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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-0067

Comment on FR Doc # 2020-00824

Submitter Information

Name: Anne Scheinberg

General Comment

I am writing in response to this notice:

The application seeks NRC approval of the transfer of control of Provisional Operating License No. DPR-5 and Renewed Facility Operating License Nos. DPR-26 and DPR-64 for Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3, respectively (referred to individually as IP1, IP2, or IP3, and collectively as the Indian Point Energy Center or IPEC), as well as the general license for the IPEC Independent Spent Fuel Storage Installation (ISFSI) (collectively, the licenses).

Specifically, the application requests that the NRC consent to (1) the transfer of control of the licenses to Holtec subsidiaries to be known as Holtec Indian Point 2, LLC (Holtec IP2) and Holtec Indian Point 3, LLC (Holtec IP3) and (2) the transfer of ENOI's operating authority to HDI. The NRC is also considering amending the licenses for administrative purposes to reflect the proposed transfer. The application contains sensitive unclassified non-safeguards information (SUNSI).

I would like to register my strong disagreement. I ask the Nuclear Regulatory Commission to DENY the request of control of Provisional Operating License No. DPR-5 and Renewed Facility Operating License Nos. DPR-26 and DPR-64 for Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3, respectively (referred to individually as IP1, IP2, or IP3, and collectively as the Indian Point Energy Center or IPEC).

I ask the Nuclear Regulatory Commission to DENY the transfer of control of the general license for the IPEC

Independent Spent Fuel Storage Installation (ISFSI).

Specifically, I am requesting the NRC TO DENY t(1) the transfer of control of the licenses to Holtec subsidiaries to be known as Holtec Indian Point 2, LLC (Holtec IP2) and Holtec Indian Point 3, LLC (Holtec IP3) and (2) and to DENY the transfer of ENOI's operating authority to HDI. I DO NOT SUPPORT THE POSSIBILITY THAT THE NRC consider amending the licenses for administrative purposes to reflect the proposed transfer.

The licenses for Indian Point are based on the accountability anchored in public processes and public utility ownership. Privatising the obligations and removing the operations from public oversight and public-sector administrative and political responsibility is much too dangerous. What prevents Holtec from declaring bankruptcy and abandoning the project half-way? How does anyone know enough about what this costs, to know the depth of Holtec's financial obligations? Who is liable if they fail?

What insurance company will insure this process and become liable if Holtec goes bankrupt in the process? Who will pay for clean-up and restoration if this privatised obligation fails?

Thank-you for your consideration and attention to these objections and thank-you in advance for DENYING ALL PERMISSIONS FOR TRANSFER in this case.

Nuclear safety was already considered to