

From: Michael Cunningham <mcunningham@townofcortlandt.com>
Sent: Wednesday, August 25, 2021 11:34 AM
To: NRC-EJReview Resource
Cc: Linda Puglisi
Subject: [External_Sender] Comments Pertaining to NRC-2021-0137: Systematic Assessment for How the NRC Addresses Environmental Justice in Its Programs, Policies, and Activities
Attachments: NRC Letter_Executed_8.25.21.pdf

Good Morning,

Attached please find comments to the above-referenced matter.

Thank you,

Michael

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Federal Register Notice: 86FR36307
Comment Number: 14

Mail Envelope Properties (769d365de0f64c2da0a5d3d981ade24c)

Subject: [External_Sender] Comments Pertaining to NRC-2021-0137: Systematic Assessment for How the NRC Addresses Environmental Justice in Its Programs, Policies, and Activities
Sent Date: 8/25/2021 11:34:13 AM
Received Date: 8/25/2021 11:34:50 AM
From: Michael Cunningham

Created By: mcunningham@townofcortlandt.com

Recipients:
"Linda Puglisi" <lindap@townofcortlandt.com>
Tracking Status: None
"NRC-EJReview Resource" <NRC-EJReview@nrc.gov>
Tracking Status: None

Post Office: townofcortlandt.com

Files	Size	Date & Time
MESSAGE	577	8/25/2021 11:34:50 AM
NRC Letter_Executed_8.25.21.pdf		527927

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:



LINDA D. PUGLISI
Town Supervisor

TOWN OF CORTLANDT

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August 25, 2021

Submitted Via Email

Chairman Christopher T. Hanson
U.S. Nuclear Regulatory Commission

Re: Comments Pertaining to NRC-2021-0137: Systematic Assessment for How the NRC Addresses Environmental Justice in Its Programs, Policies, and Activities

Dear Chairman Hanson,

As the Supervisor of the Town of Cortlandt ("Town"), I write to you to provide constructive suggestions about how to increase opportunities for communication between the NRC and the local communities impacted by the NRC's decisions.

As you are likely aware, the Indian Point Energy Center ("IPEC") is located in the Village of Buchanan and Town of Cortlandt. IPEC helped power the New York Metropolitan area for decades. However, its operations totally ceased on April 30, 2021, and decommissioning is currently underway. IPEC has historically provided significant revenue to the Town, Village of Buchanan ("Village"), and the Hendrick Hudson School District ("School District").¹

Since the time that the Taxing Jurisdictions were alerted about the intention to close Indian Point several years ago, it seems like we have all been working tirelessly to guide our respective municipal entities through uncharted waters. We believe that if the suggestions below were followed in our community, it would have gone a long way in assuaging the concerns of elected officials, staff, and residents.

I. Increased Communication Prior to the Decision to Shutdown a Nuclear Plant

Being informed that IPEC was shutting down was a jolting experience. This is because nobody who made this decision ever solicited feedback from the Town or the Village as to how this would affect the local community. Admittedly, the Town's and Village's elected officials and staff would have worked hard to persuade the NRC to keep IPEC operational for several more years. Even if the NRC still had chosen to close IPEC, the community would have at least felt that it had a seat at the table. Instead, the decision to close IPEC has felt like it was forced upon the local community from a distant governmental entity (N.Y State). It has led to distrust and overall skepticism. We know that having the opportunity to share the local community's feedback prior to a final decision would have created a more trusting relationship.

II. Increased Communication During the License Transfer Review Process

¹ The Town, Village, and School District are collectively referred to as the "Taxing Jurisdictions". The Village and School District are partners with the Town with respect with IPEC-related concerns.

While the Town was very displeased with the lack of communication about the decision to shut down IPEC, there also was also a lack of communication during the decommissioning application review process. This lack of communication was a significant factor in forcing the Taxing Jurisdictions to commence a legal action seeking to intervene in the license transfer proceedings from the prior owner, Entergy Nuclear Operations, Inc. and its affiliated entities ("Entergy"), to Holtec Decommissioning International, LLC and its affiliated entities ("Holtec"). Greater communication between the NRC and the community likely could have prevented this litigation, which has subsequently been resolved.


III. Greater Transparency During the Decommissioning Process

Now that decommissioning is taking place, the Town would push for greater transparency throughout the process. The Town is willing to offer its Town Hall or other meeting facilities in order for the NRC to regularly update the community. In addition, the Town and Village would request a briefing directly from the NRC alerting the Taxing Jurisdictions as to how the decommissioning funds are being allocated during the process.

I am available to speak further about any of these points at your convenience.

Sincerely,

TOWN OF CORTLANDT

By: 
Linda D. Puglisi
Town Supervisor

cc: Town of Cortlandt Town Board
Mayor Theresa Knickerbocker, Mayor of the Village of Buchanan and Trustees
Hendrick Hudson School District School Board
Joseph E. Hochreiter, Superintendent of the Hendrick Hudson School District
Thomas F. Wood, Esq., Town of Cortlandt Town Attorney
Daniel Riesel, Esq., Sive, Paget & Riesel P.C.-Counsel to the Town of Cortlandt
Patty Robcke, Town of Cortlandt Comptroller
Enrique Catalan, Assistant Superintendent for Business, Hendrick Hudson School District
Stephanie Porteus, Esq., Village of Buchanan
NYSERDA
Holtec