

# 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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## General Comment

As an impacted resident of Westchester County, NY and a concerned citizen who has engaged with the NRC at annual meetings for the past ten years, I am very concerned about the PSDAR and appreciate the opportunity to express my concerns. I have lived in Westchester for my whole life (63 years) and was a college student in central Pennsylvania who was evacuated during the Three Mile Island nuclear catastrophe in 1979.

First and foremost, Holtec has not addressed the fact that the Indian Point nuclear site has three high pressure gas pipelines running under it and they must work with FERC, PHMSA (DOT), DHS and any other agencies to immediately shut down the gas because of the risks of a pipeline rupture during decommissioning. Whenever there is construction that involves excavation, even for a small home addition, the contractor must arrange to have the gas shut off. Holtec didn't even mention the gas pipelines in the initial PSDAR and clearly there has been very little interest in working with the federal agencies to shut down the gas. We were told that Holtec will communicate with Enbridge during decommissioning, but that does not provide any comfort. The NRC's Inspector General released a report in February 2020 that demonstrated that the approval of the Enbridge AIM pipeline was based on a false assumption that the gas could be turned off in three minutes after the identification of a pipeline incident. Pipeline safety expert Richard Kuprewicz of AccuFacts said that this is not possible and it would take more than three minutes for Enbridge to identify the drop in pressure and far longer to shut down the gas. Since the approval of the pipeline was based on false information, this is an urgent matter of public safety and the gas pipelines pose an imminent threat to the entire region. The NRC must work with the other federal agencies to shut down the gas immediately.

Additional concerns:

Emergency Planning and Response: In the Joint Proposal, NYSDHSES will oversee Emergency

Management and Response, with funding provided by Holtec, starting at \$1,000,000 per reactor in 2022, decreasing when all the radioactive fuel is move to dry cask storage and then dropping to \$250,00 -- \$750,000 depending on when that transfer is completed, and to \$100,000 after Partial Site Release and as low as \$25,000 until License Termination. Although dangers resulting from failure of a reactor, steam turbines, transformer explosions or other major failures have decreased since the plant ceased operation, nearly 2,000 tons of highly radioactive fuel is stored on site and dismantling the facility poses new dangers and the need for emergency planning will continue as long as waste is stored on site. The funding schedule is clear but not the actual emergency evacuation plan for various occurrences.

Transportation: Holtec's plan says it will ship Indian Point's radioactive waste, including highly radioactive spent fuel, down the Hudson River by barge.

Barging contaminated materials down the Hudson River through NY Harbor poses a risk to river towns and the greater NYC Metropolitan area.

As the high-level nuclear waste is transported across the country, it will threaten the safety of communities along the transport routes, especially EJ populations in under-represented cities and rural areas.

A 2019 Department of Energy (DOE) Gap Analysis indicates that more needs to be understood about the impact of changing the vertical orientation used in dry cask storage to a horizontal orientation for transport, including increased temperature and possibility of degrading the cladding which hold the fuel pellets in place in the fuel rod. It recommended additional modeling, which is not being done.

The operation and decommissioning of nuclear power plants, transportation and storage of spent nuclear fuel disproportionately impacts communities of color and low income in reactor communities, such as those at and surrounding Indian Point, those transportation routes, and especially indigenous and Latinx communities at potential recipient communities in TX and NM.

Holtec's plans for off-site transport of radioactive waste, shipping Indian Point's spent fuel to New Mexico to be stored at Holtec's consolidated interim storage facility are unacceptably dangerous, and violate the principles of environmental justice and consent-based siting, as well as federal law, which prohibits interim storage before a permanent repository is sited.