

SUNI Review Complete  
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# PUBLIC SUBMISSION

ADD: Richard Guzman,  
Mary Neely  
Comment (17) Doc.  
0002  
Publication Date:  
7/15/2021  
Citation: 86 FR 37346

<b>As of:</b> 10/20/21 12:50 PM <b>Received:</b> October 15, 2021 <b>Status:</b> Pending_Post <b>Tracking No.</b> kus-1604-816x <b>Comments Due:</b> October 22, 2021 <b>Submission Type:</b> Web
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**Docket:** NRC-2021-0125

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

**Document:** NRC-2021-0125-DRAFT-0019

Comment on FR Doc # 2021-15068

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## Submitter Information

**Email:** lahc@westchestergov.com

**Government Agency Type:** Local

**Government Agency:** Westchester County Board of Legislators

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## General Comment

See attached file(s) Please see attached letter submitted on behalf of the Westchester County Board of Legislators regarding the Indian Point PSDAR  
Docket ID NRC-2021-0125

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## Attachments

NRC FINAL Comments on Indian Point PSDAR 101521



October 15, 2021

Submitted electronically via <https://www.regulations.gov>

Docket ID NRC-2021-0125

Comments on the Indian Point Post Shutdown Decommissioning Activities Report (PSDAR)

We, the undersigned Westchester County Legislators, submit these comments on the Indian Point PSDAR to urge the NRC to be vigilant and proactive by taking and/or requiring necessary measures to safely decommission, remediate and restore the Indian Point site to productive use. Potential risks and impacts identified below are exacerbated due to densely populated surroundings and close proximity to the Buchanan-Verplanck Elementary School and the City of Peekskill, which has been defined by New York State Department of Environmental Conservation as a Potential Environmental Justice Area.

**Gas Pipelines.** The presence of natural gas and high-pressure gas pipelines running adjacent to and beneath the site multiply and compound the potential hazards associated with decommissioning. We find it inexplicable and reckless that there was no safety evaluation done prior to installation of the AIM/Algonquin Pipeline Expansion.

**Radioactive Leaks.** The PSDAR fails to assess how excavation activity escalates the potential for radioactive leaks and/or rupture of the gas pipelines. Excavation will involve moving heavy machinery onto the site, disturbing soil conditions, and demolishing structures with a prior history of contamination. Certain activities will increase the likelihood of radioactive release, particularly if they coincide with extreme weather events, which are becoming more common. We are particularly concerned about pre-existing leaks that are likely to release radioactivity when certain structures are dismantled.

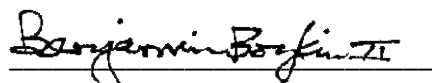
**Long-term Storage of Nuclear Waste.** The PSDAR provides a decommissioning timeline based on certain stated assumptions. One assumption is that nuclear waste will be removed from Indian Point to an interim storage facility in southeast New Mexico. Such facility has not yet been built or licensed and it faces major opposition. Nearby Indigenous and Hispanic populations have already suffered disproportionately high adverse human health and environmental effects from nuclear energy and weapons programs of the United States, which is a grave environmental injustice. The New Mexico Attorney General has sued to block the facility, citing, among other objections, negative impacts to the state's agricultural economy as well as the oil and gas industry. Transporting nuclear waste through densely populated areas, utilizing aging and vulnerable infrastructure gives rise to serious safety and security concerns. Based on these potential impacts and hazards, it is reasonable to expect that spent fuel would remain where it is, at least until the federal government builds a permanent repository. Given the obstacles associated with establishing an interim storage site, there needs to be a contingency plan for storage of high-level nuclear waste at Indian Point.

**Mitigation.** In addition to a contingency plan for onsite storage of nuclear waste, the following proactive measures are necessary to mitigate the catastrophic risks associated with demolition, excavation and other onsite decommissioning activities.

- Pipeline gas shut off during excavation work
- Detailed decommissioning timeline with sufficient description of planned activities, updated as necessary to reflect changes due to weather, supply problems, labor issues, etc.
- Public notice for high-risk excavation and demolition activities which would exacerbate risk of rupture or release, to allow risk assessment and, if advisable, extra precautions for those who are particularly vulnerable to radioactivity (e.g., children and pregnant women)
- Comprehensive baseline inventory of onsite contaminants
- Robust ongoing monitoring program using state-of-the-art technology and equipment
- Website to facilitate public access to updated decommissioning timeline and monitoring information
- Contingency plan for radioactive leak containment (e.g., shielded nuclear radiation containment chambers)
- Resident inspector to keep a close watch on site safety during excavation and demolition
- Oversight and investigation reports with detailed and specific findings

Now, more than ever, the Nuclear Regulatory Commission must prioritize the health and safety of people over the interests of the nuclear industry.


Sincerely,



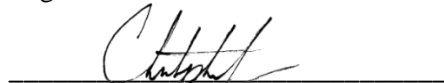
Chairman Benjamin Boykin II  
Legislator, 5<sup>th</sup> District



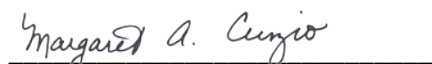
Vice Chair Alfreda A. Williams  
Legislator, 8<sup>th</sup> District



Majority Leader MaryJane Shimsky  
Legislator, 12<sup>th</sup> District



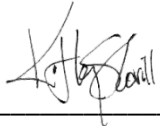
Majority Whip Christopher A. Johnson  
Legislator, 16<sup>th</sup> District



Minority Leader Margaret A. Cunzio  
Legislator, 3<sup>rd</sup> District

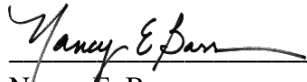


Colin D. Smith  
Legislator, 1<sup>st</sup> District



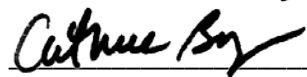
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Kitley S. Covill  
Legislator, 2<sup>nd</sup> District



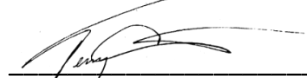
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Nancy E. Barr  
Legislator, 6<sup>th</sup> District



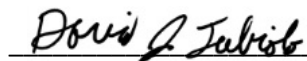
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Catherine Borgia  
Legislator, 9<sup>th</sup> District



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Terry Clements  
Legislator, 11<sup>th</sup> District



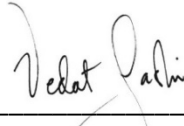
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David Tubiolo  
Legislator, 14<sup>th</sup> District



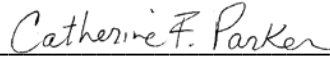
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Jose I. Alvarado  
Legislator, 17<sup>th</sup> District



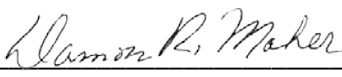
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Vedat Gashi  
Legislator, 4<sup>th</sup> District



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Catherine F. Parker  
Legislator, 7<sup>th</sup> District



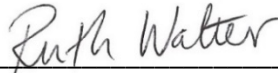
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Damon R. Maher  
Legislator, 10<sup>th</sup> District



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Tyrae Woodson-Samuels  
Legislator, 13<sup>th</sup> District



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Ruth Walter  
Legislator, 15<sup>th</sup> District