

From: Kevin Kamps <kevin@beyondnuclear.org>
Sent: Thursday, September 3, 2020 1:02 PM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Re-send -- Fwd: Beyond Nuclear's 18th set of public comments, re: Docket ID NRC-2018-0052, re: NRC's Holtec/ELEA CISF DEIS

Dear NRC Staff,

As I have communicated to NRC staffers Jill Caverly, Chip Cameron, Jose Cuadrado-Caraballo, and Stacey Imboden, when I emailed the comments below yesterday evening, to this address <holtec-cisfeis@nrc.gov>, I got an error message back. Thus, now that Jill Caverly just informed me that <holtec-cisfeis@nrc.gov> is working again, I am re-sending my comments below, to make sure they are included in the official record. As with all of my comments, I request that you explicitly acknowledge receiving them, specifically, and confirming they specifically have been added to the official record. Thank you.

---Kevin Kamps, Beyond Nuclear & Don't Waste Michigan

----- Forwarded message -----

From: Kevin Kamps <kevin@beyondnuclear.org>
Date: Wed, Sep 2, 2020 at 6:37 PM
Subject: Beyond Nuclear's 18th set of public comments, re: Docket ID NRC-2018-0052, re: NRC's Holtec/ELEA CISF DEIS
To: <holtec-cisfeis@nrc.gov>

Beyond Nuclear's 18th set of public comments, re: Docket ID NRC-2018-0052, re: NRC's Holtec/ELEA CISF DEIS

Dear NRC Staff,

This is my 18th set of public comments in this proceeding (my 1st to 10th sets were my written comments, submitted via <holtec-cisfeis@nrc.gov>; my 11th set were my verbal comments on the 6/23/20 call-in session; my 12th set were my verbal comments on the 7/9/20 call-in; my 13th set were my verbal comments on the 8/20/20 call-in; my 14th set were my verbal comments on the 8/25/20 call-in; my 15th and 16th sets were my verbal comments on the 8/26/20 call-in; my 17th set were my verbal comments on today's 9/2/20 call-in -- I promised to complement those verbal comments with this written submission of back-up documentation).

I submit these comments on behalf of our members and supporters, not only in New Mexico, near the targeted Holtec/ELEA Laguna Gatuna site, but across New Mexico, and the rest of the country, along road, rail, and waterway routes that would be used for high risk, highly radioactive waste shipments to Holtec's CISF, as well as to Yucca Mountain, Nevada, on

Western Shoshone land -- bogusly assumed by Holtec, as well as NRC, to someday become a permanent disposal repository.

During a public comment webinar/call-in session re: the NRC's Holtec CISF DEIS on August 26, 2020, Nick Maxwell, of We the Fourth in Hobbs, NM, a Holtec CISF opponent and ELEA watch-dog, raised an allegation of bribery/kickbacks associated with the scheme.

Before allowing Nick Maxwell a second opportunity to submit verbal public comments towards the very end of the hours-long session, NRC meeting facilitator Chip Cameron warned Maxwell that he, and apparently the rest of the assembled NRC staff, as well, did not want to hear any more about bribery/kickback allegations.

As a federal government official, Chip Cameron had no right to censor Nick Maxwell's free speech. This not only violated Nick Maxwell's First Amendment free speech rights, it also violated Nick Maxwell's rights under the National Environmental Policy Act to submit any public comments re: the Holtec/ELEA CISF scheme that he chooses to make.

After all, Nick Maxwell's allegations of bribery/kickbacks are bolstered by all of the documentation that follows below.

