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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-2020-0021-0002

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

Thank you for the opportunity to comment on this notice.

Holtec and its subsidiaries are privately held and their finances are opaque. Their business model is based on maximally leveraging the decommissioning trust fund and taxpayer moneys for their profit, but they haven't demonstrated sufficient capitalization to complete decommissioning, especially if decommissioning costs exceed their unreliably low estimates.

Holtec's complex subsidiary structure of separate, undercapitalized LLCs shields it from liability and accountability. At the same time, its side businesses, including building small modular reactors (SMRs) and a "consolidated interim storage" (CIS) site for nuclear waste in New Mexico, pose unacceptable conflicts of interest which its compartmentalized subsidiary structure does not remedy. These side businesses create perverse incentives for Holtec, for example to ship radioactive waste from Indian Point to its own CIS facilities, or eventually to use Indian Point's waste or even its site to benefit Holtec's SMR business, even if such choices run counter to the public interest and public safety.

For these reasons the Commission must not approve the license transfer.