

**From:** [Sabatini Monatesti](#)  
**To:** [Docket, Hearing](#)  
**Cc:** [Docket, Hearing](#); [OCAAMAIL Resource](#); [Docket, Hearing](#); [Roy Hawkens](#); [david.lewis@pillsburylaw.com](#); [Mizuno, Beth](#); [Scott, Catherine](#); [Wachutka, Jeremy](#); [OGCMailCenter Resource](#); [Speiser, Herald](#); [Julian, Emile](#); [Newell, Brian](#); [Sola, Clara](#); [erik\\_helbing\\_esq@yahoo.com](#); [susan.schwartz@pressenterprise.net](#); [marande07@aol.com](#); [Vincent.kundrik@mail.house.gov](#)  
**Subject:** [External\_Sender] Re: Re: \*\*\* Susquehanna - Challenge to Access to SUNSI Denial \*\*\* Time-sensitive information included  
**Date:** Monday, October 24, 2016 2:51:31 PM  
**Importance:** High

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Herald Speiser

Per the Morning Call, Scott Kraus, and per documents filed with the Security and Exchange Commission, Riverstone said its post merger "operational strategy" for Talen includes a focus on increasing cash flow (no longer a public utility, so one must assume, Riverstone will increase cost per kilowatt unit, driving up delivery cost to consumer, without constraint or oversight by public utility commission), reducing "plant-level costs" (does this include the reduction of security, maintenance and capital improvements, if so how will these actions affect health and safety), "corporate overhead" (usually requires reduced administration and job positions, as well as shut down of non-operational facilities, e.g., park area next to Susquehanna River), Non-critical activities (does this include training facilities, software and hardware upgrades, forcing remain in place technology), and evaluation of the sale of "certain non-core assets" including liquidity and reduced debt (Outstanding debt is significant, Talen secured term loan of \$250 million, plus an outstanding unsecured debt of \$3.3 billion).

I plan to review Talen Energy and Riverstone 10K reports. I will need additional time for this review. It will be very interesting to discern how Riverstone will cut operating expenditures by \$100 million per year, reduce capital expenditures by another \$50 million and in so doing erase the \$340 million shortfall reported by Talen Energy. I understand Talen reported total operating expenses of \$1.5 billion for the first six months of 2016. These numbers need further review, and until the impact of this deal to the citizen is understood, this license transfer should be scrutinized in detail and tabled until citizen review is completed.

Regards,  
Sabatini Monatesti

Update to previous post.

Sabatini Monatesti

Oct 24, 2016 12:46:48 PM, smonatesti@verizon.net wrote:

Herald Speiser;

Thank you for your prompt response to my request, i.e., challenge to adverse determination. I attached the signed Certificate of Service requesting the challenge.

As you know, I raised concerns regarding Susquehanna, April 19, 2016. I believe these concerns are still valid. I again reviewed these concerns in my draft letter May 18, 2016, reference attached.

The difficulty I have with the transfer of license process, i.e., from PPL, to Talen Energy, to Riverstone, is this; At no time along the license transfer path, to my knowledge, has a public hearing occurred within the 10 mile Plume Exposure Zone, nor in the 50 mile Ingestion Pathway Zone, i.e., Notification per Act. Further, during this process Talen Energy posted a loss of \$341 Million. The revenue stream for nuclear is under severe strain, energy prices are going down, maintenance costs are increasing, health and safety issues continue to plague many facilities (10 out of 100 facilities are out of service regularly further increasing the cost per unit of a generated kilowatt hour, note Susquehanna outage performance), plans for on site storage at Susquehanna, i.e., on site two miles from my home, plan to go beyond the 1,900 metric ton limit, and I do not believe the decommissioning dollars allotted are adequate, i.e., given estimated \$13 to \$19 million per facility and 100 units to decommission over the next 20 years, using an inflation rate of 3% over 20 years and decommission dollar value for one site @ \$15 million, my estimate: \$2,630,259,079.62 and we have two units up the road.

Further, given that Riverstone could go bankrupt during the near future, the question raised is this: Who is left with the cost of cleaning up what is left? We have a superfund site down the road off old route 11, and we still have scars left over from coal mining, reference McAdoo, PA. Who will be the guarantor given potential failure? Will burden fall on the citizen? Without access to the Riverstone operating plan, investment NPV calculation, and clear recognition and resolution of the issues raised above, along with known dollar values for continued operation, the citizen is left with a lack of understanding, information, and lack of trust as to the veracity of the proposed transfer.

References used: <https://www.iaea.org/textbase/npsun/wei2016sum.pdf> and Nuclear Energy Institute, Fact Sheet, Decommissioning Nuclear Power Plants, August 2016

Sabatini Monatesti

Oct 24, 2016 11:08:31 AM, Hearing.Docket@nrc.gov wrote:

Mr. Monatesti,

Tanya Hood of the NRC Staff has shared with the Office of the Secretary your email stating that you would like to challenge the Staff's denial of your request for access to SUNSI. Please be advised that your email to Ms. Hood **does not** constitute a challenge to Staff's adverse determination of your request. As stated in the Federal Register Notice related to the subject of your request, a copy of which is attached, any such challenge must be submitted **within 5 days of receipt of the adverse determination** to the presiding officer in the proceeding or, if no presiding officer has been appointed, the Chief Administrative Judge. No presiding officer has been appointed in this matter, so any challenge you wish to submit must go to Chief Administrative Judge E. Roy Hawkens. Judge

Hawkens' contact information was shown on the draft certificate of service you were previously provided, another copy of which is also attached for your convenience. Please be sure to copy all parties listed in the certificate of service on anything you submit.

Thank you.

Herald Speiser

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*Herald M. Speiser*

*Rulemakings and Adjudications Staff*

*Office of the Secretary*

*U. S. Nuclear Regulatory Commission*

*(301) 415-1675*

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