And of course it goes without saying that NRC's flippant lack of concern about Holtec's, and allegedly also ELEA's, penchant for engaging in bribery/kickbacks, is shocking and outrageous. After all, how can NRC fulfill its mandate, to protect public health, safety, and the environment, and to protect the common defense, when it looks the other way, as its own licensees engage in such serious criminal wrongdoing as bribery/kickbacks, not to mention providing false information (that is, lying) under oath? How can a company that behaves this way be entrusted with the storage and transportation of forever deadly, highly radioactive, commercial irradiated nuclear fuel, and Greater-Than-Class-C "low" level radioactive waste? How does Holtec's involvement in a well documented bribery conviction in the past, and Holtec's later lying about it under oath while seeking a \$260 million tax break from the State of New Jersey, not run afoul of NRC's rules and regulations re: corporate character and integrity requirements, as well as those for licensee executive offices -- such as Holtec CEO, Krishna Singh?

Incredibly, despite Beyond Nuclear's and Mining Awareness's raising these and very similarly issues, of Holtec's penchant for engaging in bribery, in their July 2018 public comments, during NRC's environmental scoping phase re: this CISF, and despite the extensive media coverage from 2019 to 2020 listed below, the words "bribe" and "bribery" do not even appear in the 488-page NRC Holtec CISF DEIS, published in March 2020. Yet again, the agency is behaving as if the bribery conviction in which Holtec was involved, and additional allegations of Holtec attempting bribery, simply never took place. But they did take place. NRC's ignoring all this violates the agency's own requirements re: corporate character and integrity, as well as the agency's own requirements re: the character and integrity of licensee executive offices, such as Holtec CEO, Krishna Singh.

As posted December 20, 2018 on Beyond Nuclear's website:

"The NRC staff determined that NRC regulations do not specifically address bribery."

The U.S. Nuclear Regulatory Commission (NRC) delivered an early Xmas present to Holtec International on 12/20/18. NRC announced that day its decision, that "NRC regulations do not specifically address bribery." The shocking statement is included in [a December 20, 2018 "Closure Letter," re: an "Allegation" of bribery against Holtec](#), that NRC launched an official investigation into, which lasted nearly five months. In the end, NRC's curt "Closure Letter" announced that bribery is not its department!

Are concerned citizens and watch-dog groups like ours supposed to somehow activate the U.S. Department of Justice to investigate these bribery allegations, since NRC has flippantly washed its hands of the matter? NRC has done this despite Holtec's documented involvement in a bribery scheme that led to a conviction. NRC is behaving like that bribery conviction never took place.

On July 30, 2018, in its public comments re: NRC's National Environmental Policy Act scoping process vis-a-vis Holtec's proposal to "temporarily store" all the highly radioactive waste to ever be generated in the United States (and then some) in southeastern New Mexico, Beyond Nuclear included allegations of bribery by Holtec. [See page 2 of Beyond Nuclear's comments, at this link here, re: the bribery allegations against Holtec CEO Krishna Singh,](#)

and reproduced immediately below, within brackets:

[I would like to add a couple more updates to what I've submitted in the past below. During the course of working with Oscar Shirani on these concerns over the course of about five years, beginning in January 2003, until his untimely death, he told me that the CEO of Holtec, Dr. Kris Singh, had attempted to bribe him into silence. Oscar Shirani told me that Dr. Singh offered to hire Shirani into Holtec, telling him he could name his own salary. The implicit offer included the caveat that Shirani would have to shut up about his QA concerns re: Holtec containers. Shirani rejected the bribe, and continued to raise his concerns about Holtec container QA violations, at every opportunity, for the rest of his too short life.

When I asked a question at the Holtec and ELEA press conference on Capitol Hill in April 2017 (at which they announced their license application to build and operate the CISF in NM), re: Shirani's QA violation allegations against the Holtec containers, Dr. Singh did not address the technical merits of the allegations. Instead, he launched into an ad hominem attack on Shirani's character, a man who had

passed on many years before. Dr. Singh attempted to turn reality on its head, by accusing Shirani of extorting him for a job at Holtec. Actually, what Shirani told me was, it was the other way around, that Dr. Singh had offered him a bribe, in the form of a well paid job at Holtec, in return for his silence. I found Dr. Singh's ad hominem attack on Shirani, a man of extraordinary integrity, very telling.

