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Subject: [External_Sender] Docket ID NRC-2020-0021 – Opposing Indian Point License Transfer to Holtec
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Holtec's multiple problems and lack of experience disqualify them to decommission Indian Point. Their entire nuclear "fleet" was acquired less than a year ago. They've demonstrated dangerous incompetence handling spent fuel at San Onofre and put cost ahead of safety by hiring unqualified, low-skilled workers at Oyster Creek.

In their prematurely filed Post-Shutdown Activities Report, Holtec greatly underestimated the cost of decommissioning Indian Point and ignored the Algonquin Pipeline passing near the plant's critical components, which greatly complicates decommissioning and raises risks of ruptures and fires. They do not plan to treat the radioactive groundwater leaking into the Hudson River or contaminated soil below three feet. They're also considering shipping large radioactive components by barge down the Hudson, raising more unacceptable risks.

Holtec's undercapitalized LLCs shield them from liability and accountability, while maximally leveraging the decommissioning trust fund for their own profit. Embroiled in numerous scandals, which refute their claims of high standards and trusted stewardship of nuclear materials, their actual record is full of corruption, bribery, fraud, and lying to officials -- barring them from doing business with TVA and the World Bank.

As NY Attorney General Letitia James said when filing a petition challenging the license transfer to Holtec, "Putting the decommissioning of Indian Point in the hands of a company with no experience and uncertain financial resources is very risky."

20 million people live and work within 50 miles of Indian Point. Decommissioning is a complex undertaking on which the safety of our region depends. Indian Point's licensee must be competent and trustworthy, free of the serial malfeasance Holtec has committed. The NRC must therefore reject Holtec's license transfer application.

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