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Holtec Decommissioning International, LLC Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3 Post-Shutdown Decommissioning Activities Report

Comment On: NRC-2021-0125-0002

Holtec Decommissioning International, LLC; Indian Point Nuclear Generating, Unit Nos. 1, 2, and 3; Post-Shutdown Decommissioning Activities Report

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General Comment

As you may already know, Indian Point's owner, ENTERGY sold the I.P. reactors to Holtec Int'l in 2019. HOLTEC is responsible for the safe decommissioning of the reactors and the spent fuel at Indian Point. Holtec, profit-motivated and new at the process of nuclear plant decommissioning, needs robust oversight because I want the decommissioning process to be safer for all residents of the Hudson Valley. Holtec's Plan for Post-Shutdown Decommissioning Activities Report ("PSDAR") gives very inadequate (or non-existent) treatment to key safety issues affecting the New York Metropolitan Area, including where I live (Montrose), which is just a few miles from Indian Point. These issues include:

- Location of the spent nuclear fuel: The spent fuel should be safely stored at Indian Point, not transported elsewhere. According to the Holtec plan, spent fuel is to be shipped by sea and land (an unsafe proposition) to the State of New Mexico to Holtec's "interim" location there. But the Governor of that State has notified the Nuclear Regulatory Commission that the State refuses to accept high-level nuclear waste!
- Cask and Canister issues: The existing 20 - 25 year warranty on canisters and the cask system is seriously inadequate, given the very long time that radioactive decay occurs naturally; the warranty period should be much longer, and canisters should have pressure monitors installed to help prevent radioactive leaks.
- About 60% of Indian Point's spent fuel is classified as high-temperature "burnup fuel"; Moving this fuel to dry cask storage should be done in 7 years (or more), rather than the 3 years planned by Holtec, in order to make the process safer for the workers and the surrounding community.
- Radiation monitoring & control: Holtec's PSDAR makes no provision for effective, accurate, off-site radiation monitoring despite the fact that radioactive particles and gasses are expected to be released into

the air during the demolition of structures on site. nor is there any way in the Holtec plan to remediate any leak, should it occur.