Allegations of bribery are quite serious, especially in an industry as safety, security, environmentally, and public health--significant as high--level radioactive waste transport and storage. But on July 30, 2018, Mining Awareness posted a blog entitled *The Holtec Browns Ferry Bribery Case Revisited: Despite An OIG Criminal Investigation Leading To Suspension--Debarment, Holtec Has Continued To Sell Its Nuclear Waste Cans And Services To Browns Ferry--TVA*

The blog is posted online at:

<https://miningawareness.wordpress.com/2018/07/29/holtec-nuclear-waste-cans-kris-singh-apparent-bribery-and-allegation-of-bribery/>

So Shirani's is not the only accusation of bribery involving Holtec International. NRC should take this quite seriously, and investigate the accusations thoroughly. Allegations of criminality, and the management of high--level radioactive waste, should never be mentioned in the same sentence!

NRC should also take seriously the allegations of QA violations involving Holtec casks, 18 years since Shirani, and Landsman, first brought them to light.]

Specifically, Holtec's CEO, Krishna Singh, attempted to bribe industry whistle-blower Oscar Shirani of Commonwealth Edison/Exelon (as well as NRC Region 3 dry cask storage inspector, and whistle-blower, Dr. Ross Landsman), into silence, re: widespread, serious quality assurance (QA) violations in the design and fabrication of Holtec containers for high-level radioactive waste storage and transport, used extensively throughout the U.S. nuclear power industry.

Singh was also implicated in bribing a Tennessee Valley Authority (TVA) official in order to secure a contract at the Browns Ferry nuclear power plant in Alabama. The bribery led to a court conviction, and resulted in Holtec paying millions of dollars in fines, as well as a 60-day suspension (a disbarment) on doing business with TVA.

Of course, \$2 million in fines, and a 60-day disbarment, were mere slaps on the wrist for a giant international corporation like Holtec. Holtec was then simply allowed to proceed merrily along its way, executing, and profiting from, the contract it secured through bribery, and others that followed thereafter.

What follows is a long listing of some two-dozen news articles, and other documentation, re: Holtec's and its CEO, Krishna Singh's, penchant for bribery.

[Mining Awareness, on July 29, 2018, published an exposé and provided documentation of Holtec's TVA bribery and kick-back scandal.](#)

<<https://miningawareness.wordpress.com/2018/07/29/holtec-nuclear-waste-cans-kris-singh-apparent-bribery-and-allegation-of-bribery/>>

As posted on Beyond Nuclear's website, from July 29, 2018 to July 6, 2020:

Posted July 29, 2018 --

Holtec Nuclear Waste Cans-Kris Singh: Apparent Bribery-Kickback And Allegation Of Attempted Bribery

[As published by Mining Awareness.](#)

<<https://miningawareness.wordpress.com/2018/07/29/holtec-nuclear-waste-cans-kris-singh-apparent-bribery-and-allegation-of-bribery/>>

Update on September 14, 2018

Posted September 14, 2018 --

CEO of N.J. firm given \$260M in tax breaks trashes local workers as lazy, drug users

[As reported by NJ.com.](#)

<https://www.nj.com/camden/2018/09/ceo_of_nj_firm_given_260m_in_tax_breaks_trashes_local_workers_as_lazy_drug-users.html>

Update on May 23, 2019 --

Re: Holtec -- "A False Answer, a Big Political Connection and \$260 Million in Tax Breaks"

As reported by *ProPublica* and WNYC.

<<https://www.propublica.org/article/holtec-international-george-norcross-tax-breaks>>

Update on June 3, 2019 --

Posted June 3, 2019 --

Sources: Subpoena issued to New Jersey Economic Development Authority seeks documents on Holtec

As reported by *Politico*.

