

**From:** [Bruce Campbell](#)  
**To:** [Docket, Hearing](#)  
**Subject:** [External\_Sender] Docket ID NRC-2020-0021 Opposing Indian Pt. license transfer to Holtec  
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March 23-25, 2020

Re: Docket ID NRC-2020-0021 Oppose Indian Point license transfer to Holtec and related companies

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

From my knowledge of the behavior and background of the Holtec company – and from my recent review of a couple dozen articles regarding Holtec, the Canadian company they merged with, and the plethora of conflict-of-interests relating to the Norcross brothers, it would be extremely foolhardy to allow this company to take over the license for the nuclear reactor complex at Indian Point since it could further endanger 20 million people within fifty miles of the facility. I also wish to point out that back in 1982 when then Representative Markey helped bring about the release of the Worst-Case Accident Consequences computer simulated predictions done by Sandia Labs which determined that the most expensive nuclear power accident in the country could be at Indian Point in which they predicted \$314 billion in property damage (using the value of 1982 dollars). The Chernobyl and Fukushima accidents have proven that this estimate is seriously too low.

It is also quite reckless (and showing disregard for disingenuous and corrupt activity) to seriously consider this significant request to take over the Entergy license to run the Indian Point nuclear power facility and waste dump. So when Holtec / merged companies submitted paperwork seeking the takeover of the Entergy license for the Indian Point site, not only did they pretend to already have that license, but seeing that they did not do a site assessment, do not plan to remediate more than three feet below the ground surface, and did not mention pesky things like the nearby natural gas pipeline, it is clear that the Holtec-related companies consider all nuclear sites as “generic” calling for a basic taking apart components and half-assed cleanup. Excuse me, though I am on the opposite coast, I don’t believe what has likely been historically a sacred site on the key watershed of the most densely populated region in the USA is just another reactor complex. That is not generic, so at least insist that any application for a license takeover give a better idea of some site-specifics. In fact, there should be a whole EIS process required as a prelude to even applying for such a license -- since how thorough or shoddy their work will be can have profound impacts on 20 million people in the region. The proposal to do the decommissioning work in just 8 years indicates that they do not plan to seriously decontaminate the site (even perhaps in that top three feet of soil). Also the plan to do the decommissioning in a mere 8 years indicates that even if somehow Holtec radwaste canisters can be transported – despite their CEO Singh indicating otherwise, would result in certainly a vast majority of the overstuffed canisters still being on the Indian Point site when the Holtec / CDI-type companies will declare their decommissioning wrapped up, pocket the remainder of the ratepayer funds paid into the decommissioning account, and then leave the site despite all or nearly all of the really hot spent fuel waste still being onsite.

I was present at the Community Engagement Panel hearing on San Onofre I believe it was in

southern Orange County when I specifically heard Dr. Krishna Singh say that his company's canisters "cannot be monitored, re-packaged, or transported." Thus, besides the considerable challenges involved with long-distance transport of Indian Point radioactive waste to New Mexico (or Texas or ?), I believe that the Nuclear Regulatory Commission must waive current regulations to allow the transport of supposedly non-transportable overpacked radwaste canisters. I was just re-reading this paper and wish to point out that I surely am not advising that the NRC waive transport safety regulations -- because it would cause such a hazard on American highways, train tracks, and waterways, but it would seem likely that the NRC would need to make such a deregulatory ruling to pave the way for that dangerous threat. Please illuminate me as to how canisters designed not to be monitored, re-packaged, or transported can be safely transported long distances. (By the way, Dr. Singh is on audio-video at that CEP hearing confessing to the limitations of his company's radwaste containers.)

Back in more normal times in the past century, there were government entities looking for monopolies to break up. How many angles of the nuclear stew do you want your chosen contractors to be involved in? Even if Holtec International and their shady Canadian corporate partners did not have a history of criminal and shady doings, Holtec should be disqualified from even being in contention due to their extremely thin and extremely overpacked (with spent fuel rod assemblies) canisters. So, Holtec makes the canisters, is arranged to decommission the Oyster Creek and Pilgrim nuclear power facilities, is proposing the Consolidated Interim Storage dumpsite in New Mexico, and at least proposes to manufacture modular nuclear reactors -- which are particularly bad in terms of material available for "dirty bomb"-making. It would not be surprising to find new "modular" reactors up and running at the Indian Point, NY, site at least soon after the completion of the not 60-year decommissioning process (which is allowed) but the mere 8 years of planned decommissioning at Indian Point. Are there serious precautions planned in order to lessen the chances that spent fuel relating to modular nuclear reactors will be used to make "dirty bombs" which could seriously impact New York and other areas.

