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**To:** [Docket, Hearing](#)  
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**Subject:** [External\_Sender] Docket ID NRC-2020-0021 – Opposing Indian Point License Transfer to Holtec  
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TO --  
NRC PUBLIC COMMENTS Docket ID NRC-2020-0021

FROM --  
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## COMMENT

It's important for the Nuclear Regulatory Commission -- NRC -- to understand who I am and the context of my comments.

When I moved to Peekskill, NY 15 years ago, I became the facilitator and spokesperson for the Peekskill Westside Neighborhood Association, roughly 130-150 residents who live west of Washington Street and adjoin the Hudson River. Our neighborhood is under a mile from Indian Point Energy Center.

## GROUNDWATER CONTAMINATION

I have included a timeline of incidents that our community of residents felt was of grave concern to our community living in the vicinity of Indian Point. We contacted Entergy, the NYS Department of Environment and Conservation, the New York Attorney General's office, and the NRC. We followed these incidences of radioactive water releases whose clean-up was never been thoroughly and comprehensively addressed by any of these entities, Entergy or the NRC.

Holtec, in the PSDAR, which in itself lacked the proper process, acknowledged that there was radioactive contamination of groundwater at the site, which is also leaking into the Hudson River. But it stated it planned to do nothing to remediate it, and will only monitor it. Nor does it plan to remediate contaminated soil any deeper than three feet. The PSDAR also stated Holtec is considering shipping large radioactive components by barge down the Hudson, which raises a host of additional unacceptable risks. Jeopardizing our community's public health is the greatest risk and a company that fails to address this should not even be considered as a proper licensee.

## RADIOACTIVE WATER RELEASE TIMELINE

2005: Owner of the plant, Entergy “discovers” new active leaks in the Unit 2 spent fuel pool. Data indicates that leaks had been occurring for years undetected. Entergy attributes a plume of tritium in the groundwater primarily to leaks from the Unit 2 spent fuel pool.

2006: Entergy “discovers” that attempts to prevent additional leaks from Indian Point Unit 1 spent fuel pool fail have failed – water laden with toxic radionuclides including Strontium-90 and Cesium-137 leaks from the pool to the environment at a rate of 70 gallons per day until the end of 2008, when Entergy *finally* emptied the problematic

pool. The contamination plume generated due to upwards of decades of leaks from the Unit 1 spent fuel pools will persist in the environment for centuries, leaching through the groundwater and into the Hudson River.

2009: in early 2009, a tank valve located in an Indian Point Unit 1 systems building leaked radioactive water, causing a nearby monitoring well to detect increased radioactivity levels.

2009, February: unmonitored, undetected corrosion in a pipe buried eight feet underground was discovered when a plant worker found himself standing in a puddle of water. About 100,000 gallons of water contaminated with Tritium was released to the already contaminated groundwater. The U.S. Government Accountability Office recently concluded that leaks at nuclear power plants from buried piping systems are expected to continue as such systems, which are largely inaccessible, age and continue to corrode and degrade.

2009, November: radioactive water spills from a storage tank, adding to the existing ground-water contamination. This leak caused various monitoring wells to register increased levels of tritium.

2010: Entergy discovers another new leak in Unit 2 spent fuel pool. This new leak caused various monitoring wells to register increased levels of tritium. Though Entergy claims that all identified leaks in the Unit 2 pool have been repaired, nearly 40% of the liner of the pool has never been inspected, and Entergy, to this day, concedes that other active leaks from the pool may *still* be occurring.

2011: In June 2011, monitoring wells near Indian Point Unit 1 detected elevated levels of tritium in the groundwater. However, it took several months for Entergy to even identify the leaking component that caused the increased tritium levels in the groundwater.

2016, February: The NRC was notified on Feb. 5, 2016, by Entergy of a new on-site tritium leak at the Indian Point nuclear power plant. Entergy, which owns and operates the Buchanan, N.Y., facility became aware of the leakage via samples drawn from existing groundwater monitoring wells. One of the wells samples taken around that time detected tritium levels of about 14.8 million picocuries per liter. Preliminary reviews by Entergy indicated the most probable source of the groundwater contamination was a spill during a water-purification operation involving the plant's Refueling Water Storage Tank. The work was terminated on Jan. 31, 2016.

Unfortunately, for our community consensus, the NRC responses was inadequate and certainly doesn't address any mitigation of this ground and ground-water radioactivity.

NRC in response to 2016 spill -- *No impacts on public health and safety are expected as a result of the leakage. Groundwater at the site is not used for drinking-water purposes. Further, while the water will slowly migrate to the Hudson River over the course of many months, the concentrations of tritium will be extremely low after entering the waterway because of the significant dilution that will occur. In addition,*

*river water downstream of the plant is brackish and is not used for drinking.*

## **HOLTEC'S HISTORY AS A POTENTIAL TERRIBLE NEIGHBOR**

**Here is a list of reasons Holtec should not be considered for the license transfer.**

- Holtec has no track record in nuclear plant decommissioning.
- Holtec does have a record of convictions — bribery, fraud, getting barred from doing business with entities like the TVA and the World Bank. This record was built by 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. Thank goodness for NYS Attorney General Letitia James challenge to the financial viability of Holtec and subsidiaries.
- 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. Again, see our New York State Attorney General's analysis of this problem financial structure.
- 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.

Thank you for your consideration of my comments. I hope you will conclude as many in the community have that Holtec is not the best neighbor to decommission Indian Point where public safety is tantamount.

Sincerely,

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