<https://www.politico.com/states/new-jersey/story/2019/06/03/sources-subpoena-issued-to-eda-seeks-documents-on-holtec-conner-strong-cooper-health-1038297?fbclid=IwAR2EGpa-xfgrPGg879p9SZfWijG9id_Ma1uNfd5kT_-dSawszZgU5_oY>

The news follows [an earlier exposé by Politico and WNYC, dated May 23, 2019](#), re: Holtec's false testimony to the State of New Jersey on an application which won the company a \$260 million tax break. Holtec testified that it had never been barred from doing business with the federal government or any state government. This was false. It had been barred from doing business with the Tennessee Valley Authority, due to a bribery conviction at the Browns Ferry Nuclear Power Plant in Alabama.

Update on June 4, 2019 --

Posted June 4, 2019:

The Tax Break Application Had a False Answer. Now the State Has Put the Break on Hold.

After WNYC and ProPublica identified a false answer on nuclear company Holtec International's New Jersey tax break application, state officials have frozen the break pending further investigation.

As further reported by WNYC and ProPublica.

[<https://www.propublica.org/article/holtec-international-tax-break-application-false-answer-new-jersey-on-hold>](https://www.propublica.org/article/holtec-international-tax-break-application-false-answer-new-jersey-on-hold)

Update on June 26, 2019 --

June 26, 2019 --

A Huge Tax Break Went to a Politically Connected Company in New Jersey Despite Red Flags

Holtec International told New Jersey regulators that Ohio was competing for its new headquarters. But officials there stripped the firm of past tax awards for failing to create the jobs it promised.

As reported by ProPublica and WNYC.

[<https://www.propublica.org/article/a-huge-tax-break-went-to-a-politically-connected-company-in-new-jersey-despite-red-flags>](https://www.propublica.org/article/a-huge-tax-break-went-to-a-politically-connected-company-in-new-jersey-despite-red-flags)

Update on June 30, 2019 --

Posted June 30, 2019 --

Jim Walden went after the mob as a federal prosecutor. Now he's investigating N.J. tax breaks

As reported by the Philadelphia Inquirer.

[<https://www.inquirer.com/business/camden-tax-breaks-new-jersey-norcross-murphy-walden-20190630.html>](https://www.inquirer.com/business/camden-tax-breaks-new-jersey-norcross-murphy-walden-20190630.html)

Update on July 2, 2019 --

Posted July 2, 2019 --

Meet the Congressman Defending Questionable Tax Breaks for a Company Connected to His Rich Brother

After multiple issues have surfaced with Holtec International's New Jersey tax break application, Rep. Donald Norcross, its biggest congressional supporter (and the brother of a Holtec board member) is playing defense.

[As reported by ProPublica and WNYC.](#)

<https://www.propublica.org/article/meet-the-congressman-defending-questionable-tax-breaks-for-a-company-connected-to-his-rich-brother>

Update on July 9, 2019 --

[Posted July 9, 2019 --](#)

[Holtec funneled \\$50,000 to federal employee in bid to win contract, inspector general report says](#)

[As reported by the Philadelphia Inquirer.](#)

<https://www.inquirer.com/business/holtec-tennessee-valley-authority-nj-tax-credit-investigation-20190709.html>

[Posted July 9, 2019 --](#)

[Holtec CEO was at center of inquiry that led to disbarment by federal agency](#)

[As reported by Politico.](#)

<https://www.politico.com/states/new-jersey/story/2019/07/09/holtec-ceo-was-at-center-of-inquiry-that-led-to-disbarment-by-federal-agency-1091777>

Update on July 10, 2019 --

[\[NJ State Senate Majority Leader\] Weinberg 'troubled' by Holtec revelations](#)

[As reported by Politico.](#)

<https://www.politico.com/states/new-jersey/story/2019/07/10/weinberg-troubled-by-holtec-revelations-1093086>

Update on July 16, 2019 --

[Pilgrim Watch Motion to File a New Contention, re: Holtec trustworthiness, reliability, and character \(vis-a-vis allegation of bribery attempts, and more\)](#)

See the [July 16, 2019 Motion filed by environmental watch-dog organization Pilgrim Watch](#), in the context of Holtec International/SNC-Lavalin's takeover of the permanently shutdown Pilgrim atomic reactor license for decommissioning and irradiated nuclear fuel management purposes.

