

RE: Docket ID NRC-2021-0125

ADD: Richard Guzman, Mary Neely
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To Whom It May Concern,

The closure of Indian Point has many issues and loopholes. We have a nefarious company, Holtec, that has been awarded the task of closure and it is in their best interests to do this quickly, without much oversight and without quality products or a real plan.

We have concerns that the casks and canisters for containment of radioactive nuclear waste will be mishandled as their products cannot be maintained, monitored or retrieved in such a way as to protect against radioactive leaks or hydrogen gas explosions, according to the standards set by The Nuclear Waste Technical Review Board. The canisters by all accounts must be much thicker, 10-20 inches thick and stored in hardened buildings or deep earth berms.

Holtec has a "fast track plan" that is most concerning regarding high burn up radioactive fuel waste which needs at least seven years to cool. Compressing the time frame into three years to accommodate Holtec's desire to keep more money, puts the decommissioning workers and the public at risk.

When Holtec requested to have the license transfer from Entergy for the decommissioning, they knew that years of radioactive leaks have contaminated the groundwater, the rock base and the Hudson River. They must be held accountable for a proper clean up of the radioactive waste water. The Hudson River is the River That Flows Both Ways and radioactive nuclides that are in the water contaminates the water for the people of the 7 Towns who rely on the Hudson River for their daily needs - such as drinking water. The radioactive waste harms aquatic life and the River itself, which we consider to be a living being. What is their plan?

There MUST be funds set aside from the huge kitty that Holtec has at its disposal for scientific radiation monitoring for the workers - on site and for the public-residents of the surrounding area as well as for the schools where children spend much of their time. This must be mandatory. This is because decommissioning will bring radioactive materials and other toxins into the air and water. Furthermore, this goes back to the issue of Holtec's inadequate, terribly thin and weak cannister systems which cannot even be checked for leaks or cracks.

Hotec has absolutely no experience in transporting radioactive waste. Neither on-site or off-site. There is no plan that is safe for the public. Not by barge, by truck, by train, by plane. Furthermore, this radioactive waste must not be exported to Indigenous and Environmental Justice Disadvantaged Communities in Texas and New Mexico that are already suffering ill health and severe water poisoning from mining waste.

The NRC has allowed Holtec to make unauthorized design changes that are seriously flawed, to be accepted. The NRC has a fiduciary duty to protect the public. The NRC seems to have no interest in this part of their mandate for oversight. Their role as Regulators is already compromised as far as we can tell. We the people, many of whom are scientists, educators, physicians, nuclear engineers etc,,, have been dismissed continuously for many years. It is time that the NRC carefully review the many comments from citizens, no matter what their background. There is no such thing as "not credible". I

suppose when there is a radioactive leak then it will be credible? We believe that the NRC itself is not credible.

Having grown up in Palisades, Rockland County, New York, we had the benefit of having the world renowned Columbia University Lamont Dougherty Earth Observatory literally in our backyard. Lamont is known for its scientific and peer reviewed studies regarding earthquakes. As you know, Indian Point was built in an earthquake zone with two fault lines. Who ever thought that was a good idea was an absolute idiot. We are now in a position where there are three natural gas pipelines: two much older that run under Indian Point and one brand new whopping 42 inch high pressure gas pipeline-the Aim Pipeline, that lands 105 feet from critical infrastructure meant to help cool the cooling ponds. One of the brilliant people at Indian Point - in collaboration with the NRC and FERC and PHMSA all thought that a "plan" on the back of a napkin was all right. Well, it's not. Earthquakes do happen. This is another instance of the NRC dismissing scientist and citizens points of concern

The Aim Pipeline MUST be shut down for the entire length of time of the decommissioning of Indian Point. This is a very dangerous pipeline that is monitored by people in Houston, Texas and we have a problem NASA! The shut off valve doesn't work in three minutes. Maybe three hours-- maybe three days - maybe three weeks- maybe three months. Maybe not at all if whomever is supposed to be monitoring the pressure-gets distracted, falls asleep or doesn't think that in their estimation a leak might warrant a closer look. The NRC's Office of Inspector General severely criticized the NRC staff for dismissing the danger of an explosion as "not credible.". Instead, staff ignored key data and tailored a model of explosion risks to fit their own desired conclusion that "no action was necessary."

With twenty million people at risk and with people in the immediate area at great risk, we demand that the 42 inch high pressure gas pipeline be shut down. We are at the point of demanding as begging, imploring and pleading seems to have little to no effect. We demand this pipeline be shut down.

We believe that the NRC has made an enormous mistake by allowing Holtec to have the decommissioning license. Holtec has a fraudulent and criminal history, and does not have the public's health, safety and welfare in their plans. The NRC can review and appoint another company that not only has a good track record in decommissioning, but also is not criminal. We are worried about the big pay day for Holtec at the public's expense as well as for the safety of the people.

Sincerely,
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