

From: [Henrietta Cosentino](#)
To: [Docket Hearing](#)
Subject: [External_Sender] Docket ID NRC-2018-0279
Date: Tuesday, February 26, 2019 11:04:05 PM

Neither Entergy's plan nor Holtec's plan is acceptable in present form. Entergy's "SAFSTOR" plan to defer full decommissioning until 2060 puts our community at serious risk: (1) fuel rods would stay in the fuel pool for a long time, prolonging the risk of exposure to extreme weather, terrorism etc. (2) Recent reevaluations of the nature and degree of climate change have been largely ignored in Entergy's risk projections; nor does it enter into the NRC's calculations. Given extreme rains, storm surges and rising seas, Pilgrim's reactor is likely to be seriously water-compromised by 2060 (3) By 2060, all those now involved in the NRC, Entergy, the NDCAP and the federal government itself will be gone! How can we have any confidence that the basics of safety will be transmitted, understood and carried out between now and 2060? **Holtec's proposed six-year process also arouses serious concerns**, best expressed by our AGO at the NRC's annual meeting in January: "From the Attorney General's point of view, the proposed sale and the related transfer of license from Entergy to a Holtec subsidiary raise significant health, safety, environmental and financial concerns for the Commonwealth and its citizens. [...] Because of the significant risks to the Commonwealth ... we implore the NRC to join us in closely scrutinizing the proposal's terms and ensure that substantial financial assurances exist to ensure those risks are fully addressed." A rapid decommissioning is preferable to a deferred one, but only if it doesn't leave the site polluted and put the population at risk. There is reason to believe that Holtec is not prepared to spend the amount of money it will actually take to decommission the site properly. It is clear that there are many incentives to cut corners at public expense. Moreover Holtec's HI-STORM dry casks are a source of concern. They are warrantied for only 25 years, but they are expected to contain material that will be toxic for 250,000 years. How is this acceptable? Their thin walled are already scratched in San Onofre and elsewhere. If leaks are discovered, the casks cannot be repaired—only covered up with a larger cask. What happens when they all leak? In reviewing both plans, we count on the NRC to ensure the health and welfare of the Commonwealth and its citizens.