



Empowering Communities to Power the Future

Courtney M. Williams, PhD
Safe Energy Rights Group, Inc.

Peekskill, NY 10566
February 10, 2020

US Nuclear Regulatory Commission
By Electronic Transmission:
Hearing.Docket@nrc.gov
Washington, DC 20555-0001

RE: Request for Hearing on Indian Point License Transfer, NRC-2020-0021

To Whom It May Concern:

I am writing on behalf of Safe Energy Rights Group, Inc. (SENRG) and the 20 million people living and working within the 50 mile radius around Indian Point Nuclear Power Plant to request an adjudicatory hearing regarding the application for license transfer to Holtec.

The communities around Indian Point and others in the region, have grave concerns about Holtec's ability to successfully complete the decommissioning of Indian Point Units 1, 2, and 3.

The Post-Shut Down Decommissioning Activities Report (PSDAR) filed by Holtec Decommissioning International, LLC ("HDI") was woefully inadequate:

- It failed to include a single mention of the "Algonquin" Pipeline system that runs under Indian Point Energy Center, including one pipeline that runs 400 feet from the control room. New York State conducted a risk assessment of the co-location of these pipelines with Indian Point and identified decommissioning activities as posing an increased risk of rupture and fire. That Holtec was seemingly unaware of these pipelines and did not include a plan to address the increased risk is unacceptable.
- It failed to include a plan to remediate the significant amount of radioactive water already beneath the site and currently being monitored by wells around the Indian Point property. The presence of old water mains under the site and the leaks from the spent fuel pools are likely to be exacerbated by the use of heavy equipment to deconstruct the reactors and other structures.
- HDI set up a series of "shell" companies to own and manage the decommissioning process. None of these companies appear to have any 'seed capital' or any guarantees on the part of HDI that would ensure their ability to complete this project.
- Because the 'shell' companies lack capital, Holtec has requested an exemption to use the Decommissioning Trust Fund to pay for waste handling. It plans to then request reimbursement from the Treasury for those expenses – which amounts to double payment for activities that are not even among the allowed 'decommissioning activities' under the applicable Federal legislation.

Our community and our elected officials share these concerns. We therefore request an adjudicatory hearing regarding the application for license transfer.

Sincerely,

Courtney M. Williams, PhD
Cofounder, Safe Energy Rights Group, Inc.