

# PUBLIC SUBMISSION

SUNI Review  
Complete  
Template=ADM-013  
E-RIDS=ADM-03

ADD: Richard  
Guzman, Mary Neely  
Comment (4)  
Doc.0001  
Publication Date:  
6/24/2021  
Citation: 86 FR 33383

<b>As of:</b> 10/26/21 9:53 AM <b>Received:</b> October 22, 2021 <b>Status:</b> Pending_Post <b>Tracking No.</b> kv2-ppxt-mypz <b>Comments Due:</b> October 22, 2021 <b>Submission Type:</b> API
---

**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-2021-0125-0001

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

**Document:** NRC-2021-0125-DRAFT-0032

Comment on FR Doc # 2021-13474

---

## Submitter Information

**Email:** mazafratz@yahoo.com

**Organization:** Safe Energy Rights Group

---

## General Comment

I am writing to point out severe deficiencies in Holtec's PSDAR.

1- Despite the Indian Point Energy Center being crisscrossed by MULTIPLE high-pressure, fracked gas pipelines, Holtec's PSDAR does not contain the word pipeline. The NRC's Office of the Inspector General's own investigation found the safety assessment of siting the pipeline was reverse engineered to produce the desired approval. That faulty assessment did not include the risks of decommissioning and demolition activities. The PSDAR should be rejected until it properly accounts for the risks demolition activities pose to the pipelines.

2- The PSDAR does not account for the proximity of IPEC to Buchanan-Verplanck Elementary School. BV is less than 4000ft from the reactors at Indian Point. There was no independent assessment that it is safe to have students at staff so close to the plant during demolition. There was no effort by Holtec to work with the community to conduct such a safety assessment. The PSDR should be rejected until it includes results of an independent safety assessment for the elementary school.

3- The PSDAR does not address the contaminated water and soil on the IPEC property. Decommissioning activities should not be undertaken without a complete picture of how the property will be restored. The PSDAR should be rejected until it includes comprehensive planning to address soil and water contamination.

4- Holtec should not be allowed to use the Decommissioning Trust Fund for spent fuel management. That money should be reserved for decommissioning activities. The PSDAR should be rejected because it misappropriates these funds.

5- Holtec should not be allowed to cut corners by mixing standard and high burn up fuel as a means of

speeding up moving rods to dry cask. The PSDAR should not be approved without use of best practices for fuel handling.

6- The PSDAR relies upon changes to Federal Law allowing Holtec to transport fuel to a central interim storage facility. The community that would host the proposed CIS facility does not want it. The state that would host the CIS facility does not want it. It is not feasible to even transport the irradiated spent fuel. The PSDAR should be rejected because it is not feasible. Unless or until CIS is approved and the proposed host communities consent to becoming a waste dump, the PSDAR should be rejected. As a resident living 1 mile from the plant, I do not support dumping our waste on another Environmental justice community. An alternative plan with hardened on-site storage should be made that accounts for sea level rise at Indian Point.

7- As usual, the NRC refuses to actually HEAR and respect the wishes of host communities. Until the community input is respected and incorporated into the PSDAR is should be rejected.

Courtney M. Williams, PhD  
Co-founder  
Safe Energy Rights Group