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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-0097

Comment on FR Doc # 2020-00824

Submitter Information

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General Comment

a public meeting/hearing
for license transfer needs to be held in Westchester.

We are involved citizens and are entitled to this
information.

Holtec has a criminal record and should not be
allowed to do business in New York. They manufacture
the casks they want to use for high level radioactive
waste storage. They have thin walls and are inferior
to thicker walled casks used abroad. Quick and cheap
is how they have done business. There is no reason
to think it will be any different at Indian Point.

Decommissioning Indian Point is not business as
usual. It is the long term health and safety of the

Hudson River Valley and the lives of 20 million people who live and work in the area surrounding the reactors.

Not only is NYC in the 50 mile radius blast zone for Indian Point, and any disturbance could also affect the high-pressure natural gas pipeline that lies 105 feet from the nuclear facility and runs under the Hudson river.

We know the NRC is aware of the shoddy practices and materials used by Holtec. See this article:

11/29/2018: NRC admits San Onofre Holtec nuclear waste canisters are all damaged

Posted on November 29, 2018 by Donna Gilmore

The Holtec nuclear waste storage canisters at San Onofre are lemons and must be replaced with thick-wall casks.

Lemons

11/29/2018 Oceanside: The Nuclear Regulatory Commission (NRC) admits in their November 28, 2018 NRC Inspection Report and Notice of Violation, ML18332A357 (page 8 and 9) every Holtec canister downloaded into the storage holes is damaged due to inadequate clearance between the canister and the divider shell in the storage hole (vault). The NRC states canister walls are already "worn". This results in cracks. Once cracks start, they continue to grow through the wall.

Please set a hearing for the public to understand and comment on this project.

Thank you,
Kathleen Thomas
Concerned Citizen

Attachments

San Onofre defective Holtec nuclear waste storage

← San Onofre defective Holtec nuclear waste storage system is a lemon and must be recalled

NRC ignores Holtec design problem that gouges walls of all San Onofre nuclear waste canisters →

11/29/2018: NRC admits San Onofre Holtec nuclear waste canisters are all damaged

Posted on [November 29, 2018](#) by [Donna Gilmore](#)

The Holtec nuclear waste storage canisters at San Onofre are lemons and must be replaced with thick-wall casks.



11/29/2018 *Oceanside*: The Nuclear Regulatory Commission (NRC) admits in their [November 28, 2018 NRC Inspection Report and Notice of Violation, ML18332A357 \(page 8 and 9\)](#) every Holtec canister downloaded into the storage holes is damaged due to inadequate clearance between the canister and the [divider shell in the storage hole \(vault\)](#). The NRC states canister walls are already “worn”. This results in cracks. Once cracks start, they continue to grow through the wall. The NRC stated Southern California Edison (and Holtec) knew about this since January 2018, but continued to load 29 canisters anyway. [Edison’s August 24, 2018 press release states they plan to finish loading mid 2019.](#)

The NRC states Edison must stop loading canisters until this issue is resolved. However, there is no method to inspect or repair cracking canisters and the NRC knows this.

Instead, the NRC should admit the Holtec system is a lemon — a significant defective engineering design — and revoke both San Onofre and Holtec dry storage system licenses.

The NRC should require all San Onofre thin-wall canisters be replaced with thick-wall transportable storage casks. These are the only proven dry storage systems that can be inspected, maintained, repaired and monitored in a manner to prevent major radiological releases and explosions.

California state agencies should revoke San Onofre permits and withhold Decommissioning Trust Funds until these issues are resolved.

The Navy should consider revoking the San Onofre Camp Pendleton lease until Edison agrees to replace thin-wall canisters with proven thick-wall transportable storage casks. This is a national security issue. If the NRC cannot do their job, maybe it's time to bring in the Marines. The Navy has nuclear experts.

Sign petition to recall and replace San Onofre defective thin-wall canisters with proven thick-wall casks



Attend November 29th SONGS Community Engagement Panel meeting. Tell the NRC and Edison:

The Holtec thin canister system is a lemon and must be replaced. Demand they replace all thin-wall canisters with proven thick-wall casks before it's too late. Ratepayers didn't pay for lemons.

