 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Clifford Provost
140 7th Ave Apt 1b
New York, NY 10011-1816
provost-draper@earthlink.net

From: [Riverkeeper](#) on behalf of [Christine Primomo](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:55 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Christine Primomo
149 Tracey Rd
Ravena, NY 12143-2332
tracyrd@statetel.com

From: [Riverkeeper](#) on behalf of [Alejandra Caldas](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:49 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Alejandra Caldas
261 W 112th St
New York, NY 10026-3550
alejandra-caldas@nyc.rr.com

From: [Riverkeeper](#) on behalf of [John Lippincott](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:47 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

John Lippincott
94 Forshay Rd
Monsey, NY 10952-1015
lipwak@gmail.com

From: [Riverkeeper](#) on behalf of [Victoria Vallye](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:41 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Victoria Vallye
555 Kappock St Apt 1d
Bronx, NY 10463-6425
v555k@msn.com

From: [Riverkeeper](#) on behalf of [Carol Jackson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:37 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Carol Jackson
337 W 71st St Apt 5
New York, NY 10023-3539
cjackson@lanterngroup.org

From: [Riverkeeper](#) on behalf of [Grace Aiello](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:37 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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1. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Grace Aiello
91 Kensington Way
Middletown, NY 10940-2133
charis114@yahoo.com

From: [Riverkeeper](#) on behalf of [Jack David Marcus](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:34 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. I believe that 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.
2. It is clear to me that 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jack David Marcus
215 W 92nd St Apt 15e
New York, NY 10025-7480
jackdavidm@yahoo.com

From: [Riverkeeper](#) on behalf of [Nicholas Prychodko](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:34 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Nicholas Prychodko
PO Box 2138
Bridgehampton, NY 11932-2138
prychdk@yahoo.com

From: [Riverkeeper](#) on behalf of [Rachel Youens](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:34 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rachel Youens
657 E 26th St Apt 6h
Brooklyn, NY 11210-2131
rachelyouens@verizon.net

From: [Riverkeeper](#) on behalf of [Brad Walrod](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:32 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Brad Walrod
5587 State Route 52
Kenoza Lake, NY 12750-5208
brad@kenozatype.com

From: [Riverkeeper](#) on behalf of [Betty Perry](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:31 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this totally unacceptable PSDAR.

Sincerely,

Betty Perry
319 N Broadway
Nyack, NY 10960-1620
wandbperry@msn.com

From: [Riverkeeper](#) on behalf of [Michel Mazza](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:31 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Michel Mazza
76 Glenwood Blvd
Hudson, NY 12534-1426
mm@michelmazza.com

From: [Riverkeeper](#) on behalf of [Sara Brandt](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:30 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sara Brandt
280 Warren St
Brooklyn, NY 11201-6439
vintagesarab@aol.com

From: [Riverkeeper](#) on behalf of [Carol Welsh](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:30 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The more I learn about the decommissioning of Indian Point the greater my concern for the surrounding community, including my friends and family. So many of us were so very happy when we learned Indian Point was going to be shut down, but it appears that this relief is going to be short-lived, if we now have to worry about the safety of the decommissioning. Serious attention and review needs to take place to ensure our communities, the Hudson River and the environment will continue to thrive and not be negatively impacted by the actions of Holtec.

It is important the following steps should take place:

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Carol Welsh
370 River Rd
Briarcliff Manor, NY 10510-2418
cwelsh7@mac.com

From: [Riverkeeper](#) on behalf of [David Baker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:30 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

David Baker
1163 Main St
Malden ON Hudson, NY 12453-7715
dbaker1@hvc.rr.com

From: [Riverkeeper](#) on behalf of [MELANIE MILLER](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:28 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

MELANIE MILLER
453 E 84th St
New York, NY 10028-6233
melmiller8@aol.com

From: [Riverkeeper](#) on behalf of [Jacalyn Dinhofer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:23 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jacalyn Dinhofer
16 W 16th St Apt 6ps
New York, NY 10011-6565
jdinhofer@gmail.com

From: [Riverkeeper](#) on behalf of [Rena Blumenthal](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:22 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

As a resident of the Hudson Valley, I am very concerned that Indian Point be decommissioned in a safe and responsible way. I am writing to ask the NRC to reject Holtec's PSDAR for Indian Point. The Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Rena Blumenthal
32 N Manheim Blvd
New Paltz, NY 12561-1218
renablumenthal@gmail.com

From: [Riverkeeper](#) on behalf of [Kent Thomas](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:22 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Kent Thomas
5 Kathleen Ln
Mount Kisco, NY 10549-3613
kentevanthomas@gmail.com

