

From: [David Feldman](#)
To: [Borges Roman, Jennifer](#)
Subject: [External_Sender] Decommissioning at Indian Point Plant
Date: Thursday, February 13, 2020 7:59:54 AM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point (less than 10 miles away), I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

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It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But

there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely,

David Feldman
3 Robbie Rd.
Corltandt Manor, NY 10567

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Washington, DC 20555-0001
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Thank you,

A handwritten signature in black ink, appearing to read 'SR', followed by a long horizontal line.

Susan Riordan
35 Ferris Place
Ossining NY 10562

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

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Sincerely,

Lynne Teplin
846 Palmer Road #1A
Bronxville, New York 10708

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

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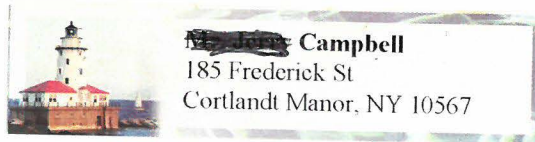
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Sincerely,
Gene Campbell



241 Nimham Road
Kent Lakes, NY 10512
February 12, 2020

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

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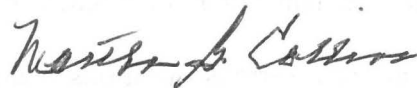
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Sincerely,

A handwritten signature in dark ink, appearing to read 'Martha G. Collins', written in a cursive style.

Martha G. Collins

As of: 2/20/20 8:55 AM Received: February 14, 2020 Status: Pending_Post Tracking No. 1k4-9f0n-pjmp Comments Due: February 24, 2020 Submission Type: Web
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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

Document: NRC-2020-0021-DRAFT-0023

Comment on FR Doc # 2020-00824

Submitter Information

Name: Elizabeth Peterson

Address:

Cortlandt Manor, NY, 10567

General Comment

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

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As of: 2/14/20 10:12 AM Received: February 12, 2020 Status: Pending_Post Tracking No. 1k4-9ezc-86sp Comments Due: February 24, 2020 Submission Type: Web

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

Document: NRC-2020-0021-DRAFT-0015

Comment on FR Doc # 2020-00824

Submitter Information

Name: Ellen Heidelberger

Address:

7 Stephen Lane

Cortlandt Manor, NY, 10567

Email: eheidelberger@hotmail.com

General Comment

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

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The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask

that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

As of: 2/14/20 10:25 AM Received: February 13, 2020 Status: Pending_Post Tracking No. 1k4-9ezn-oe12 Comments Due: February 24, 2020 Submission Type: Web

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

Document: NRC-2020-0021-DRAFT-0017

Comment on FR Doc # 2020-00824

Submitter Information

Name: Kale Roberts

Address:

195 Old Albany Post Road
Garrison, 10524

Email: buffalokale@gmail.com

General Comment

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent

assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

Despite the fact that Holtec has never decommissioned a large nuclear power plant, it now proposes to perform several such decommissioning operations simultaneously, including, not only Indian Point, but also Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in decommissioning are too great to rely on other than successful performance in an initial project before authorizing additional endeavors.

It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

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As of: 2/14/20 10:27 AM Received: February 13, 2020 Status: Pending_Post Tracking No. 1k4-9eq-25n6 Comments Due: February 24, 2020 Submission Type: Web
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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

Document: NRC-2020-0021-DRAFT-0018

Comment on FR Doc # 2020-00824

Submitter Information

Name: Anonymous Anonymous

Address:

39 Wells Avenue

Croton on Hudson, NY, 10520

Email: ricki.rusting@gmail.com

General Comment

As a resident who lives close to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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authorizing additional endeavors.

