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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-2021-0125-0002

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

This is in regards to Holtec Intl plan for Post-Shutdown Decommissioning Activities, PSDAR, of the Indian Point nuclear reactor.

With Holtec being a for profit company, being more beholding to its owners than the general public, there needs to be stringent oversight of their decommissioning activities.

Holtec's PSDAR has very inadequate, or in some cases, or non-existent, information to key safety issues affecting the New York Metropolitan Area. These issues include:

Cask and Canister issues: The existing 20-25 year warranty on canisters and the cask system is inadequate, given the very long time that radioactive decay occurs naturally. In addition, the canisters should have pressure monitors installed to help prevent radioactive leaks and there needs to be more effective and accurate off-site radiation moderating.

Pipeline Risks: The PSDAR makes no mention of the hazards the demolition work could cause to the Algonquin high-pressure gas pipeline running under the adjacent facility. This needs to be addressed in the plan. This is a risk identified by NYS and multiple independent experts.

Transportation Of Spent Fuel: Holtec plans to ship the spent fuel via the Hudson River and land routes to interim only repositories in Texas or New Mexico. This is a very risky endeavor, especially as it involves transporting the spent fuel twice. It would be better to have onsite storage with all safety precautions available.

Inadequate Site Remediation: Holtec's PSDAR indicates that it will do nothing to remediate radiological contamination known to be leaking into the groundwater and the Hudson River, and that it will only superficially remediate contaminated soils. Holtec's PSDAR must make it clear that they will take full responsibility for total remediation of any contamination.

For the above reasons and other reasons stated in the public comments, I urge you to reject the PSDAR and insist that Holtec prepare a more complete PSDAR that address all concerns.