- QLN Conference Center, 1938 Avenida Del Oro, Oceanside, CA 92056
- November 29, 2018 5:30 PM – 8:30 PM

- More meeting details at [songscommunity.com website](http://songscommunity.com)

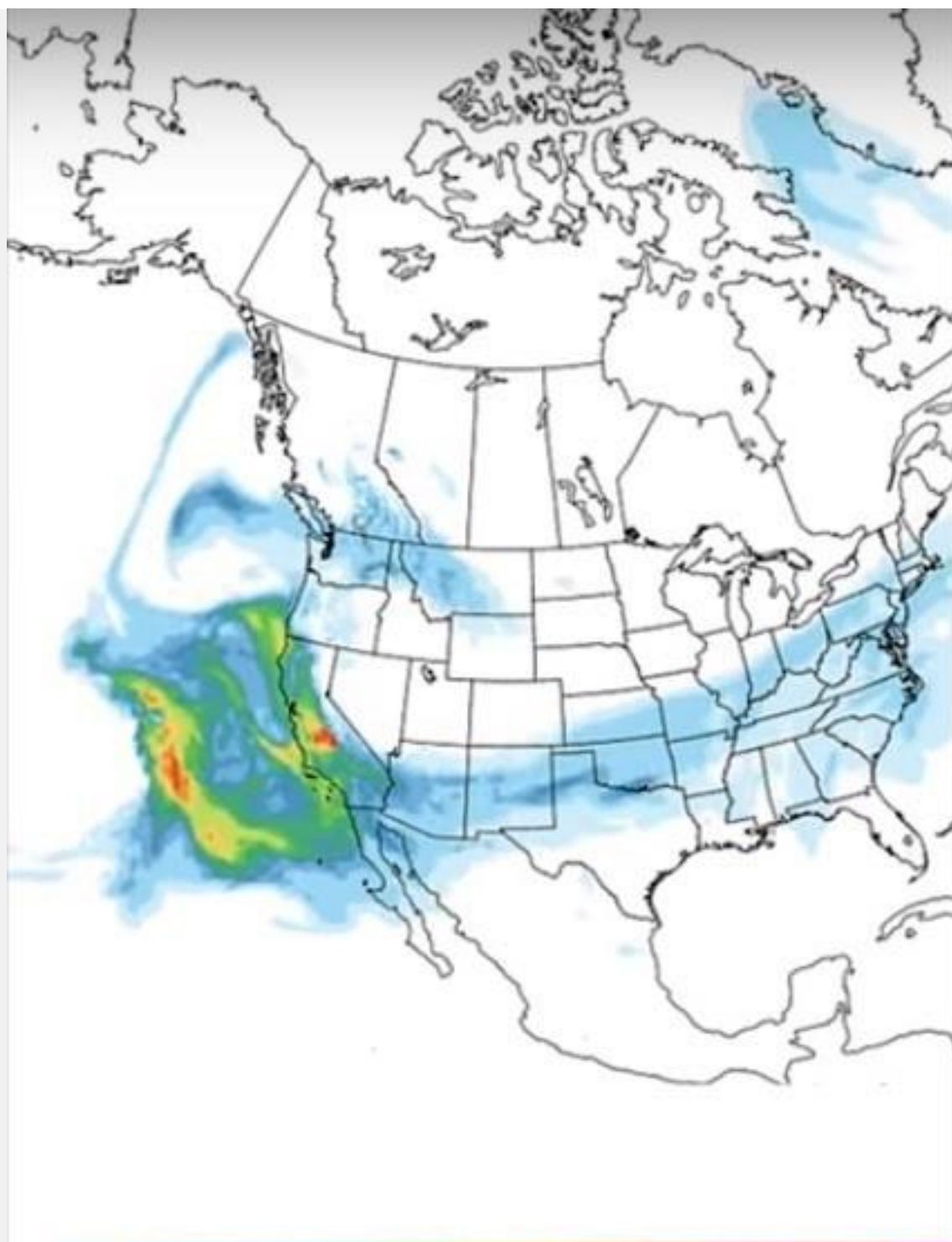
The San Onofre beachside nuclear waste storage systems are defective and must be replaced to prevent nuclear disaster in Southern California and beyond. This and the other thin-wall canister storage system at San Onofre pose a clear and imminent danger to the health and lives of the citizens, and pose potential financial, security and ecological disaster for the state of California, and beyond. **State and federal elected officials and commissioners need to take immediate action to ensure Southern California Edison:**

1. **STOPS** loading highly radioactive fuel waste into the defective Holtec storage system and **REJECTS** Holtec nuclear storage system. It's a lemon and cannot be fixed with procedures and training.
2. **REPACKAGES** all San Onofre nuclear fuel waste into proven maintainable thick-wall transportable storage casks in order to avoid major radiological disasters in Southern California.
3. **MOVES** the new thick-wall casks to higher ground, away from coastal flood hazards, and stores them in reinforced buildings.

Step 2 must be done **BEFORE** Step 3.

The current storage system puts the public at risk. Nuclear waste stored in thin-wall steel canisters (only 5/8" thick) cannot be inspected, repaired or safely transported. Thin-wall canisters crack, but technology does not exist to inspect for cracks or repair cracks once canisters are filled with highly radioactive nuclear fuel waste.