Holtec is on the cutting edge of forming Limited Liability Corporations to make considerable profit while sticking the public taxpayers with the liability. The insufficient capitalization relating to Holtec's application to take over the Indian Point Energy Center should be reason alone to reject these sleazeballs!

To summarize:

1. Holtec's canisters are a thin, overpacked, sad dangerous joke at best;
2. Both Holtec and their Canadian corporate partners have very shady and even criminal records; -- each appears to be a monopoly unto themselves even before the takeover of the Pilgrim and Oyster Creek nuclear power facilities, even before the merger of the American and Canadian companies, and even before examining the notable conflicts-of-interests by the Norcross brothers including being on the Holtec / merged companies board with other colluding brothers including one who wrote legislation to get tax breaks for Norcross-related companies (and otherwise worked to pocket lots of taxpayer funds).

3. Holtec is already flirting with monopoly even before the shady Canadian company came along for them to merge with -- since it has its fingers in radwaste containers, decommissioning, allegedly interim consolidated radwaste site, and modular nuclear reactors. Holtec is a walking monopoly by itself, even without merging with the Canadian company which had monopolistic practices even before the merger with Holtec. And if there is not enough monopoly, collusion, and conflict of interest between Holtec and SNCL, the corporate board member (of the product of this merger known as Comprehensive Decommissioning International, LLC) named "King" George Norcross (and his brothers) have numerous shady, monopolistic, and lobbying for tax breaks activities both connected and unconnected with his corporate board activities;

4. Holtec arranged its complex subsidiary structure of essentially undercapitalized and siloed Limited Liability Corporations to shield it from both liability and from accountability;

5. Holtec has proposed the unsafe Consolidated Interim Storage facility in the state with the highest percentage of Latino / indigenous population in the USA, New Mexico -- which does not want the facility (and if anyone thinks that this site would actually be an "interim" site, I have a bridge to sell you!);

6. Holtec significantly underestimated the cost of decommissioning the Indian Point site -- or else it plans to do a shoddy rather than thorough job (or both), and did not even give a site characterization of the Indian Point site on the Hudson River. Apparently, Holtec's proposed decommissioning at Indian Point will not seek to remediate the radioactivity in nearby groundwater which also gets into the Hudson River (but merely monitor the nearby groundwater), and it totally ignores what impact decommissioning may have on the nearby Algonquin Natural Gas Pipeline which runs near the Indian Point site which raises risks of rupture and fire. Holtec furthermore has indicated that they do not plan to do any decommissioning activities deeper than three feet from the surface. (Is there a clay or cement liner at three feet deep? Is not gravity in effect along the Hudson River even deeper than three feet from the surface??) I note that Holtec / CDI lowballs an estimate for decommissioning Indian Point while failing to even do a site characterization. Ironically, that proves that the new name for the merged US & Canada companies, Comprehensive Decommissioning International is a contradiction in terms when pertaining to the plans to not thorough remediation of the site at Indian Point deeper than 3 feet from the surface. Perhaps change the name of the newly merged company to HADI -- which would be Half-Ass Decommissioning International! So the combined Holtec plus Canadian company want to acquire nuclear power facilities on a "possession-only" basis and then sub-contract with CDI to do the decommissioning in as little as 8 years. Apparently 60 years are allowed to decommission a nuclear power facility -- there must be some marketer getting a good laugh when calling poorly considered and quite brief decommissioning activities to be "comprehensive", while the following numbered point will explain why the installation near San Onofre State Beach in southern California is cleverly but bogusly named.

7. Holtec has demonstrated notable incompetence in regards to spent fuel handling at the San Onofre nuclear waste site (which nearly resulted in disaster because an 85-ton Holtec canister nearly dropped when being hoisted and then lowered into the so-called "Interim Spent Fuel Storage Installation" just above San Onofre State Beach in the other most populated portion of our nation), and Holtec shows it cares neither about competence nor about safety when it hired unqualified low-

skilled workers upon its takeover of the Oyster Creek nuclear site in New Jersey. Note: since Holtec's thin canisters are not designed to be monitored, re-packaged, or transported (and thus are too dangerous to transport), thus the "ISFSI" is a bogus acronym since that facility very likely will remain at the site until some waves relocate some of the hardware later in this century since it is too dangerous to move this radwaste more than yards due to the inferior Holtec canisters.

