

From: [Riverkeeper](#) on behalf of [Joel Gingold](#)
To: [RulemakingComments Resource](#)
Subject: [External_Sender] Comments on NRC's Draft Decommissioning Rule (Docket ID: NRC-2015-0070)
Date: Saturday, August 27, 2022 1:27:48 PM

Aug 27, 2022

Secretary U.S. Nuclear Regulatory Commission Rulemakings and
Adjudications Staff
Washington, DC 20555-0001

Dear: Secretary Rulemakings and Adjudications Staff,

To the NRC,

I live within a few miles of the Indian Point Nuclear Plant, currently being decommissioned by Holtec, a company with a sordid history of technical, administrative, and ethical infractions. I am also a retired professional nuclear engineer with nearly sixty years' experience in commercial nuclear power.

As are many of my colleagues, I am unalterably opposed to further relaxation of the NRC's regulations affecting the decommissioning process. Rather, those regulations, and NRC oversight of such projects, should be strengthened and expanded. This is of especial concern with respect to Holtec, as the company, which has never in the past successfully carried out a large plant decommissioning, is currently attempting to decommission four or five such units simultaneously, while at the same time seeking to significantly expand its operations, a recipe for potential disaster, as the management's attention will be too thinly spread over all of these projects to effectively control them.

For years, the NRC has significantly reduced its oversight, placing the residents of the area around decommissioning nuclear plants, such as Indian Point, at increased risk. As Senator Edward Markey of Massachusetts has stated repeatedly, this trend must be reversed.

Yet over the past several years, the NRC has continually ratcheted down its control over the decommissioning process and assigned more and more of the responsibility for such safety issues to the contractor performing the work. The past and proposed modifications to applicable regulations have only exacerbated this problem, leaving us, the neighbors of the plant, significantly less protected than before. This is of special concern at Indian Point due to the proximity of the natural gas pipeline and the lack of a rail spur at the site, necessitating shipment of radioactive waste and irradiated components by truck and barge.

To compound the problem, the financial terms of the plant's sale to Holtec increase Holtec's profits if it can perform the work more rapidly and at lower cost. Exactly the wrong incentive for safety and one that can encourage Holtec to cut corners where it can. Only effective NRC oversight and regulation can assuage these concerns.

So stop, and reverse, the continued erosion of NRC regulations and control. Perform your statutory duty to effectively protect the public! I know whereof I speak and, along with my neighbors, have become increasingly concerned with the potential impact of the Indian Point decommissioning. Just do your job and we'll all be better off for that.

Sincerely,

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