The [President of Holtec has stated a through-wall crack will release millions of curies of radionuclides and it's not practical to repair them, even if you could find the cracks.](#)



NOAA

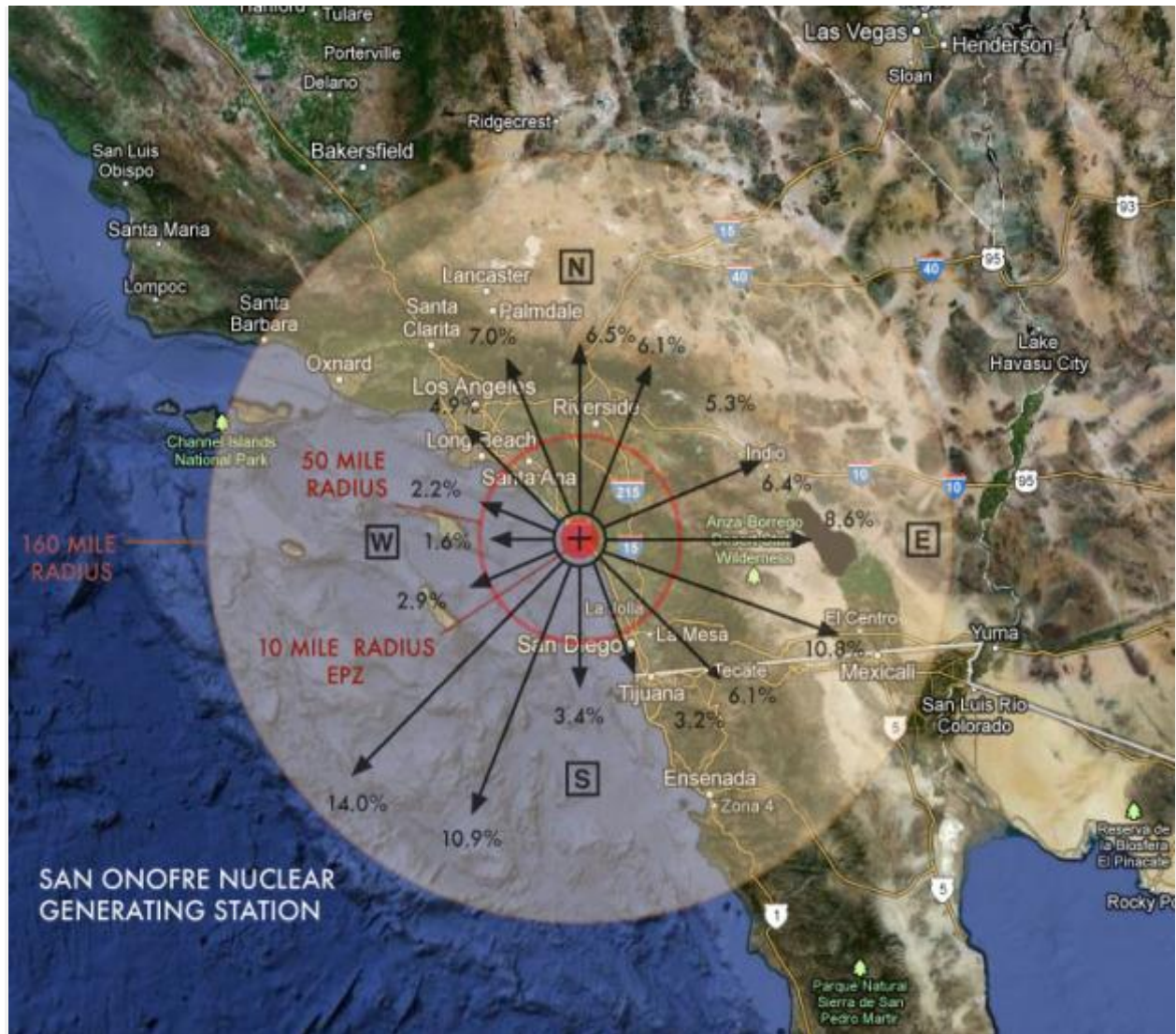
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Camp Fire smoke spread with the wind across the country. Radioactive particles will do the same, but are invisible.

Yet, they have no plan in place to stop or contain a cracking, radiation-leaking, and potentially exploding canister.

Each canister contains roughly a Chernobyl nuclear disaster. Once canisters explode, the radionuclides will travel with the wind, similar to how smoke traveled with the California Camp Fire.

[NOAA Camp Fire Map Video.](#)



San Onofre Wind Rose Chart (wind directions – annual frequency). Source data: San Diego Nuclear Power Plant Emergency Response Plan 2011 Draft

SanOnofreSafety.org

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