8. Holtec apparently improperly submitted an application called a Post-Shutdown Activities Report essentially pretending to already be the licensee for the Indian Point site. (It is my understanding that Indian Point has not yet been shut down, and Holtec is not involved with its current management to my knowledge.) Plus, Holtec just says what sounds good – rather than the statement having any basis in reality. For instance, they claim that no human lives within 35 miles of their planned dump in southeastern New Mexico, yet a commenter pointed out that they network with someone who currently lives about a mile from the proposed dumpsite. Does 35 miles = one mile for Holtec?

And then there is the situation where the Norcross brothers' various companies earlier half-heartedly sought bids for possibly moving the companies to Philadelphia, but by the time they submitted paperwork claiming that they would need tax breaks in order to remain in New Jersey, the letters of intent pertaining to the applications had already expired. Apparently all of the Norcross brothers forgot to collude on all aspects of their paperwork submission, so that a Norcross brother-affiliated company like Conner, Strong & Buckelew deliberately submit bogus information about out-of-state location alternatives including checking "no" on an application when asked if any jobs were at risk of leaving New Jersey. On the other hand, Holtec CEO Dr. Singh lied on his paperwork and yet still got \$260 million to house their offices on the Camden riverfront!

9. Besides not being able to transport their own Holtec canisters without special NRC permission, there are other transport concerns such as Holtec suggesting shipping some major nuclear facility components by barge down the Hudson River.

10. Pro Publica on 5-2-19 summarized Holtec boardmember George Norcross in this way: "Meet George Norcross. Nearly two thirds of \$1.6 billion in tax incentives in his hometown of Camden, New Jersey, went to his own company, business partners, political allies and clients of his brother."

I wish to make a comment regarding trustworthiness. Holtec's history leads a sensible observer TO CONCLUDE THAT HOLTEC CAN BE TRUSTED – TO DO AN INCOMPETENT JOB WITH LOUSY HARDWARE AND LOW-SKILLED WORKERS and moving things (if bureaucratically permitted and physically possible) to POORLY CONSIDERED DUMPSITES!

I have just read over a dozen articles regarding George Norcross and tax breaks, and you've got to be kidding! New Jersey is known globally for corruption – even if one had never heard of people like Chris Christie and (some call him) King George Norcross!!! I call for a special prosecutor to investigate and hopefully prosecuted the colluding involved with those many tax breaks and conflicts of interest. Let Mr. Chen's New Jersey governor-appointed task force conclude at the end of its work whether there needs to be a specific RICO investigation as well. And I understand that New York State is essentially subsidizing nuclear reactors partially under the guise of supposedly helping the climate, and then, as the people of Camden, NJ continues to suffer, one guy and his family and

companies get massive pay-offs and gentrifies a little area of Camden with a few luxury buildings and doesn't help the masses at all who could use a hand up. The public taxpayers are being fleeced in NOO YAWK AND NOO JOISEY to help corrupt people and irresponsible companies contending with extremely dangerous materials!

Seeing that Norcross has an insurance company, he likely knew how to make arrangements within Holtec legal documents to extract maximum profit and escape liability for their shoddy equipment, poorly trained workers, and now for their prematurely applied for license takeover at Indian Point to facilitate a fairly near future not very thorough decommissioning scheme which is already planning to merely monitor radioactivity in groundwater rather than remediate any of that serious contamination -- plus not deal with any contamination more than 3 feet below the surface and to ignore the threats from some major construction/destruction/decommissioning operations on the nearby Algonquin Natural Gas pipeline which could result in fire, explosion, and even spent fuel melt!

Please examine accident possibilities (including worst-case scenarios) relating to decommissioning work at the Indian Point site which could impact or rupture the nearby Algonquin natural gas pipeline.

Also, earlier I have mentioned the major slap-in-the-face to those seeking environmental justice by proposing that the state of the union with the highest percentage of Latino / indigenous people should receive the so-called consolidated interim facility (which is EXTREMELY LIKELY to become permanent). Stop the bogus naming of companies whose names themselves are a slick p.r. campaign having nothing to do with reality. I will also note the name of the facility to which we are referring is Indian Point. It was named this likely due to historic ceremonies and other indigenous activities on this site. Thus, I consider the proposals for a mere 8-year decommissioning to be followed closely by additional dangerous (this time modular) reactors on what was a sacred site as an Environmental Justice matter and certainly would be a disgraceful insult to indigenous people and to anyone else seeking to go in balance on our Mother Earth.