<<http://static1.1.sqspcdn.com/static/f/356082/28163521/1564159157527/Motion+to+File+New+Contention+07.16.19+.pdf?token=pHHF6c9a%2BDEvOLWOMOw59pbgZ7s%3D>>

Update on July 25, 2019 --

[SNC-Lavalin's radioactive and other skeletons in the closet \(Holtec International and SNC-Lavalin have formed a consortium to undertake nuclear power plant decommissioning, as well as high-level radioactive waste management, named Comprehensive Decommissioning International, CDI\):](#)

See a [long list re: SNC-Lavalin's skeletons in the closet, posted at Beyond Nuclear's DECOMMISSIONING website section](#).

SNC-Lavalin has been implicated, and its officials convicted and imprisoned, for massive bribery schemes, internationally. This has led to it, and its subsidiaries, being banned and barred from doing business with the World Bank, and other official institutions.

<<http://www.beyonduclear.org/decommissioning/2019/7/26/radioactive-and-other-skeletons-in-snc-lavalins-closet.html>>

Update on November 18, 2019 by [admin](#)

[Cops drag out activist as \[Holtec International board of directors member\] George Norcross testifies at N.J. Senate hearing on tax incentives](#)

As reported by the [Philadelphia Inquirer](#).

<<https://www.inquirer.com/news/george-norcross-critic-removed-police-tax-incentive-hearing-20191118.html>>

George Norcross is a Holtec International board of directors member.

Holtec itself was one of several Norcross affiliated companies that benefited from these controversial tax breaks, to the tune of \$1.1 billion altogether.

Holtec alone got \$260 million, despite its CEO, Krishna Singh, providing false information on its application paperwork.

Norcross's brother, an attorney, was instrumental in the passage of the tax break law in the first place.

Another Norcross brother is a U.S. Representative.

Further complicating matters in New Jersey, Holtec has secured a takeover of Oyster Creek nuclear power plant, for decommissioning and high-level radioactive waste management.

The high-level radioactive waste at Oyster Creek could be shipped to New Mexico for "interim storage" at a "consolidated facility," if Holtec gets its way.

Update on November 23, 2019 --

[Nuke Farm, New Mexico \(Part One\), by Nick Maxwell at We the Fourth](#)

[Excellent summary of the Holtec International/Eddy-Lea Energy Alliance consolidated interim storage facility fight, by Nick Maxwell, as posted at We the Fourth.](#)

<<https://wethefourth.org/>>

{Scroll down to this document, posted at the date Nov. 23, 2019.}

Update on January 15, 2020 --

[Is The Company Poised To Dismantle Indian Point Too Radioactive?](#)

[As reported by WNYC.](#)

<<https://gothamist.com/news/company-poised-dismantle-indian-point-radioactive>>

For additional background information about [Holtec International](#) and [SNC-Lavalin](#), see Beyond Nuclear's respective "skeletons in the closet" annotated bibliographies, provided at the hot links:

<<http://www.beyondnuclear.org/centralized-storage/2019/7/25/radioactive-skeletons-in-holtec-internationals-closet.html>>

<<http://www.beyondnuclear.org/decommissioning/2019/7/26/radioactive-and-other-skeletons-in-snc-lavalins-closet.html>>

Holtec has applied to the U.S. Nuclear Regulatory Commission for a license to construct and operate a consolidated interim storage facility for 173,600 metric tons of irradiated nuclear fuel in southeastern New Mexico. This would involve thousands of road, rail, and/or waterway shipments of high risk, high-level radioactive waste, through most states, over the course of decades.