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Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

As of: 2/14/20 10:36 AM Received: February 13, 2020 Status: Pending_Post Tracking No. 1k4-9ezr-a1q2 Comments Due: February 24, 2020 Submission Type: Web

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

Document: NRC-2020-0021-DRAFT-0019

Comment on FR Doc # 2020-00824

Submitter Information

Name: George Fouhy

Address:

POB22 Crompond
crompond, NY, 10517

Email: georgef@bestweb.net

Organization: Castle Oil Corp

General Comment

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

George Fouhy
41 Baron De Hirsch Rd.
Crompond, NY 10517

As of: 2/20/20 9:05 AM Received: February 15, 2020 Status: Pending_Post Tracking No. 1k4-9f14-febz Comments Due: February 24, 2020 Submission Type: Web
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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

Document: NRC-2020-0021-DRAFT-0024

Comment on FR Doc # 2020-00824

Submitter Information

Name: My Nguyen

Address:

28 N 1st St

Cortlandt Manor, NY, 10567

Email: vitvuvo@yahoo.com

General Comment

See attached file(s)

Attachments

Comments on Indian Point Decommissioning Transfer

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

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As of: 2/20/20 9:20 AM Received: February 15, 2020 Status: Pending_Post Tracking No. 1k4-9f1a-f34l Comments Due: February 24, 2020 Submission Type: Web
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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

Document: NRC-2020-0021-DRAFT-0027

Comment on FR Doc # 2020-00824

Submitter Information

Name: Enid Breisblatt

Address:

47 Sunset Lane

Croton on Hudson, 10520

Email: breiscom2@gmail.com

General Comment

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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As of: 2/20/20 9:47 AM
Received: February 18, 2020
Status: Pending_Post
Tracking No. 1k4-9f35-a08v
Comments Due: February 24, 2020
Submission Type: Web

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

Document: NRC-2020-0021-DRAFT-0033

Comment on FR Doc # 2020-00824

Submitter Information

Name: Eliza Dean

Address:

117 S Highland Ave

Ossining, NY, 10562

Email: eliza.dean61@gmail.com

General Comment

See attached file(s)

Attachments

Comments on Indian Point Decommissioning Transfer

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

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Eliza Dean
Resident of Ossining NY

As of: 3/6/20 7:49 AM Received: February 24, 2020 Status: Pending_Post Tracking No. 1k4-9f7e-8dvs Comments Due: February 24, 2020 Submission Type: Web

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

Document: NRC-2020-0021-DRAFT-0130

Comment on FR Doc # 2020-00824

Submitter Information

Name: Anna Drabek

General Comment

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

From: [Calypsidog](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] closing of Indian Point, New York
Date: Monday, February 24, 2020 9:49:28 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

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It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

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Respectfully
Joan Mullee

From: [A Drabek](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point Public Comment
Date: Monday, February 24, 2020 9:27:57 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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Best,
Anna Drabek

From: [Tom Warner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] I have concerns about Indian Point Nuclear reactor
Date: Friday, February 14, 2020 6:37:20 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

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The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

From: lmiranda@cognizantcommunication.com
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point Concerns
Date: Thursday, February 13, 2020 1:05:01 PM

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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Thank you for your time and consideration.
Lori Miranda

From: [Stephanie](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Concerned Citizen
Date: Thursday, February 13, 2020 12:38:02 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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--

Stephanie Marie Hickey

From: [George Fouhy](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021
Date: Thursday, February 13, 2020 10:30:50 AM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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George Fouhy
41 Baron De Hirsch Rd.
Crompond, NY 10517

From: [Ricki Rusting](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point Decommissioning concern
Date: Thursday, February 13, 2020 9:54:23 AM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident who lives close to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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Sincerely,

Ricki Rusting

From: [Gary Abrams](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point decommissioning
Date: Wednesday, February 12, 2020 9:57:41 PM

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely yours,
Gary Abrams

From: [Amy Hersh](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point de-commissioning
Date: Wednesday, February 12, 2020 7:59:45 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

Despite the fact that Holtec has never decommissioned a large nuclear power plant, it now proposes to perform several such decommissioning operations simultaneously, including, not only Indian Point, but also Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in decommissioning are too great to rely on other than successful performance in an initial project before authorizing additional endeavors.

