

Docket, Hearing

From: Riverkeeper <info@Riverkeeper.org> on behalf of Jude Jussim <info@Riverkeeper.org>
Sent: Wednesday, October 21, 2020 2:34 PM
To: CMRHanson Resource
Subject: [External_Sender] Fully adjudicate all pending petitions on Docket Nos. 50-3, 50-247 and 50-286

Oct 21, 2020

Christopher Hanson, NRC Commissioner

Dear: Hanson, NRC Commissioner,

The Nuclear Regulatory Commission (the "Commission") must fully adjudicate all of the pending petitions regarding the proposed transfer of Indian Point Energy Center ("IPEC"), prior to making a determination on the license transfer application and related exemption requests.

There are pending petitions to intervene, submitted by the State, Riverkeeper, and others. Approving the transfer without acting on these petitions would place the public at risk. It is essential that the concerns raised in the petitions about Holtec's financial qualifications and character be properly assessed and mitigated if necessary.

Holtec's past and even its present actions in New Jersey, show a lack of character, competence, and integrity, as well as the necessary candor and willingness to abide by NRC regulatory requirements. Holtec is currently under criminal investigation in New Jersey for perjury and fraud, and is financially unsound. In addition, a lawsuit filed by Lacey Township makes it plain that Holtec willfully violated local laws and did not stop certain work at Oyster Creek until the municipality obtained an injunction from a court.

The costly process of decommissioning of nuclear power plants can last decades and involve the complex removal and disposal of radioactive materials, presenting a significant risk to the community if not properly executed. It's not something that a company that has demonstrated it's willingness to skirt the law should be allowed to do!

The law provides safeguards to ensure that decommissioning is safely and completely executed, including funding from decommissioning trust funds made up in part of rate payer contributions-- which totals over \$2 billion for the three Indian Point reactors. Failure to comply with these laws may lead to significant safety and financial ramifications for the public. Further, corner cutting may impact both the safety and job security of the many IPEC employees both current and future. Giving this huge responsibility to an untrustworthy company would only put the local communities, IPEC employees, and New York State taxpayers at risk, especially in light of Holtec's proven record of cutting corners to maximize its own profits.

Therefore, the Commission must fully adjudicate all pending petitions on Docket Nos. 50-3, 50-247 and 50-286 before issuing a determination on the Indian Point license transfer application. As part of this process, I urge the Commission to examine the proposed license transfers and exception requests, giving heightened scrutiny to financial and character qualifications of Holtec, and requiring financial assurances as needed to protect the public.

Sincerely,

Jude Jussim
397 7th St # 1
Brooklyn, NY 11215-3312

judejussim@gmail.com