Update on January 16, 2020 --

See also:

- **USA Today Network** - [Holtec faces tough questions about Indian Point teardown at first public meeting in Buchanan](#) - Thomas C. Zambito, Rockland/Westchester Journal <<https://www.lohud.com/story/news/local/westchester/buchanan/2020/01/16/indian-point-nuclear-plant-buchanan-decommissioning-teardown-funding/4484861002/>>
- **TheExaminerNews.com**, [Officials, Residents Grill Company Chosen to Decommission Indian Pt.](#) - Rick Pezzullo
- <<https://www.theexaminernews.com/officials-residents-grill-company-chosen-to-decommission-indian-pt/>>

Update on April 27, 2020 --

[The Holtec Partnership, Probed](#)

Statement from Lea County, NM resident, and We the Fourth spokesman, Nick Maxwell:

Greetings from Lea County,

Blessings continue daily. I have new information regarding the investigation into the Holtec-ELEA partnership in New Mexico. On Friday, the State Auditor officially confirmed an open investigation of my procurement complaint filed on July 17, 2019.

Below, please find my recently published commentary of the government misconduct being investigated.

I'd encourage you to share this information in any way to build public awareness. On social media, please share from my public Facebook post (linked below) or share the link to my commentary website (<https://wethefourth.org>) in your new post to generate a thumbnail preview.

(<https://www.facebook.com/nick.maxwell.56/posts/10156883662191791>)

To date, mainstream media has not reported on this matter.

#JusticeForNewMexicans

Nick Maxwell,
resident of Lea County

{At <<https://wethefourth.org>>, scroll down to this document, listed under the date April 27, 2020.}

The Holtec Partnership, Probed

What the Hobbs News-Sun and Associated Press aren't reporting:

April 27, 2020

<https://wethefourth.org>

(LEA COUNTY, NM) -- This past Friday, State Auditor Brian Colón confirmed the open investigation of a procurement complaint filed last year against the Eddy-Lea Energy Alliance, a regional government in a partnership with Holtec International to site a large nuclear waste storage facility in Lea County.

Last July, Lea County resident Nick Maxwell brought the complaint to the state auditor's office and publicly issued his accompanying statement to the press. His complaint alleged that public officers of Eddy-Lea Energy Alliance (ELEA) had colluded with executives of Holtec in a joint-effort to defraud a competitive public procurement. Notably absent from the mainstream media outlets has been any report about the state's receipt of Maxwell's complaint for prohibited bidding.

Equipped with New Mexico's inspection statutes, Maxwell had obtained the invoice of the attorney who had been commissioned by ELEA to draft a revenue sharing deal in the later months of 2015. According to the invoice, this deal was secretly slipped exclusively to Holtec in anticipation of ELEA's announcement of a competitive public procurement offering the purchase of the group's publicly owned surface rights for the purpose of siting a nuclear storage facility. Not long thereafter and near the beginning of 2016, the deal was kicked back to ELEA within Holtec's sealed proposal at the end of public procurement.

The attorney had been tasked with preparing the terms which outlined this procurement. Per those terms, proposals from the public would have to include a revenue sharing deal for consideration.

Maxwell has alleged ELEA's tax-funded kickback deal was a bribe: a fabricated promise returned by Holtec for allocating no less than 30% of their future revenues to ELEA should

Holtec receive a facility license from the Nuclear Regulatory Commission and get everything operational. In effect, future costs associated with Holtec's storage facility may become artificially inflated to afford the "30% bribery cuts" that will get regularly paid out to ELEA for their enduring "local public support".

Even in the state of New Mexico, white collar crimes such as bribery can be charged as racketeering scams when organizations attempt to pass off their crime as legitimate business activities. If held liable for commissioning their henchman-in-fact attorney to broker a bribe, the energy alliance could face asset forfeiture of Holtec's promised land to the State of New Mexico as well as involuntary judicial dissolution of the local government-owned limited liability company.

