

COMMENTS TO NRC

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My name is Henry Kelly. My wife and I have lived in Ossining, NY, roughly 10 miles south of Indian Point, for 35 years.

First, thank you for having this comment opportunity.

I have multiple comments and questions.

The PSDAR, issued back in 2019, has not been updated. Why?

That document, while meticulous about costs and timelines, disturbingly avoided the outline of risks and the planning analysis that would be expected of a demolition project involving material radiologically contaminated for decades.

The added risk of co-located high pressure gas pipelines is not even mentioned.

The term "community public safety" was never once even mentioned in the document.

Holtec cites the NRC Generic Environmental Impact Statement. Yet Holtec says decommissioning of nuclear plants poses no added risk while the NRC GEIS itself clearly states that "decommissioning increases the risk of potential release of radiologic material". (See Section 4.3.9.2 of NUREG-0586 Supplement 1)

The whole issue of material handling, isolation and on-site controls of piles of radioactive debris is missing.

If decommissioning of nuclear power plants is so without risk and the materials involved so mundane and undangerous, why is it so expensive to do the work?

The answer, while avoided in the PSDAR is simple. RADIATION!

Winds, rain, storms will hit the site during decommissioning. Material will become airborne and drift offsite.

No smell, no taste, no sound, not visible, but poisonous to humans.

Where is the document that describes how the surrounding communities will be protected from, and if necessary, alerted to an incident that impacts public health.

The NRC does not mandate Holtec to provide and operate off-site radiological monitoring. Why?

There should be multiple rings of sensors, out to 15 miles in all directions around Indian Point, as well as airborne sensors over the site itself, to continuously report on amounts and directions of isotopes moving off-site.

The public needs open access to that information as well.

On the ground, at the site itself, will all materials be immediately put in containers, or covered, or put in open piles?

At what physical intervals will monitoring instruments be placed on-site?



What stop-work protocols will be in place if radiological levels rise and what emergency response plans will be in place?

24/7 monitoring must be required for work of this magnitude that impacts the health and future of tens of thousands of people in the surrounding communities.

That is simply part of the job and the costs.

Public safety is job number 1, not an afterthought.

The NRC has an obligation to the citizenry to insure that.



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