

From: [Ellen Weininger](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] re: Docket ID NRC-2020-0021 Opposing Indian Point license transfer to Holtec
Date: Tuesday, March 24, 2020 4:40:18 PM
Attachments: [Comment to NRC re transfer to Holtec March 2020.pdf](#)

Re: Docket ID NRC-2020-0021 Opposing Indian Point license transfer to Holtec

To the U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff,

Please accept the attached comments from Grassroots Environmental Education

Sincerely,

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March 25, 2020

Via Email to: Hearing.Docket@nrc.gov

Re: Docket ID NRC-2020-0021 – Opposing Indian Point license transfer to Holtec

To the U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff:

Thank you for the opportunity to comment.

Grassroots Environmental Education, an environmental health nonprofit, is opposed to Entergy's transfer of the Indian Point Energy Center license to Holtec. Holtec has a well documented history of bribery, corruption and lax oversight. It is clear that Holtec and its subsidiaries are not at all qualified to hold these licenses and The Commission should reject the license transfer. Myriad problems besiege Holtec, which outright disqualify the company as a licensee.

Holtec lacks decommissioning experience and its record of bribery, fraud and other malfeasance has led to its disbarment from conducting business with the Tennessee Valley Authority and the World Bank. The company's complex subsidiary structure of undercapitalized LLCs protect it from liability and accountability while its other businesses pose serious conflicts of interest. Holtec has not demonstrated that it has sufficient funds to complete the estimated \$1.3 billion decommissioning as opposed to walking away and leaving taxpayers on the hook for all the costs and consequences. Using the ratepayer financed decommissioning trust fund and other taxpayer monies will simply maximize the company's profits without prioritizing public interests and safety.

Furthermore, Holtec's premature and improper Post Shutdown Decommissioning Activities Report (PSDAR) filed with the NRC about its plans lowballed its decommissioning cost estimate even in the absence of a site assessment of conditions with which to base an estimate. Holtec's PSDAR fails to mention the Algonquin pipelines, radioactive leaks and other critical issues. The high pressure Algonquin gas transmission pipelines sited in close proximity to critical infrastructure at Indian Point pose numerous unresolved risks including excavation operations during decommissioning, which would jeopardize pipeline integrity. Risk of pipeline ruptures and spent fuel pool fires are not considered. Radioactive contamination of groundwater on the site is also not addressed.

Importantly, the New York State Attorney General Letitia James, who has legally intervened to challenge the Indian Point license transfer to Holtec stated, “Putting the decommissioning of Indian Point in the hands of a company with no experience and uncertain financial resources is very risky.”

In any other scenario, a reckless company with this kind of woefully negligent and fraudulent record as well as lack of experience would be immediately disqualified. The Commission has a statutory obligation to ensure that a qualified candidate is considered and that Holtec is rejected as a licensee entrusted to decommission Indian Point. Any consideration of a potential licensee must require one that has a well-documented record of strong experience, competence, is well equipped to decommission Indian Point responsibly and safely and is free of the record of malfeasance Holtec has committed.

In closing, we urge The Commission, in the strongest possible terms, to reject the transfer of the Indian Point license to Holtec.

Thank you for the opportunity to comment.

Respectfully submitted by,

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