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

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

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.

Despite the fact that Holtec has never decommissioned a large nuclear power plant, it now proposes to perform several such decommissioning operations simultaneously, including, not only Indian Point, but also Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in

decommissioning are too great to rely on other than successful performance in an initial project before authorizing additional endeavors.

It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But



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. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve 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 intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, 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 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 fear there will be grave consequences for residents living along 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.

Indian Point, located along the flyway of the 9/11 flight, 40 miles from Manhattan, on the banks of the historic scenic Hudson River (commerce, recreation and fisheries); underserved by a highway and roadway system that defies <sup>timely</sup> evacuation. This Indian Point decommissioning cannot be, must not be, a failure. You must insure that this is done right.

Sincerely, Douglas Wehle