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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

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Comment on FR Doc # 2020-00824

Submitter Information

Name: Bruce Esrig

Address:

Madison, NJ,

General Comment

Decommissioning of the Indian Point power plant infrastructure requires costly maintenance of structures, land, utilities, and access. Any fuel stored on site would have to be cared for indefinitely.

These costs must be accounted for, either through a source of income or through an annuity that can be relied upon not to run out. As a graduate of a math program at a prestigious institution, and one who has worked on calculation software for the financial industry, I recommend in favor of relying upon an organization that has ongoing income to protect against financial accidents that could leave no means of sustaining the required immediate costs of decommissioning and any ongoing costs of maintenance.

If Entergy is seeking to transfer responsibility to Holtec, the application should be required to demonstrate a robust accompanying endowment based on income-generating services (preferably) or capital (in quantities that permit the revenues from highly conservative investment to sustain both initial and ongoing expenses).

In addition, the application should not be approved until the responsible organization (Holtec or a component of Holtec) is demonstrated to be transparent and accountable. The government has a fiduciary responsibility to the present and future public to ensure that any trust placed in Holtec is not betrayed.

In the case of nuclear material, this responsibility cannot be discharged lightly. A real demonstration of capacity to deliver over the long term must be required. Nuclear materials are harmful to people because the

decay of nuclear materials damages DNA. This damage can harm the exposed individual and be propagated to their descendants. We are not yet at the point of being able to repair hereditary DNA damage at scale, so it would be unwise to increase the risk that the public will be exposed to nuclear materials as a result of neglect in decommissioning or subsequent maintenance.

For these reasons, the proposal to transfer responsibility for decommissioning to Holtec should be rejected until adequate safeguards, as described here and by other prudent commenters, can be found trustworthy and instituted.