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I plan to attend the NRC's meeting on June 29, 2021 on the Indian Point PSDAR and want to make sure I have my facts correct before I make any public statements. The following is the NRC's meeting announcement with both of you listed as the contact persons.

<https://www.nrc.gov/reading-rm/doc-collections/news/2021/21-007-i.pdf>

I have reviewed all the regulations and guidance related to site remediation and reviewed the Indian Point PSDAR. I attended the NRC's 2 day workshop recently on site remediation. The following is my understanding on site remediation, unrestricted release, partial site release and additional issues vital to the future of the Indian Point site. I would appreciate confirmation during the meeting that my understandings are correct.

1. According to the Indian Point PSDAR, the entire site, with the exception of the ISFSI area will be release for unrestricted use as defined by 10 CFR 20.1402, however the surface dose rates may be reduced by local and the State of New York requirements and agreements.
2. There is no discussion in the Indian Point PSDAR of release under restricted conditions as described in 10 CFR 20.1403 and appears to have been common practice at both Maine and Connecticut Yankee. I assume partial release is not an option. There are no present plans for restricted use release as defined in 10 CFR 20.1403
3. Unrestricted use, as discussed by NEI and the NRC during the NRC workshop, will include the unrestricted residential use, industrial use, and possible power generation including potential new nuclear facilities.
4. There are no present plans for engineered barriers to facilitate unrestricted release as discussed in NUREG 1757.

- The screening values or isotopic concentrations remaining at the site will be less than the values stated in NUREG 1757, Table H.2 "Screening Values (pCi/g) of Common Radionuclides." It is assumed that any soil containing radioactive concentrations in excess of these values will be removed prior to release for unrestricted use.

APPENDIX H

Table H.2 Screening Values* (pCi/g) of Common Radionuclides for Soil Surface Contamination Levels

Radionuclide	Symbol	Surface Soil Screening Values ^b
Hydrogen-3	³ H	110
Carbon-14	¹⁴ C	12
Sodium-22	²² Na	4.3
Sulfur-35	³⁵ S	270
Chlorine-36	³⁶ Cl	0.36
Calcium-45	⁴⁵ Ca	57
Scandium-46	⁴⁶ Sc	15
Manganese-54	⁵⁴ Mn	15
Iron-55	⁵⁵ Fe	10000
Cobalt-57	⁵⁷ Co	150
Cobalt-60	⁶⁰ Co	3.8
Nickel-59	⁵⁹ Ni	5500
Nickel-63	⁶³ Ni	2100
Strontium-90	⁹⁰ Sr	1.7
Niobium-94	⁹⁴ Nb	5.8
Technetium-99	⁹⁹ Tc	19
Iodine-129	¹²⁹ I	0.5
Cesium-134	¹³⁴ Cs	5.7
Cesium-137	¹³⁷ Cs	11
Europium-152	¹⁵² Eu	8.7
Europium-154	¹⁵⁴ Eu	8
Iridium-192	¹⁹² Ir	41
Lead-210	²¹⁰ Pb	0.9
Radium-226	²²⁶ Ra	0.7
Radium-226+C ^c	²²⁶ Ra+C	0.6
Actinium-227	²²⁷ Ac	0.5
Actinium-227+C	²²⁷ Ac+C	0.5
Thorium-228	²²⁸ Th	4.7

- According to the PSDAR, "During demolition, above-ground structures will be removed to a nominal depth of three (3) feet below the surrounding grade level", however remaining concrete may contain highly contaminated piping with unspecified levels of radioactive contamination.
- Radioactive surface and internal pipe contamination (no limits specified) will remain buried within the containing concrete structures. This will be consistent with the practices of Maine and Connecticut Yankee sites.
- Twenty five years after shutdown of Maine and Connecticut Yankee, the sites have not been released for "unrestricted" use. This is in addition to the ISFSI portion of the site licensed under 10 CFR 72.
- "Rubblization" as proposed at Maine Yankee will not be considered.

10. The PSDAR states: "Final site restoration will be completed after ISFSI decommissioning and demolition is completed." It is assumed this to be the responsibility of the licensee and decommissioning funding is provided.
11. The PSDAR states: *"The estimated LLRW volume (Class A, B, and C) for IPEC that is destined for land disposal will be approximately 7.1 million cubic feet using the DECON method. Of this volume, approximately 3.3 million cubic feet is estimated to be soil contaminated at very low levels."* This term "low levels" and subsequent "very low-level radioactive waste" needs a clear regulatory definition.
12. The PSDAR discusses "partial site release", a term that needs clear definition.
13. NUREG 1757 (below) discusses buried material on a licensed site, not a site released for "unrestricted use". A site released for unrestricted use is not a licensed site.

"J.1 Generic Description of Situations

This appendix describes examples of situations warranting alternative conceptual models which may occur at sites undergoing decommissioning. The first situation discusses buried radioactive material or subsurface contamination at a site. The second situation discusses subsurface structures or basements which are backfilled and left as part of the end state of the site.

*J.1.1 Buried Radioactive Material or Subsurface Soil Contamination
A licensed site has the following characteristics for purposes of the conceptual model for buried radioactivity: "*

It is not clear from this statement what is meant by a "licensed site" in this context.

If time is not available to discuss all of these concerns during the meeting, many members of the public have indicated they would be interested in a detailed open dialog with the NRC.

Assuming the NRC is not able to provide responses to Indian Point decommissioning issues on July 29, 2021, I formally request a "town hall and roundtable discussions, and open house meetings." As described by "A Notice by the Nuclear Regulatory Commission on 03/19/2021" described below.

Enhancing Participation in NRC Public Meetings

<https://www.federalregister.gov/documents/2021/03/19/2021-05787/enhancing-participation-in-nrc-public-meetings>

Information Meeting With a Question and Answer Session

Meeting Purpose—The purpose of this type of meeting is for the NRC to share information and discuss applicable regulatory issues and NRC actions with meeting attendees. The meeting will inform the public by providing information to help them understand the applicable regulatory issues and NRC actions through NRC presentations and discussions with NRC staff. These are organized, yet informal opportunities to interact with and ask questions of the NRC staff not associated with a more traditional public meeting format.

Level of Participation—This type of meeting is tailored to inform attendees and allow them to ask questions. The NRC staff should strive to ensure sufficient time is allotted for an Information Meeting with a Question and Answer Session to ensure that members of the public can pose their questions and have them answered during the meeting. Whether all questions are addressed or not, the NRC should emphasize ways members of the public can ask questions outside the meeting.

Description—Meetings in this category are held with interested parties, including representatives of non-government organizations, private citizens, or various businesses or industries, to engage them in a discussion of regulatory issues. The following description will be included in the notice for an Information Meeting with a Question and Answer Session:

The purpose of this meeting is for the NRC staff to meet directly with individuals to discuss regulatory and technical issues. Attendees will have an opportunity to ask questions of the NRC staff or make comments about the issues discussed throughout the meeting, however the NRC is not actively soliciting comments towards regulatory decisions at this meeting.

Examples—Meetings of this category may include town hall and roundtable discussions, and open house meetings.

We look forward to a productive meeting with the NRC on July 29, 2021 with a follow-up Information Meeting With a Question and Answer Session as described in the Federal Register.

Very truly yours,

A handwritten signature in black ink that reads "Paul M. Blanch". The signature is written in a cursive style with a large initial 'P'.

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