From: [Riverkeeper](#) on behalf of [Mayelly Moreno](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Mayelly Moreno
2779 Atlantic Ave # 2
Brooklyn, NY 11207-2812
mm172@nyu.edu

From: [Riverkeeper](#) on behalf of [Saveria Garcia-Macri](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:20 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Saveria Garcia-Macri
6 Clinton St
Elmont, NY 11003-1106
reni7@optonline.net

From: [Riverkeeper](#) on behalf of [Melissa Rinzler](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:19 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Melissa Rinzler
68 Sleepy Hollow Rd
Briarcliff Manor, NY 10510-2135
mmr@dommgt.com

From: [Riverkeeper](#) on behalf of [William Sharfman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:19 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

William Sharfman
50 Riverside Dr
New York, NY 10024-6555
sharfman@umich.edu

From: [Riverkeeper](#) on behalf of [Jean Fallon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:18 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Jean Fallon
Maryknoll Sisters
Maryknoll, NY 10545
jfallon@mksisters.org

From: [Riverkeeper](#) on behalf of [Susan Galloway](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:18 PM

Feb 13, 2020

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Sincerely,

Susan Galloway
122 Judson Ave
Dobbs Ferry, NY 10522-3028
suegalloway@gmail.com

From: [Riverkeeper](#) on behalf of [Robert Schulof](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Robert Schulof
140 Cadman Plz W Apt 9g
Brooklyn, NY 11201-1876
schu24@aol.com

From: [Riverkeeper](#) on behalf of [James Doherty](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:16 PM

Feb 13, 2020

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Sincerely,

James Doherty
321 Lakeview St
Mahopac, NY 10541-3334
jjdoherty@yahoo.com

From: [Riverkeeper](#) on behalf of [steven goldman](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:16 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
4. Holtec's minimal effort is further highlighted by its method of choice to address the known radioactive groundwater contamination on-site, monitored natural attenuation -- essentially doing nothing. Doing nothing about radioactive groundwater could lead to it flowing into the Hudson. To cut costs, Holtec also only proposes removing above ground structures to a depth of 3 feet and proposes abandoning the circulating water intake structures and discharge structure in place as one option. Simply leaving all the radioactive contamination and structures in place, Holtec is not proposing to fully restore the site for future uses.

5. Finally, the PSDAR cannot be clearer in showing Holtec's true intentions of draining the decommissioning trust fund. Though Indian Point Units 2 and 3 are functionally similar other than the size of their decommissioning fund, the PSDAR projects that decommissioning Unit 3 will cost almost \$200 million more. The PSDAR also notes that Holtec anticipates that it will get exemptions to use the decommissioning fund for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from its intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. In conjunction to draining the funds, Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

steven goldman
215 E 64th St
New York, NY 10065-6662
semelg@aol.com

From: [Riverkeeper](#) on behalf of [Allen M. Abrahams](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:15 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Allen M. Abrahams
308 Adams St
Ithaca, NY 14850-3566
teknikal@twcnny.rr.com

From: [Riverkeeper](#) on behalf of [Carol Warren](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:14 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Carol Warren
264 Dewitt Mills Rd
Hurley, NY 12443-6214
warrenc52@yahoo.com

From: [Riverkeeper](#) on behalf of [Nancy Haffner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:14 PM

Feb 13, 2020

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Sincerely,

Nancy Haffner
83 Lefurgy Ave
Dobbs Ferry, NY 10522-1205
nhaff66@gmail.com

From: [Riverkeeper](#) on behalf of [Nora Gaines](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:13 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Nora Gaines
PO Box 811
New York, NY 10024-0545
ngaines@bankstreet.edu

From: [Riverkeeper](#) on behalf of [Marcy Gordon](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:12 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marcy Gordon
1758 Dean St
Brooklyn, NY 11233-3502
mgordon@pipeline.com

From: [Riverkeeper](#) on behalf of [Jordan Glass](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:12 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Jordan Glass
8 Topland Rd
Hartsdale, NY 10530-3009
jglass1@gmail.com

From: [Riverkeeper](#) on behalf of [Michael Stocker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:10 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

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Sincerely,

Michael Stocker
100 Riverside Dr
New York, NY 10024-4822
mastrocke@syr.edu

From: [Riverkeeper](#) on behalf of [Ulrike Klopfer](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:10 PM

Feb 13, 2020

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Sincerely,

Ulrike Klopfer
74 W 68th St Apt 3a
New York, NY 10023-6049
ulrieklopfer@hotmail.com

From: [Riverkeeper](#) on behalf of [John Keiser](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:09 PM

