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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

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## General Comment

Holtec is a poor choice for dismantling and remediating Indian Point and safeguarding its radioactive waste, and it's already telegraphing it will do a bad job. Among Holtec's many disqualifying problems:

Holtec lacks experience in nuclear plant decommissioning.

Holtec's record is full of malfeasance bribery, fraud, getting barred from doing business with entities like the TVA and the World Bank, lying to public officials, risk-taking, dangerous incompetence and contempt for public concern or input.

Holtec's complex subsidiary structure of siloed, undercapitalized LLCs shields it from liability and accountability. Its side businesses pose serious conflicts of interest.

Holtec is privately held and secretive about its finances. It hasn't demonstrated the capitalization required to complete the estimated \$1.3 billion decommissioning, as opposed to walking away and sticking taxpayers with the consequences and costs. Its business model is about using the ratepayer financed decommissioning trust fund and taxpayer money to maximize its profits.

In a premature and improper report filed with the NRC about its plans, Holtec lowballed its decommissioning cost estimate, even though there isn't even an assessment of site conditions to base an estimate on. The company ignored the Algonquin gas pipeline passing near Indian Point's critical components, even though that complicates decommissioning and raises risks of rupture and fire. It plans to do nothing about radioactive contamination of groundwater. It won't remediate contaminated soil at the site any deeper than 3 feet. It stated it is considering shipping radioactive wastes by barge down the Hudson, raising a host of unacceptable risks.