

As of: 2/21/20 6:24 AM Received: February 20, 2020 Status: Pending_Post Tracking No. 1k4-9f4l-ip6l Comments Due: February 24, 2020 Submission Type: API
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PUBLIC SUBMISSION

Docket: NRC-2020-0021

Indian Point Nuclear Generating Unit Nos. 1, 2, and 3; Transfer of Control of Licenses and Approval of Conforming License Amendments

Comment On: NRC-2020-0021-0001

Indian Point Nuclear Generating Unit Nos. 1, 2, and 3; Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments

Document: NRC-2020-0021-DRAFT-0036

Comment on FR Doc # 2020-00824

Submitter Information

Name: Don Hawkins

Address:

1406 Grant St.

North Braddock, PA, 15104-2948

Email: hawk6977@yahoo.com

Organization: self

General Comment

I am against the Holtec takeover of Indian Point. The company has a less than stellar record, and is only interested in the money, not in actually doing a controlled, managed shut down of the facility. The problem with very stupid people is you cannot convince them of how stupid they are.

The facility is too close to NYC to risk an accident.

A cursory overview shows that the Report fails to fulfill its basic objectives. A few of its main flaws are:

A full site characterization has not been completed, casting doubt on the entire report. Holtec cannot accurately gauge the cost of its activities when it does not know what needs to be done.

No mention the Algonquin Pipeline, only 105 feet from critical safety infrastructure, next to two major fault lines. Holtec cannot begin to take the necessary precautions to minimize the risk of potential pipeline explosions during the decommissioning process.

Large components may be removed by barge to be loaded onto rail. The details are incredibly lacking,

including safety precautions, means and methods.

4. Holtec makes no mention of addressing the known radioactive groundwater contamination on-site, potentially contaminating the Hudson. Further, Holtec apparently does not intend to restore the site for future uses.

The PSDAR clearly shows Holtec's real intent to drain the decommissioning trust fund whether or not it actually accomplishes decommissioning. Holtec anticipates getting exemptions for non-decommissioning purposes, such as spent fuel management and site restoration. This not only diverts funds away from the intended purpose, but also allows Holtec to pocket any reimbursement for spent fuel management it recovers later from the Department of Energy. Holtec limits its own risk if funding runs out through the use of limited liability subsidiaries with no assets, which would make it nearly impossible to collect shortfalls from Holtec.

Holtec has everything to gain and nothing to lose, by shifting all risk onto the public. Don't let this plan become reality. I urge you to reject this unacceptable PSDAR.