

From: [ROVEDO](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] a public meeting for Indian Point's license transfer MUST be held , NRC-2020-0021
Date: Monday, February 17, 2020 5:32:48 PM

To Whom It May Concern:

I am writing as a concerned citizen. I worry about the 20 million people living and working within the 50 mile radius around the Indian Point Nuclear Power Plant. I want to request an adjudicatory hearing regarding the application for Indian Point's license transfer.

The community around Indian Point and others in the region, have grave concerns about Holtec's ability to successfully complete the decommissioning of Indian Point Units 1, 2, and 3.

The Post-Shut Down Decommissioning Activities Report (PSDAR) filed by Holtec Decommissioning International, LLC ("HDI") was woefully inadequate:

- It failed to include a single mention of the "Algonquin" Pipeline system that runs under Indian Point Energy Center, including one pipeline that runs 400 feet from the control room. New York State conducted a risk assessment of the co-location of these pipelines with Indian Point and identified decommissioning activities as posing an increased risk of rupture and fire. That Holtec was seemingly unaware of these pipelines and did not include a plan to address the increased risk is unacceptable.

- It failed to include a plan to remediate the significant amount of radioactive water already beneath the site and currently being monitored by wells around the Indian Point property. The presence of old water mains under the site and the leaks from the spent fuel pools are likely to be exacerbated by the use of heavy equipment to deconstruct the reactors and other structures.

- HDI set up a series of "shell" companies to own and manage the decommissioning process. None of these companies appear to have any 'seed capital' or any guarantees on the part of HDI that would ensure their ability to complete this project.

- Because the 'shell' companies lack capital, Holtec has requested an exemption to use the Decommissioning Trust Fund to pay for waste handling. It plans to then request reimbursement from the Treasury for those expenses – which amounts to double payment for activities that are not even among the allowed 'decommissioning activities' under the applicable Federal legislation.

Moreover, I am most concerned about the lawless record of Holtec - the company Entergy has chosen to sell to for decommissioning the plant. They are currently in legal trouble in New Jersey for bribery of local officials. They have been banned from doing business with the World Bank for 10 years and have walked out on

decommissioning sites in other countries. A representative of the company made a presentation to citizens and not one person left the room feeling confident of the ability of this company to handle the decommissioning of Indian Point in a safe and secure manner. There were too many items left out - like the lake of radioactive water under the site or detailed information about the thin walled Holtec casks that are having so much difficulty at other reactor sites. Their written report was no better. The gas pipeline that runs so near the spent fuel pools was not even mentioned as something they would have to remediate. The fact that they submitted a PSDAR prior to procuring the license says volumes about their regard for and knowledge of regulations.

Our community and our elected officials share these concerns. We therefore request an adjudicatory hearing regarding the application.

Sincerely,

Nivo Rovedo