

From: [Robyn Ruina](#)
To: [Docket Hearing](#)
Subject: [External_Sender] Indian Point Decommissioning
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Attachments: [Comments on Indian Point Decommissioning Transfer.docx](#)

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

To Whom it May Concern,

I live within three miles of Indian Point and have serious concerns about Holtec's decommissioning plan. The company has never decommissioned a large nuclear power plant. The potential risks posed are huge and should only rely on successful past performance as more than 21 million people live in the surrounding area. Community members and professionals in the field also have voiced concerns. I am asking that the NRC deny the application for the transfer of ownership of Indian Point Energy Center.

I also request that the NRC hold a public meeting to answer some of the many technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec. Many community residents are unaware of the transfer plans.

Holtec does not have a strong track record. At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

It is unclear that Holtec employs sufficient qualified senior staff to supervise simultaneous efforts to decommission Indian Point as well as other plants around the country, much less the large number of specially trained technical workers whose services will be required. The work can only be safely performed by skilled and experienced specialists. Additionally, the work will be more complicated than at other reactors because there is no rail spur at Indian Point.

Furthermore, Holtec's business ethics have been questioned. Their history indicates a proven track record of dishonesty and corruption. There was bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, and misrepresentations in its application for tax benefits in New Jersey.

There are also serious financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion; however, in every nuclear plant decommissioning unanticipated situations increase costs. Therefore an accurate cost of the project cannot be determined.

The Indian Point decommissioning fund contains approximately \$2.1 billion. Holtec asserts that investment earnings from the fund will make up the difference. There is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. If funds are inadequate and CDI files for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Therefore, if the NRC approves the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The financial arrangements also offer unsuitable incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. There is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by the NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I believe there will be serious consequences for residents of the lower Hudson Valley and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely yours,

Robyn L. Ruina