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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

It is clear that Holtec's Plan ("PSDAR") does not supply adequate treatment to key safety and financial issues affecting the New York Metropolitan Area, the Hudson Valley, and beyond, including the tri-state area of New York, New Jersey, and Connecticut.

Where Holtec plans to store the waste and the containers for the waste is also of great safety concern. Holtec plans to continue to use a containment system for Spent Nuclear Fuel (SNF) of thin-walled canisters (1/2" -- 5/8") inside thicker concrete casks lined up like bowling pins on a concrete tarmac -- a configuration which is more vulnerable to terrorism than Hardened Onsite Storage (HOSS), which could be much safer and should be explored. In Europe and many other countries nuclear waste is stored in more robust canister systems (10" - 20" thick) and often in hardened buildings. really causes concern as well . Indigenous people in New Mexico are very concerned about the plans to store near their land in these thin canisters. Holtec was castigated by several in their handling of Yankee Nuclear in Vermont decommissioning, including regarding thin canisters.

My biggest concern, however, is the huge 42 inch natural gas AIM pipeline which runs under and close to the facilities to be broken down.

Indian Point is not only located at the intersection of two earthquake faults, but to add concern is this high-pressure AIM gas pipeline (plus other pipelines) running under and adjacent to the facility. No other nuclear site in the nation is so threatened by pipelines. Demolition work inherent to decommissioning elevates the hazard to a strong degree. NYS and multiple independent experts recognize the risk. However, the pipelines are not even mentioned in Holtec's PSDAR. The NRC's Office of Inspector General (OIG) harshly criticized the NRC staff for dismissing the danger of an explosion as "not credible, and instead ignoring key data and tailoring its modeling of explosion risks to fit the desired foregone conclusion that no action is necessary. All gas pipelines need to be turned off while the decommissioning is

happening, especially when explosives are being used. 20 million people and more depend on this process being done safely without future repercussions. Thank you very much.