

# PUBLIC SUBMISSION

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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

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## Submitter Information

**Name:** Patrick Hewes

**Address:**

Irvington, NY, 10533

**Email:** patrickhewes1@gmail.com

**Phone:** 917-232-2332

## General Comment

I submitted this yesterday with an attachment, but the attachment contained my name. In case that personal information disallowed using my comments, I am re-sending the comments herein.

The NRC's decommissioning process for Indian Point by Holtec is inadequate. Due to the multiple unknowns of decommissioning nuclear plants in the US, and due to Holtec's shady history, it is imperative that the residents of the Hudson Valley and for residents of other nuclear plants facing decommissioning will be safe, and will be completed under contracts that ensure the costs are not borne by taxpayers once the trust fund is depleted.

Safety: Cask and canister issues are at this point inadequate, 20 to 25 year warranty is not a safe time period given the life of radioactivity and the limited proof of durability. Visual inspection is a weak tool to monitor the condition of casks and canisters. Storage of canisters inside casks need to be stored not lined up as easy target for malfeasance, rather, should be arranged with defense of attack in mind. Science shows that high-burnup fuel is hotter and more radioactive than ordinary spent fuel, and three years of time in the fuel pool is not proven to be sufficient before moving to dry cask storage.

Radiation Monitoring.

Without a plan for radiation monitoring, there is no way to detect deterioration of canisters. Similar to visual inspection, perimeter monitoring of the site is too distant and too general of a plan for conditions on site. Past the perimeter, off-site monitoring for residents still growing, which science shows is the population most vulnerable to exposure to environmental hazards, must be included.

Pipeline risks

The current plan omits existing gas pipelines adjacent to the site. NRC must work with State and federal regulators to coordinate cumulative impacts of both Indian Point failures during commissioning on gas pipelines, and gas pipeline failures impacts on Indian Point in the decommissioning and completed

decommissioned project.

#### Earthquake Zones

There is so much additional information available given the advances in geology since the design and siting of Indian Point, that any de-commissioning plan needs to revisit geology and the study of earthquakes with fresh eyes to determine any plan for siting, constructing, and decommissioning a nuclear plant.

#### Emergency Planning and Response

This component of decommissioning must be an on-going practice for the duration of the period that spent fuel rods are on site.

#### Transportation of highly radioactive fuel rods

Barge transportation down river from Buchanan NY past the population centers along the river is not proven, not explained, not fully analyzed for impacts and risks. Moving fuel rods by rail and by road is similarly not fully analyzed and in any case represents a major risks to residents, and, the condition of these local, county, and state roads, bridges, overpasses, rail crossings, underpass components of infrastructure are not fully analyzed.

#### Environmental justice concerns

Impacts of decommissioning nuclear plants on communities of color and communities of low income are documented to have been historically neglected. This is a fact. The plan to decommission the Indian Point Nuclear Plant includes imposing a thousand year plus burden of hosting radioactive material on communities that are already disproportionately burdened with the broader society's off-loading of toxic waste and material of the twentieth century. NRC must consider different equitable and safe solutions to the economic and social conveniently excluded impacts of nuclear energy.

#### Autopsy IP

The NRC must include an assessment of how this decommissioning worked out, so that other decommissioning projects can be completed based on findings, experience, and outcomes.

Financial Risk to New York residents who have built up the decommissioning trust fund through electric rates.

Any contract with Holtec or any other entity engaged to complete this decommissioning must be contractually obligated to pay for any costs above and beyond the Decommissioning Trust Fund.

#### NRC oversight

NRC does not have a record of representing the public interest, rather, it has a record of coddling a heavily subsidized nuclear power industry. The final step of protecting the public interest is the storage and custody of the radioactive nuclear waste. That storage will last generations. NRC's current plans to allow for interim storage means a permanent solution of storage would require moving the waste a second time. This adds additional risk to the decommissioning process, potentially de-couples Holtec's responsibilities to place the waste safely, and opens up unknown risks on an unknown timetable far into the future. The NRC must, instead, develop a complete safe and fully understood plan to store the waste on site as the least risky plan for the public.