Let's say that one owns some property and realizes that there are areas with extremely toxic / radioactive materials on that parcel of land. What landowner would spend billions of dollars to decommission facility buildings and help remediate the site (yet only going down to the depth of three feet), but still keep the Holtec canisters with the real hot radwaste (the spent fuel rod assemblies which are overpacked into Holtec canisters and vented to try to prevent the canisters from getting too hot and possibly exploding) on-site. HOW CAN UNTRANSPORTABLE CANISTERS BE TRANSPORTED(?) – unless the NRC determines to forget about safety, and allows the untransportable to be transported! What are the odds that Holtec canisters at the Indian Point site would never be moved? I want to point out that it is a major rip-off of ratepayers and taxpayers to spend a lot (though likely not enough since plans are to pocket a good amount of profit) on decommissioning, but still have the most dangerous material still on-site. Overstuffed Holtec canisters could explode and cause a trillion dollars worth of damage. If a Holtec canister explodes during the decommissioning process at Indian Point, would CDI / Holtec / Norcross-related companies then decommission / somewhat decontaminate the site all over again since the real hot stuff is now spread around more (but certainly not just on the site)? Where would the money come

from for such work – especially since there are clearly plans to pocket a good amount for profit? Another question is – if Holtec CEO Dr. Singh was correct that his company's canisters are not transportable (or monitorable or repackagable), then it sounds like they will remain on the Indian Point site. What if a Holtec overpacked thin canister explodes after CDI has declared the end to their decommissioning work at Indian Point? I would surmise that a slick Norcross brother attorney will have worded contracts and arrangements in order to escape any further cleanup work on the Indian Point site if there is a Holtec canister explosion following what the CDI determined to be the end to their decommissioning work on the Indian Point site.

I also wish to point out that the people of New York deserve a thorough decommissioning and decontamination including remediating radioactive groundwater and preventing interchange between such groundwater and the Hudson River. Obviously, the Jersey boys will be pocketing major cash, and it is extremely likely that they will do a once-over for the top 3 feet of soil, and then declare their job complete. In case Holtec canisters can never be moved from the site – and if there is a serious overstuffed canister mishap such as an explosion, what are the odds that CDI or related companies will do any more work at the Indian Point site.

I also wish to point out that it would likely show somewhat more respect for facility workers if some aspects of decommissioning could wait awhile to at least let some shorter-lived radionuclides decay some more before workers get exposure. Since the NRC allows up to 60 years to decommission, not only is a fairly quick shoddy decommissioning plan an insult to celled organisms and the Hudson River watershed ecosystem, but CDI is likely planning on that time frame because they realize that overstuffed Holtec canisters would still be a danger and they want to declare their half-ass work as all wrapped up in order to escape any liability or to escape any call for CDI to get back on the site to then decommission and decontaminate the now more radioactive than ever Indian Point site.

Please let the New Jersey governor's task force headed by Mr. Chen complete their entire investigation – and then allow prosecutions and trials to proceed before giving any consideration to the reckless proposal for Norcross brother companies to do the non-comprehensive decommissioning of the Indian Point nuclear power facility site.

Also, is it conceivable both that Holtec canisters will remain on the Indian Point site, and that they will get modular nuclear reactors up and running on that site despite the Holtec canister still being around (since they are not designed to be transported)? What dangers and unknowns would be involved with such?

In conclusion, an even-handed observer can easily conclude that these companies who manufacture inferior radwaste canisters and are known to bribe Libyans to the tune of hundreds of millions of dollars (besides other shady and shoddy activities) **MUST ONLY BE SERIOUSLY CONSIDERED FOR PROSECUTION** – rather than for the take-over of the license at the Indian Point facility which literally threatens more Americans than any other facility in the USA! Please take a hint from both the World Bank (who disbarred the Canadian company that Holtec merged with for “global corruption” relating to its hundreds of millions of dollars of bribes to the Libyan regime -- while of course pocketing millions for themselves), and from the Tennessee Valley Authority who

created a disbarment process following the bribery by Holtec / Dr. Singh back in 2010, but then concluded that they would not do work with Holtec for 60 days (showing TVA doesn't feel THAT strongly about bribery), forced them to pay a \$2 million "administrative fee" and was to monitor their work more closely for the next year. Jim Walden, the lead attorney on the task force investigating lucrative tax breaks primarily for Norcross brother-related companies, indicates that Dr. Singh at least played a role in this TVA bribery situation – or at least was aware of the activity. Reject these pathetic jokes of companies with shoddy hardware and vague generic plans to take apart and lightly decontaminate three feet of soil at this incredibly significant site along New York's Hudson River!

Thanks for your consideration of my concerns and reject this license transfer – and do not consider the application until all investigations (including any related prosecutions) have been thoroughly completed.

Sincerely yours,

Bruce Campbell  
10008 National Bl. # 163  
Los Angeles, CA 90034