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Holtec Decommissioning International, LLC Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3 Post-Shutdown Decommissioning Activities Report

Comment On: NRC-2021-0125-0002

Holtec Decommissioning International, LLC; Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3; Post-Shutdown Decommissioning Activities Report

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General Comment

From the NRC website : “The NRC's mission is to license and regulate the Nation's civilian use of radioactive materials to provide reasonable assurance of adequate protection of public health and safety and to promote the common defense and security and to protect the environment”

These are a few questions I would like to pose :

Can we be reasonably assured that we are adequately protected when we have been left to coexist with the Indian Point Energy Center for 59 years without a viable evacuation plan?

Can we feel assured in regard to promotion of the common defense when Holtec’s Post Shutdown Decommissioning Activities Report includes the use of a containment system for spent nuclear fuel consisting of thin walled canisters inside concrete cask lined up on a concrete tarmac – a configuration more vulnerable to terrorism? Why are we not seeking a safer system, using the plan followed in many European countries where nuclear waste is stored in more robust canisters inside hardened building structures?

Should we be assured of adequate protection of public health and safety when the PSDAR submitted by Holtec makes no mention of the three pipelines crossing IPEC property, and the unassessed risk that demolition work during decommissioning will add to the improperly permitted 42 inch AIM pipeline? (The NRC Office of the Inspector General’s investigation concluded that the safety assessment of this pipeline was reverse engineered to result in its approval, yet none of the agencies with responsibility for public safety have taken steps to address this issue.) And what about the risk of close proximity to

intersecting earthquake fault lines? Is there any anticipation of additional environmental issues related to the effects of climate change?

Should we feel safe when we hear that, although the common wisdom regarding high burnup fuel has been that this more highly radioactive fuel requires at least seven years or more prior to transition to dry cask storage, Holtec is promising to compress this process to three years. And what about radiation monitoring and site remediation - should we feel safe when we read that Holtec has no plan to remediate contamination that is leaking into the groundwater and the Hudson River, or to do more than superficial cleanup of contaminated soil? And what about radiation monitoring - there is no indication in the shutdown plan for off-site monitoring, or for monitoring of the canisters for evidence of pressure or temperature changes, cracks or other problems that could lead to radiation leakage. How does this assure the safety of the workers involved? How can the community possibly feel safe when it is clear that the work of demolition will result in the dissemination of airborne radioactive particles and gases, and that the NRC has no requirement for monitoring of such contamination outside the perimeter of the nuclear plant?

And finally, a word about environmental justice – something that is not mentioned in your mission statement but must be considered. Holtec is planning to ship IPEC's radioactive waste including spent fuel on barges downriver to complete the first part of its journey. How can we feel secure in the thought of this deadly cargo being shipped past numerous towns and cities, then overland via aging roads and bridges, to be delivered to an environmental justice community as its destination, to communities often indigenous or Latinx, that have already suffered greatly in the interest of the nuclear industry? These "interim" sites could well become permanent, and the Holtec sites in New Mexico and Texas are located near fossil fuel extraction sites, increasing the earthquake risk in those areas. What is the emergency plan for this transportation process in the event of a disaster along the way? What is the rationale for proceeding with this unreasonably dangerous plan, when the likelihood of a permanent storage site seems minimal? There needs to be recognition of the fact that this waste will more than likely remain on-site for at least the life span of the thin walled canisters. It should remain where it was created and where its benefits were utilized. Furthermore, transportability is being offered as the rationale for the thin walled canisters.

In closing, I must ask how we can appeal to your sense of responsibility to honor your mission statement. I urge you at the NRC to put the safety and welfare of people ahead of the interests of the nuclear industry, and to heed the input of experts who have presented testimony to you, some of which you have deemed not credible. The stakes here are far too high to allow for even the smallest risk – we have all witnessed the unpredictability of catastrophic events that could not have been predicted, yet occurred. A disaster at Indian Point will result in devastation that is unimaginable for this region, this state and this country and that will be your legacy.