Feb 13, 2020

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

John Keiser
410 E 6th St Apt 17b
New York, NY 10009-6418
jlck@nyc.rr.com

From: [Riverkeeper](#) on behalf of [Courtney Williams](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:08 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
3. 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.
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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Courtney Williams
92 McGuire Ave
Peekskill, NY 10566-5718
mazafratz@yahoo.com

From: [Riverkeeper](#) on behalf of [Beth McCormick](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:05 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Beth McCormick
Springvale Apts., 18 Spring Place Apt. L
Croton-on-Hudson, NY 10520-1360
bmccormickop@gmail.com

From: [Riverkeeper](#) on behalf of [Ryan Sankar](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:04 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Ryan Sankar
8810 178th St Apt 3f
Jamaica, NY 11432-4612
ryan.sankar@ms.com

From: [Riverkeeper](#) on behalf of [Gabrielle Kayser](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:34:00 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Gabrielle Kayser
2 Pine St
Hicksville, NY 11801-3212
gkayser@hotmail.com

From: [Riverkeeper](#) on behalf of [Marc Ward](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:59 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

1. 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.
2. 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.
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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Marc Ward
336 Central Park W Apt 1e
New York, NY 10025-7108
littorguy@aol.com

From: [Riverkeeper](#) on behalf of [Jane Young](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:57 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

The NRC should reject Holtec's PSDAR for Indian Point since a cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Jane Young
85 High Falls Road Ext
Catskill, NY 12414-5607
catskillian2@mac.com

From: [Riverkeeper](#) on behalf of [cave man](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:56 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

cave man
609 Helmcken
New York, NY 12555
mrrails@yahoo.ca

From: [Riverkeeper](#) on behalf of [Amy deCamp](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:55 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Amy deCamp
43A spring valley st
beacon, NY 12508
decamp.ar@gmail.com

From: [Riverkeeper](#) on behalf of [Sandra Dal Cais](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:54 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Sandra Dal Cais
4534 47th St
Woodside, NY 11377-5231
plutonique@aol.com

From: [Riverkeeper](#) on behalf of [Beth Darlington](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:54 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Therefore, as outlined in the PSDAR, Holtec has everything to gain and nothing to lose, by shifting all risk onto the public.

Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.

Sincerely,

Beth Darlington
124 Raymond Ave # 323
Poughkeepsie, NY 12604-0001
bedarlington@vassar.edu

From: [Riverkeeper](#) on behalf of [Anna Kruczek](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:54 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Anna Kruczek
12TH ST
carle place, NY 11514
annakruczek@gmail.com

From: [Riverkeeper](#) on behalf of [Martha D. Perlmutter](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:53 PM

Feb 13, 2020

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Sincerely,

Martha D. Perlmutter
119 Bellows Ln
New City, NY 10956-2440
mdp225@yahoo.com

From: [Riverkeeper](#) on behalf of [Kristina Younger](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:53 PM

Feb 13, 2020

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Sincerely,

Kristina Younger
480 Pond View Rd
Petersburg, NY 12138-5727
key12061@gmail.com

From: [Riverkeeper](#) on behalf of [Kate Sherwood](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:51 PM

Feb 13, 2020

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Sincerely,

Kate Sherwood
96 Barnes St
Long Beach, NY 11561-2615
kt3632003@yahoo.com

From: [Riverkeeper](#) on behalf of [Michael Owen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:51 PM

Feb 13, 2020

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Sincerely,

Michael Owen
868 E 7th St Apt 6k
Brooklyn, NY 11230-2266
michaeldowen@gmail.com

From: [Riverkeeper](#) on behalf of [Michael Seckendorf](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:50 PM

Feb 13, 2020

U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff

Dear: Rulemakings and Adjudications Staff,

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Sincerely,

Michael Seckendorf
16 Towners Rd
Carmel, NY 10512-6002
mikeseck@aol.com

From: [Riverkeeper](#) on behalf of [Helen Vose](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:49 PM

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Sincerely,

Helen Vose
79 E Forest Trl
Holmes, NY 12531-5146
hlvose@aol.com

From: [Riverkeeper](#) on behalf of [Abigail Jones](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 4:33:49 PM

Feb 13, 2020

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Sincerely,

Abigail Jones

18360

abigail.jones@hotmail.com

From: [Riverkeeper](#) on behalf of [William Sinderbrand](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 - Reject Holtec's PSDAR
Date: Thursday, February 13, 2020 2:05:12 PM

Feb 13, 2020

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Sincerely,

William Sinderbrand
37 Nagle Ave
Apt 6f
New York, NY 10040-1484
wsinder@gmail.com