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Holtec Decommissioning International, LLC Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3 Post-Shutdown Decommissioning Activities Report

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General Comment

See attached file(s)

Attachments

Indian Point PSDAR Sen. Harckham Comments

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

Thank you for the opportunity to submit formal comments on Holtec Decommissioning International's (HDI) Indian Point Post Shutdown Decommissioning Activities Report (PSDAR).

The Indian Point Energy Center (IPEC) is located in Buchanan, N.Y., which is in the heart of my 40th Senate District and just 36 miles from midtown Manhattan. Safe and secure decommissioning is in the best interests of my constituents and the entire metropolitan area.

Considering the importance of safety, it was alarming to hear from the Nuclear Regulatory Commission (NRC) that there will not be on-site inspectors during decommissioning. There must be continued monitoring on-site by qualified professionals using state-of-the-art technology during the entire decommissioning processes. While IPEC will no longer be in operation, the nuclear materials stored there continue to pose a significant danger for all the same reasons as when the plant was operational, with the additional complications of the heavy demolition work that will take place. On-site inspectors can prevent an emergency from turning into a disaster.

One of the best ways to achieve safety is by having an experienced work force in place to act as on-site inspectors. As an active facility, Indian Point was kept safe by many experienced men and women in various labor unions. As the decommissioning process unfolds, utilizing the technical expertise of dedicated labor unions as on-site inspectors should be a priority.

Among the top concerns of my constituents is that the heavy decommissioning work will be conducted while multiple high pressure gas pipelines continue to operate on the site. HDI and the NRC must assess the catastrophic consequences of a gas line rupture and explosion and devise the necessary precautions to prevent any such horrific incidents.

The PSDAR must take a serious look at shutting down the pipeline, at least during heavy demolition work, to prevent an accidental rupture and potential catastrophic explosion that could involve the release of radioactive vapors throughout the metropolitan area. Notably, there is a residential neighborhood, as well as an elementary school close to the plant.

On moving the nuclear waste from IPEC, the PSDAR makes the assumption that the spent fuel will be transported to an interim storage facility in New Mexico. However, such a facility has not yet been built and it faces major local opposition, including a lawsuit from the New Mexico Attorney General. It also seems unrealistic to expect that the nuclear waste from IPEC can be transported through densely populated areas, utilizing aging and vulnerable infrastructure.

Finally, the confidence of the local communities in the NRC has been eroded significantly over the years and especially during the run-up to the decommissioning, which included the revelation that its pipeline safety study was seriously flawed. In addition, negative stories about Holtec have created a credibility crisis in the community about the company's ability to safely and securely decommission IPEC.

The first step to regaining public confidence is to ensure that issues of public access, input, and transparency are appropriately addressed. HDI should have a detailed communications plan that includes public notice for significant decommissioning activities, ongoing social media outreach and the use of other key communications tools to facilitate information sharing and public comment. The community has been largely ignored by a federal government that seemed too bureaucratic to address its serious safety concerns. This must change.

I urge the NRC to take seriously and act on the concerns of this community, in the interests of tens of thousands of New Yorkers.

Sincerely,



Peter B. Harckham
New York State Senate, 40th S.D.