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

Comment On: NRC-2021-0125-0001

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

NRC IPEC PSDAR



SANDRA R.GALEF
Assemblywoman 95th District

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October 21, 2021

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Docket ID NRC-2021-0125

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

The NRC must act to ensure the safe and timely decommissioning of Indian Point. The PSDAR, as written, has key deficiencies that raise concerns about Holtec's ability to perform decommissioning without significant guidance from the NRC. The central concern to be raised is the credibility of Holtec Inc. Their track record is littered with cut corners and poor decision making. All other concerns flow from a concern that Holtec is unwilling to perform a rigorous decommissioning at Indian Point.

The PSDAR does not mention the presence of natural gas and high-pressure gas pipelines that traverse Indian Point. The effect of decommissioning on the safety of the AIM/Algonquin Pipeline Expansion is unknown. The PSDAR does not grapple with the danger decommissioning poses to the pipelines. The pipelines must be shut down during all excavations in the vicinity of the pipelines and during the transportation of heavy machinery, waste, or any other activity that could endanger the structural integrity of the pipeline. A brazen and cavalier approach to pipeline safety would greatly endanger countless lives of nearby school children, residents, and Holtec employees working on site. Without mention of the pipeline in the PSDAR one is left to wonder if Holtec is prepared to execute their mission with competence.

Spent nuclear fuel storage and management is one of the most important aspects of decommissioning. The PSDAR insists that the spent nuclear fuel will be removed by the DOE beginning in 2030 and completed by 2061. There is no evidence that this timeline is reasonable. There is no approved long-term storage location for the storage of this material. Holtec suggests use of an interim storage facility, but this will essentially foist spent nuclear fuel on a community that is opposed. This is inappropriate. There are also concerns that the infrastructure required to safely transport this waste from Indian Point to the proposed facility does not exist. Any means of transportation will entail spent nuclear fuel moving through very densely populated areas with few safeguards to prevent an adverse event. Holtec does not propose a possible alternative for the disposal of the spent nuclear fuel in either the medium or long term. This willful neglect will lead to shortsighted solutions that will endanger those who live near the plant. The practical reality is that the fuel will be housed at Indian Point until a long-term federal repository is constructed. Holtec does not acknowledge this and is not prepared to meaningfully engage with this possibility.



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Lastly, the PSDAR does not contemplate the full extent of remediation that the site requires. At present there are known leaks of radioactive material into the soil at Indian Point. If Holtec is not careful, the decommissioning of the plant risks exacerbating this environmental hazard. The excavation and use of heavy machinery at Indian Point could disturb the soil and expose workers and residents alike to radioactive material. True diligence is needed to ensure that remediation is done concurrently and in concert with decommissioning so that there are no unforeseen risks. By compartmentalizing decommissioning and remediation Holtec has created a convenient timeline but has not engaged with site-specific hazards that must be addressed.

The best way to ensure the safety of all involved is to have rigorous oversight performed by the NRC. A full-time resident inspector will help to ensure that the NRC is able to perform this oversight, but the inspector can monitor the safety of excavation work that endangers the pipelines and remediation of any leaks to ensure worker safety. The NRC must be the eyes and ears keeping watch, keeping the public aware of high-risk activities. Indian Point is a unique plant with a unique set of circumstances. Holtec's cookie cutter approach to decommissioning must not be allowed to put the public at risk.

The NRC must be the bulwark to ensure a safe decommissioning of Indian Point.

Sincerely,

A handwritten signature in cursive script that reads "Sandy Galef".

Sandy Galef