It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

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Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely,
Amy Hersh
982 Lester Road
Yorktown Heights, NY 10598

From: [Elizabeth Brown, CPA](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point and NRC
Date: Wednesday, February 12, 2020 6:41:56 PM
Attachments: [image001.png](#)
Importance: High

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

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Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Thank you.

Elizabeth Brown, CPA
26 Dawning Lane
Ossining, NY 10562
914-345-1040



From: [Elizabeth Terbrock](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] The Upcoming Decommissioning of Indian Point Energy Center
Date: Wednesday, February 12, 2020 6:29:57 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

Despite the fact that Holtec has never decommissioned a large nuclear power plant, it now proposes to perform several such decommissioning operations simultaneously, including, not only Indian Point, but also Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in decommissioning are too great to rely on other than successful performance in an initial project before authorizing additional endeavors.

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There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Thank you for your attention to this matter.

Sincerely,

Elizabeth Terbrock
P.O. Box 311
Maryknoll, NY 10545-0311

From: [Tom Berta](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Decommissioning of Indian Point
Date: Wednesday, February 12, 2020 6:01:05 PM

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center. Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec. At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work. Despite the fact that Holtec has never decommissioned a large nuclear power plant, it now proposes to perform several such decommissioning operations simultaneously, including, not only Indian Point, but also Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in decommissioning are too great to rely on other than successful performance in an initial project before authorizing additional endeavors. It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point. There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey. I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation. To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance. Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI. The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted. Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC. The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Tom Berta
38 Hudson Point Lane
Ossining, NY 10562

--

Tom Berta
914.762-4883
914.261.3395 - cell

From: [Susan Kassouf](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Concerns about Holtec Decommissioning Indian Point
Date: Wednesday, February 12, 2020 5:48:59 PM

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

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There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation.

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Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

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Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be

grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely,

Susan Kassouf

From: [Thomas Comiskey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point Decommissioning
Date: Wednesday, February 12, 2020 4:09:18 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

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Sincerely,

Thomas & Beatrix Comiskey
323 Kemeys Cove
Scarborough NY 10510

Sent from my iPhone

From: [Carol Banker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point
Date: Wednesday, February 12, 2020 2:32:42 PM

Carol Sternau
45 Bank Street
Cold Spring, NY 10516

February 12, 2020

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rule-makings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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Respectfully,

Carol Sternau

From: [donald kimmel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point
Date: Wednesday, February 12, 2020 1:52:34 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

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there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely,

Donald Kimmel

914-589-3929

dksecretgardener@gmail.com

From: [Annika Many](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Indian Point Nuclear Generating Unit Nos. 1, 2, and 3; Consideration of Approval of Transfer of Control of Licenses and Conforming Amendments
Date: Wednesday, February 12, 2020 1:01:27 PM

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

Despite the fact that Holtec has never decommissioned a large nuclear power plant, it now proposes to perform several such decommissioning operations simultaneously, including, not only Indian Point, but also Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in decommissioning are too great to rely on other than successful performance in an initial project before authorizing additional endeavors.

It is far from clear that Holtec employs sufficient qualified senior staff to supervise

such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for

Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely,
Annika Many
1015 McKinley Street, Peekskill, NY 10566

From: [Bryan Hickey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2020-0021 : Indian Point Decommissioning
Date: Wednesday, February 12, 2020 12:42:28 PM

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

Dear Regulatory Commission,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

I am also requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

Holtec has never decommissioned a large nuclear power plant, however, it now proposes to perform several such decommissioning operations simultaneously; at Indian Point, Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in decommissioning are too great to rely on utterly untested performance.

It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. In fact, upon investigation you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

The intended financial arrangements also offer precisely the wrong incentives. As proposed, Holtec's profits will be enhanced by any money remaining in the decommissioning fund when the work is completed. Thus, there is every incentive for Holtec to cut corners, employ less-qualified staff, and rush through various phases of the work in order to complete it before the decommissioning fund is completely depleted.

Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Thank you for your consideration,

Brian Hickey

From: [Sherman Alpert](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Holtec's decommissioning plan
Date: Wednesday, February 12, 2020 12:41:54 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident who lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

Despite the fact that Holtec has never decommissioned a large nuclear power plant, it now proposes to perform several such decommissioning operations simultaneously, including, not only Indian Point, but also Pilgrim in Massachusetts, Oyster Creek in New Jersey, and Palisades in Michigan. The potential risks in decommissioning are too great to rely on other than successful performance in an initial project before authorizing additional endeavors.

It is far from clear that Holtec employs sufficient qualified senior staff to supervise such simultaneous efforts, much less the large number of specially trained technical workers whose services will be required. The nature of the work is such that it can only safely be performed by such skilled and experienced specialists. And the work will be more complicated than that at other reactors because of the absence of a rail spur at Indian Point.

There are also serious questions regarding Holtec's business ethics. When looking into their history you will find a proven track record of dishonesty and corruption, whether it be bribery at the Tennessee Valley Authority, failed promises at its Orrville facility in Ohio, or misrepresentations in its application for tax benefits in New Jersey.

I also have grave financial concerns. Holtec has estimated the total cost of decommissioning at \$2.3 billion. However, in essentially every nuclear plant decommissioning, unanticipated circumstances increase the cost above the initial estimate. We therefore cannot accurately know what the ultimate cost of this project will be.

The fund established for decommissioning Indian Point contains about \$2.1 billion and Holtec claims that earnings achieved through investing the fund will make up the difference. But there is no guarantee that such earnings will be adequate to complete the operation.

To perform the decommissioning, Holtec has formed Comprehensive Decommissioning

International (CDI), a joint venture with SNC-Lavalin. Through the CDI, the parent companies are insulated from financial responsibility for the project. Thus, should funds prove inadequate and CDI file for bankruptcy, the decommissioning will lie unfinished and the taxpayers of New York will be forced to pay for the balance.

Thus, if NRC does approve the transfer of Indian Point to Holtec, the parent company should not be absolved of financial responsibility and Holtec should be compelled to provide any additional monies beyond those in the decommissioning fund needed to complete the work, independent of the status of CDI.

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Holtec has requested permission to use decommissioning funds for spent fuel management. This should be denied regardless of what other rulings are made by NRC.

The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Sincerely,
Sherman Alpert
Briarcliff Manor, NY

From: [Stacey Gibson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Holtec
Date: Wednesday, February 12, 2020 12:32:47 PM

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

At San Onofre in California, where Holtec has been retained to manage spent fuel, a contractor reported an apparent near accident involving a dry cask filled with spent assemblies. The contractor also alleged the site was understaffed and its supervisors often replaced with less experienced managers. This does not generate confidence that Holtec is capable of safely executing major decommissioning work.

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The NRC must take seriously its obligation to keep our community safe through the decommissioning process. If the NRC grants this license transfer to Holtec I fear there will be grave consequences for residents living along the lower Hudson Valley, and the greater New York metropolitan area. For these reasons I ask that

you deny Holtec's application for the transfer and to hold a public hearing on next steps for Indian Point decommissioning.

Yours truly,
Stacey Gibson
70 Snake Hill Road
Garrison, New York 10524
845-424-8318 (home)
914-419-0181 (cell)

Everyone you meet is fighting a battle you know nothing about. Be kind. Always.

U.S. Nuclear Regulatory Commission – BY FAX: 301-415-1101
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

RE: INDIAN POINT

To Whom it May Concern,

As a resident that lives in close proximity to Indian Point, I am asking that the NRC take seriously the myriad concerns about Holtec's decommissioning plan that have been presented by professionals in the field, the media, and community members, and request that you deny their application for the transfer of ownership of Indian Point Energy Center.

Secondly, I am requesting that the NRC hold a public meeting to answer some of the lingering technical, fiscal, and ethical concerns surrounding Indian Point decommissioning and Holtec.

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Thank you for your time and consideration.
Lori Miranda – resident of Cortlandt Manor, NY