John Heaton, longtime chief officer of ELEA and former state representative in the Democratic Party, has kept his high seat on the board of directors of the energy alliance despite the investigation.

Maxwell commented on the auditor's [investigation](#), "The people of New Mexico demand and deserve transparency, honesty, and integrity from their public officials. This organized effort from ELEA and their partner to broker a favorable bribe had resulted in a less-than-competitive public procurement and should be exposed as a criminal racket funded from the public treasury. Any billion-dollar bid rigging conspiracy like this must be brought to justice for New Mexicans before it is too late."

author: [Nick Maxwell](#)

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Update on June 25, 2020 --

[Report: Company Decommissioning Pilgrim Nuclear Plant Under Criminal Investigation](#)

[As reported by WBUR.](#)

<<https://www.wbur.org/earthwhile/2020/06/25/plymouth-nuclear-plant-decommissioning-company-criminal-investigation>>

Holtec International, owner of the Pilgrim Nuclear Plant, and conducting its decommissioning and high-level radioactive waste management, has also proposed a highly controversial consolidated interim storage facility for commercial irradiated nuclear fuel in New Mexico.

Update on July 6, 2020 --

[Court rejects George Norcross challenge to EDA task-force probe](#)

As reported by Jim Walsch of the [Cherry Hill Courier-Post](#).

<<https://www.courierpostonline.com/story/news/2020/07/06/george-norcross-economic-development-authority-task-force-lawsuit-phil-murphy/5383118002/>>

Cherry Hill, NJ has long been a Holtec International headquarters location.

[George Norcross III is a Holtec International board of directors member.](#)

<<https://holtecinternational.com/company/leadership/board-of-directors/george-e-norcross/>>

Although not mentioned in the article linked above, Holtec International and its CEO, Krishna Singh, are also under criminal investigation in New Jersey re: the NJ Economic Development Authority (EDA).

As revealed last year by ProPublica and WNYC, Holtec International CEO Krishna Singh provided false information, under oath, and signed his signature onto a NJ EDA tax break application form, winning him and Holtec \$260 million in tax incentives. Singh and Holtec then used the money to build its newest headquarters and fabrication plant, in Camden, NJ.

The false statement involved Singh's denial that Holtec had ever been barred from doing business with a state of federal government agency. In fact, Holtec had been barred from doing business with the Tennessee Valley Authority, after a bribery conviction of a TVA official at the Browns Ferry nuclear power plant. Singh was implicated in paying the official a \$55,000 bribe, to secure a radioactive waste management contract at the triple-reactor facility in Alabama.

Also not mentioned in the article linked above is the fact that a third Norcross brother serves as a Member of the U.S. House of Representatives. U.S. Rep. Norcross (D-NJ) has voted in favor of legislation favorable to Holtec International, namely the legalization of the U.S. Department of Energy taking title (ownership) and liability for irradiated nuclear fuel at a private interim storage site, even in the absence of a licensed and operating deep geologic repository. Holtec International has applied for a license to build and operate a consolidated interim storage facility in New Mexico, and hopes DOE (that is, American taxpayers) will pay all the bills (including a handsome profit margin to Holtec). Never mind that the law of the land has long been that, while DOE (taxpayers) is responsible for permanent disposal, the nuclear utilities are responsible for interim storage.

As Holtec's implication in a bribery conviction, additional alleged bribery, and then its CEO, Krishna Singh, lying about Holtec's disbarment from doing business with TVA, are all evidence that Holtec's and Krishna Singh's character and integrity do not meet NRC's regulatory requirements. For this reason, NRC should not grant Holtec a license to construct and operate this CISF.

Sincerely,

Kevin Kamps
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www.beyondnuclear.org

Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.

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Federal Register Notice: 85FR16150
Comment Number: 3870

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MESSAGE	36299	9/3/2020 1:02:27 PM

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